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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

U.S. Bank National Association
Charter Number: 24

425 Walnut Street
Cincinnati, Ohio 45202

Office of the Comptroller of the Currency

Large Bank Supervision
Constitution Center
400 7th Street SW
Washington, DC 20219

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

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State of Indiana
State of Iowa
State of Kansas
State of Kentucky
State of Minnesota
State of Missouri
State of Montana
State of Nebraska
State of Nevada
State of New Mexico
State of North Dakota

State of Ohio
State of Oregon
State of South Dakota
State of Tennessee
State of Utah
State of Washington
State of Wisconsin
State of Wyoming

Overall CRA Rating and Executive Summary

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

The following table indicates the performance level of **U.S. Bank National Association (USB)** with respect to the Lending, Investment, and Service Tests:

Performance Levels	U.S. Bank National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding	X	X	X
High Satisfactory			
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

- Overall Lending Test performance is rated Outstanding based on excellent lending performance in 27 (of 40) rated areas - including the ten largest rated areas by deposit volume. Lending performance is good in all other rated areas.
- Overall Investment Test performance is rated Outstanding based on excellent investment performance in all 40 rated areas.
- Overall Service Test performance is rated Outstanding based on excellent service performance in 24 (of 40) rated areas - including eight of the ten largest rated areas by deposit volume. Service performance is generally good in the remaining rated areas.

Lending Performance Summary

Overall lending performance is excellent.

- Community development (CD) lending had a significantly positive impact on lending performance in most of the 44 full-scope assessment areas (AAs) (38 AAs or 86 percent). USB originated 1,536 CD loans during the evaluation period with direct (or potential) benefit to its AAs. These loans total nearly \$7.4 billion and represent 21.6 percent of the bank's Tier 1 Capital. Statewide loans (including those with indirect benefit) elevated CD lending performance in four full-scope AAs (Eastern Indiana, Duluth MN, Eastern Oregon, and Bismarck ND). Statewide CD lending otherwise provided additional support or had neutral impact. Regional and national CD loans with only indirect benefit were not significant to bank performance.

- Borrower distributions are at least good in a majority of the 44 full-scope AAs (28 AAs or 64 percent). Borrower distributions in the remaining full-scope areas are adequate (16 AAs or 36 percent). Home mortgage distributions are good in 29 full-scope AAs, adequate in 11, excellent in three, and poor in one. Business loan distributions are good in 31 full-scope AAs, and adequate in 13.
- Geographic distributions are at least good in a majority of the 44 full-scope AAs (36 AAs or 82 percent). Geographic distributions in the remaining full-scope areas are adequate (8 AAs or 18 percent). Home mortgage distributions are good in 20 full-scope AAs, adequate in 18, excellent in five, and poor in one. Business loan distributions are excellent in 23 full-scope AAs, good in 16, and adequate in five.
- Our geographic distribution analysis included a review for lending gaps, particularly in LMI areas. We did not identify any unexplained lending gaps in the full-scope AAs.
- We also determined that lending activity in relation to bank resources and capacity was good to excellent in most of the bank's AAs, and no less than adequate in any AA. Our assessment considered the bank's rank/share of deposits compared to loans and the significant competition from nationwide lenders in most markets.
- Performance differences in limited-scope AAs impacted Lending Test ratings in six states. Weaker performance in limited-scope areas adversely affected Lending Test ratings for the states of Arkansas, Missouri, Oregon, South Dakota, and Wyoming. Stronger performance in limited-scope areas positively affected the Lending Test rating in the state of Montana.

The bank's use of flexible lending programs supports its overall lending performance, even though these programs did not generally elevate performance in individual AAs. In aggregate, the volume of flexible lending represents 63 percent of bank capital. USB offers a wide variety of lending products and programs that support affordable housing and economic development. For example:

- USB offers more than 65 affordable mortgage products involving both national and local programs. These products generated more than 204,000 loans totaling \$38.4 billion over the evaluation period.
- The bank's Mortgage Revenue Bond Program Division partners with various state and local housing finance agencies across the country to facilitate affordable homeownership. USB works directly with municipalities offering these programs to prescreen and approve loan originators. USB subsequently purchases the transactions originated under these programs, which are typically FHA (Federal Housing Administration) loans. These transactions are included in the bank's home mortgage data and the aforementioned affordable mortgage production numbers.
- USB also participates in a number of nationwide, statewide, and local mortgage down payment and special assistance programs. During the evaluation period, the bank facilitated nearly 7,450 instances of assistance (and more than \$40 million grant monies for borrowers) under these programs.

- Through a Private Placement Bond Program, the bank offers financing for the development of affordable housing and community revitalization projects. The program's financing structure brings together the interest-rate price advantages of tax-exempt municipal financing and more traditional streamlined CD loan underwriting to create a lending mechanism that provides both tax-exempt interest rates and lower upfront financing costs. During this evaluation period, the bank made 78 private placements totaling \$655 million.
- USB remains one of the nation's top Small Business Administration (SBA) lenders. The bank was the fourth largest SBA lender by number of loans (2012-2015), ranking second (2012, 2013) and third (2014, 2015) by dollar volume. It is also notable that despite the high ranking by dollar volume, USB had a lower average loan size compared to other SBA lenders. During the evaluation period, the bank originated approximately 11,533 SBA loans nationwide, totaling \$2.6 billion.
- In 2012, USB received a Community Commitment Award for Small Business Lending from the American Bankers Association in recognition of its Community Restoration Funds, a \$1 million revolving loan commitment that makes capital available to pre-approved neighborhood developers working in Milwaukee, Chicago, and Minneapolis as a part of the Neighborhood Stabilization Program (NSP).
- The bank finances small farms through the United States Department of Agriculture Farm Service Agency Guarantee Loan Program. The loans can be for farm ownership or operating purposes, and a portion of program funding is targeted to beginning farmers/ranchers and minority applicants. USB originated 57 loans under this program over the evaluation period totaling \$18.5 million.

The ratio of loans inside the bank's AAs was also a positive factor in our evaluation of lending performance. A majority of USB's reported loans (64 percent by number) are inside its AAs. This ratio excludes affiliate lending and is calculated at the bank level. By product type, 62 percent of home mortgage loans, 65 percent of business loans, and 64 percent of farm loans are inside the bank's AAs.

Investment Performance Summary

Overall investment performance is excellent.

- The volume of AA-specific investments in relation to bank capacity and available opportunity is excellent in most of the bank's full-scope AAs (43 or 98 percent). USB collectively invested more than \$4.9 billion inside its AAs during the evaluation period, representing more than 14 percent of its Tier 1 Capital. The bank had another \$2.8 billion prior period investments inside its AAs that remain outstanding, representing 8.3 percent of Tier 1 Capital. Statewide and regional investments provided additional support or had neutral impact. National investments were not significant to bank performance.

- Investments are responsive to CD needs, with a focus on affordable housing and revitalization and stabilization initiatives. Low-Income Housing Tax Credits (LIHTCs) and mortgage-backed securities (MBSs) are the bank's primary means of funding affordable housing investments. Revitalization and stabilization efforts are typically funded with New Market Tax Credits (NMTCs) and Historic Tax Credits (HTCs).
- USB is a consistent leader in investing through tax credit programs. The U.S. Bancorp Community Development Corporation is an active tax credit investor – including NMTC investments, which are generally more complex and require more staffing/expertise to execute.
- Performance differences in the limited-scope AAs did not impact Investment Test ratings, with one exception. Stronger performance in limited-scope AAs positively impacted the Investment Test rating for the state of Oregon.

Service Performance Summary

Overall service performance is excellent.

- Retail delivery systems are readily accessible in a majority of the 44 full-scope AAs (29 AAs or 66 percent). The remaining full-scope AAs have retail delivery systems that are accessible (11 AAs or 25 percent) or reasonably accessible (four AAs or nine percent). In several markets, retail access is enhanced by branches in middle- and upper-income (MUI) tracts that are in close proximity (across street or within blocks) to low- and moderate-income (LMI) areas.
- Branching activity did not adversely affect retail accessibility in the bank's 44 full-scope AAs. USB opened 145 branches and closed 182 branches bank-wide over the evaluation period. On a net basis, the bank closed branches in geographies of all income levels, including five branches in low-income tracts and 15 branches in moderate-income tracts. Branch closures in full-scope areas were attributed to store closings (31 percent), early lease terminations (25 percent), productivity (18 percent), lease expirations (14 percent), and consolidation/relocation of branches (12 percent).
- In addition to a traditional branch network, the bank offers alternative delivery systems (ADS), including an extensive ATM network, online banking, interactive voice response, a call center, and mobile banking. ADS are available in all USB markets and provide customers more flexibility in choosing delivery channels to suit their needs. Our assessment gave consideration for strong ATM distributions in LMI geographies. In addition, we positively considered ADS in AAs where the bank could reasonably demonstrate higher usage by customers residing in LMI areas. Bank data showed the percentage of customers from each geographic income category that used each alternative delivery channel at least once during 2015.
- We did not identify any branch differences in the full-scope AAs related to product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

- The level of CD service activities is at least good in most of the bank's full-scope AAs (37 AAs or 84 percent). Performance is generally adequate in the remaining full-scope AAs. Activities address a wide variety of CD initiatives, and are most responsive to financial education needs. USB senior leaders also served on the board of directors for 597 nonprofit organizations throughout the bank's footprint, and USB opened more than 2,600 new accounts via its participation in 32 Individual Development Account (IDA) programs over the evaluation period.
- Performance in limited-scope AAs impacted Service Test ratings in four states. Weaker performance in limited-scope areas adversely affected Service Test ratings for the states of Kansas and Nevada. Stronger performance in limited-scope areas positively affected Service Test ratings for the states of Montana and North Dakota.

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, therefore, is an affiliate.

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

Assessment Area (AA): A geographic area that generally consists of one or more metropolitan areas or one or more contiguous political subdivisions, such as counties, cities, or towns, in which the bank has its main office, branches, and deposit-taking ATMs.

Automated Teller Machine (ATM): An automated, unstaffed banking facility owned or operated by, or operated exclusively for, the bank at which cash is dispersed, deposits may be received, and money may be lent.

Census Tract (CT): A small, relatively permanent statistical subdivision of a county, delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have a population between 1,200 and 8,000 people, with an optimal size of 4,000 people.

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas; and loans, investments, and services that support, enable, or facilitate projects or activities under HUD Neighborhood Stabilization Program criteria that benefit low-, moderate-, and middle-income individuals and geographies in the bank's AA(s) - or outside the AA(s) provided the bank has adequately addressed the community development needs of its AA(s).

Community Development Financial Institution (CDFI): Specialized financial institutions that work in market niches that may not be adequately served by traditional financial institutions. CDFIs provide a wide range of financial products and services, including mortgage financing for first-time homebuyers, financing for community facilities, commercial loans and investments to start or expand small businesses, loans to rehabilitate rental housing, and financial services for low-income households and local businesses. In addition, these institutions provide services to help ensure credit is effectively used, such as technical assistance for small businesses and credit counseling for consumers. CDFIs include community development banks, credit unions, loan funds, venture capital funds, and micro-enterprise loan funds, among others.

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

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

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

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

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

Limited-Scope (LS) 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).

LMI: Low- and moderate-income.

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

Low-Income Housing Tax Credit: A program through which investors receive a credit against federal tax owed in return for providing funds to developers to build or renovate housing for low-income households.

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/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) 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 and half have income below.

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

Metropolitan Division (MD): As defined by OMB, a county or group of counties within an MSA that contains an urbanized population of at least 2.5 million. An MD 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 OMB, as having at least one urbanized area with a population of at least 50,000. The MSA comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

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

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

MUI: Middle- and upper-income.

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 evaluation. 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 community development as its primary purpose.

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 will 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 Loans to Businesses: Loans included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

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

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

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

Description of Institution

U.S. Bank National Association (“USB” or “the bank”) is a full-service interstate bank headquartered in Minneapolis, Minnesota. USB is the lead bank subsidiary of U.S. Bancorp, a diversified financial services holding company with \$422 billion assets and more than 65,000 full-time equivalent employees as of year-end 2015. The current company results from a 2001 merger between the former Minnesota-based U.S. Bancorp and the Ohio-based Firststar Corporation. Firststar acquired U.S. Bancorp, retained the U.S. Bancorp name, and moved its corporate headquarters to Minneapolis.

Significant subsidiaries of U.S. Bancorp include the bank, trust companies, investment companies, insurance companies, a company that facilitates sponsorship of affordable housing grant applications, and a company that invests in real estate projects designed to promote community welfare. U.S. Bank National Association ND, a subsidiary of U.S. Bancorp and separately chartered bank, merged into USB on May 13, 2013.

USB is the fifth largest commercial bank in the United States with \$417 billion assets and a large retail base (18.6 million customers) as of year-end 2015. The bank also operates the fourth largest branch network in the country with 3,142 banking offices and 4,896 ATMs, primarily in the Midwest and the West. Key markets include Minneapolis, Cincinnati, Milwaukee, St. Louis, Los Angeles, Chicago, Seattle, Portland (OR), and Denver. Major competitors include Wells Fargo, JP Morgan Chase, Bank of America, BMO Harris, Bank of the West, PNC, and KeyBank.

USB expanded its presence in the Chicago area and the state of Tennessee with two acquisitions during the evaluation period. USB acquired the Chicago banking operations of Charter One Bank from the RBS Citizens Financial Group in January 2014, gaining \$1.1 billion loans, \$5.3 billion deposits, and 84 branches. The acquisition nearly doubled the bank’s deposit base in the Chicago area. USB also acquired the banking operations of BankEast from the FDIC in January 2012, adding \$272 million assets, \$268 million deposits, and ten branches (eight of which are in Knoxville).

USB provides a full range of financial services to individuals, businesses, institutional organizations, and government entities, including lending and depository services, cash management, capital markets, trust services, and investment management services. It also engages in credit card services, merchant and ATM processing, mortgage banking, insurance, brokerage, and leasing. A description of the bank’s four key lines of business follows:

- *Consumer and Business Banking* delivers traditional banking products and services domestically through banking offices, telephone servicing and sales, online services, direct mail, ATM processing, and mobile devices. Products include home mortgage loans, home equity loans and lines of credit, vehicle loans and leases, and small business loans and lines of credit. USB is the seventh largest mortgage originator and servicer in the country and a leading small business lender, consistently ranking as a top SBA lender nationally.

- *Payment Services* offers consumer and business credit cards; stored-value cards; debit cards; corporate, government and purchasing card services; consumer lines of credit; and, merchant processing. USB is the seventh largest merchant processor in the country and ranks eleventh globally, servicing customers across the United States, Canada, Mexico, and segments of Europe.
- *Corporate and Commercial Banking* offers lending, equipment finance and leasing, depository services, treasury management, capital market services, international trade services, and other financial services to middle market, large corporate, commercial real estate, financial institution, nonprofit, and public sector clients across a national footprint.
- *Wealth Management and Investment Services* provides private banking, financial advisory services, investment management, retail brokerage services, insurance, trust, custody and fund servicing across a national footprint. USB ranks as one of the largest providers of corporate trust services in the United States. In addition, corporate trust and fund administration services are offered in Europe.

As of year-end 2015, USB had total assets of \$417 billion, total deposits of \$310 billion, and Tier 1 Capital of \$34 billion. Tier 1 Capital increased 37 percent over the evaluation period, and domestic deposits grew 27 percent. The bank's \$259 billion loan portfolio represents 62 percent of total assets, and is primarily comprised of commercial loans (38 percent), residential real estate loans (32 percent), and consumer loans (19 percent).

Significant subsidiaries of the bank include merchant processing and payment service companies, mortgage companies, property management companies, leasing companies, trust companies, investment service companies, an insurance company, an appraisal company, and a community development corporation. Bank subsidiaries and affiliates do not adversely affect the bank's capacity for community reinvestment. Affiliate activities considered in this CRA evaluation are detailed in Appendix A.

Throughout the evaluation period, the national economy continued to improve from the financial crisis that took hold in 2008. National unemployment levels trended downward and reached near pre-recession levels by year-end 2015. The housing market also rebounded, with home values steadily increasing in most markets (although still short of the national pre-recession peak). Foreclosure rates improved over the evaluation period as well. After peaking at 1.2 million in 2010, the number of nationwide completed foreclosures dropped significantly to approximately 500,000 in 2015.

USB entered into a Bank Secrecy Act/Anti Money Laundering (BSA/AML) Consent Order with the OCC on October 23, 2015, which constricted the bank's branching activities. The Consent Order was terminated November 26, 2018. Aside from the Consent Order, there were no other identified legal, financial, or other factors that impeded the bank's ability to help meet the credit, investment, and service needs of its AAs during the evaluation period. USB received a Satisfactory rating at its previous CRA evaluation, dated March 31, 2012.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation began October 16, 2017. It covered the January 1, 2012, through December 31, 2015 time period, with consideration for community development (CD) activities from April 1, 2012 through December 31, 2015. Because the United States Office of Management and Budget (OMB) revised delineations for several metropolitan statistical areas (MSAs) based on 2010 census data, some AA demographics changed as of January 1, 2014. Data for AAs with demographic changes are separately presented in the same set of tables, and are noted through naming convention (e.g., Chicago-Naperville-Arlington Heights, IL MD 2012-2013, Chicago-Naperville-Arlington Heights, IL MD 2014-2015). Deposits are similarly split between the two periods to accurately reflect the deposits attributable to each period.

Products evaluated under the lending test include home mortgage loans, small loans to businesses, and small loans to farms. Examiners did not, however, analyze distributions for products with less than 25 loans. The bank has several markets with an insufficient number of farm loans and/or multifamily home mortgage loans for meaningful analysis as noted in the narrative comments.

While the bank uses the flexible lending products and programs described in the Overall CRA Rating and Executive Summary section to serve credit needs in multistate metropolitan areas, production is attributed to state rated areas as data was not readily available for all programs at the AA level.

As permitted under the affiliate rule, the lending activities of U.S. Bank National Association ND were considered. Examiners also considered the investment activities of the U.S. Bancorp Community Development Corporation, the U.S. Bancorp Community Investment Corporation, and the U.S. Bank Foundation. Appendix A also provides information on the products and affiliate activities considered in this evaluation.

Data Integrity

Examiners independently tested the accuracy of the home mortgage, business, and farm loan data publicly reported by the bank and considered in this evaluation. While no significant errors were identified in home mortgage data, the bank revised its 2014-2015 business and farm loan data to exclude unsecured loans to nonprofit businesses and accurately report loan location. Examiners validated and used the revised data in this evaluation. The errors did not have a material impact on the accuracy of market share data.

Examiners also independently tested the bank's CD loans, investments, and services to confirm the activities met the regulatory definition and otherwise qualified for consideration. No concerns were identified and the CD information presented in this performance evaluation is considered reliable.

Selection of Areas for Full-Scope Review

Examiners selected at least one AA for full-scope review from each state and multistate metropolitan area (MMA) where the bank has an office. A total of 44 AAs received a full-scope review. The bank has 268 AAs across 40 rated areas (26 states and 14 multistate metropolitan areas) as of December 31, 2015, which is reduced to 178 AAs when the nonmetropolitan AAs are combined into a single nonmetropolitan AA per state for analysis. Appendix A lists all of the bank's AAs and the type of review each area received. The full-scope AAs are also detailed in the Scope of Evaluation section for each rated area, and Appendix C contains market profiles for the full-scope AAs.

During the evaluation period, the OMB revised the delineations for several metropolitan areas based on 2010 census data. The changes, which were effective in 2014, eliminated two bank AAs. The counties that comprised the former Sandusky and Toledo MSAs became part of the bank's nonmetropolitan AAs in the state of Ohio.

Ratings, Weighting and Other Considerations

USB's overall rating is a blend of MMA and state ratings, weighted by their pro rata share of the bank's deposit base. MMA and state ratings consider performance in both full-scope and limited-scope AAs, and are also similarly weighted. The influence of limited-scope AAs in arriving at the overall MMA or state rating is detailed in the narrative comments.

Ten rated areas carry the most weight in the bank's performance evaluation as they collectively account for 82 percent of its deposits by dollar volume. These rated areas and the percentage of the bank deposits each represents are: the Minneapolis MMA (21.4 percent), the Cincinnati MMA (13.9 percent), the state of California (12.2 percent), the state of Wisconsin (10.7 percent), the St. Louis MMA (5.0 percent), the state of Washington (4.8 Percent), the state of Colorado (4.2 percent), the Chicago MMA (4.0 percent), the Portland MMA (3.5 percent), and the state of Ohio (2.3 percent). All other rated areas individually account for less than 2 percent of the bank's deposit base.

With regard to retail lending performance weighting:

- We placed more weight on borrower and geographic distributions than market share performance. Distributions reflect performance over the entire evaluation period, whereas market shares are based on a single year (2015 for the 2012-2015 AAs or 2014-2015 AAs, and 2013 for the 2012-2013 AAs).
- When there were performance differences between loan products, including subcategories of home mortgage loans, products were weighted based on the loan mix specific to the AA over the evaluation period (by number of loans) in determining an overall conclusion. Weightings are fully described in the narrative comments. Weighting by number of loans gives credit for each lending decision regardless of the loan's dollar amount.
- Product performance between the first half (2012-2013) and second half (2014-2015) of the evaluation period was weighted equally unless noted otherwise. If emphasis was needed to reach an overall performance conclusion, the period with more loan production (by number of loans) was weighted more heavily.

- Performance between low- and moderate-income categories was weighted equally unless noted otherwise. If emphasis was needed to reach an overall performance conclusion, the category with more lending opportunity (e.g., more businesses, owner-occupied housing units, or families) was weighted more heavily.

The geographic distribution analysis for full-scope areas included a lending gap review, particularly in LMI areas. Lending gap analysis results are presented in the Overall CRA Rating and Executive Summary section and in the overall geographic conclusion for each individual full-scope AA.

When lending distributions appeared less than adequate in comparison to market demographics, we may have supplemented the evaluation with market aggregate analysis. The decision to use market aggregate analysis was based on several factors, including the share of bank deposits in the rated area, the significance of an individual loan product to overall lending performance in the full-scope AA, and the robustness of HMDA data (for nonmetropolitan AAs). Aggregate analysis compares bank performance to the performance of other lenders in the market, and can be insightful when there are contextual impediments that make it difficult for lenders to achieve demographic parity.

The use of market aggregate analysis, and impact on performance conclusions, is detailed in the narrative performance comments. In summary, market aggregate comparisons were used to analyze borrower distributions in markets with high housing costs (Los Angeles, Denver, West Palm Beach, Las Vegas, Salem, Seattle), and to analyze borrower distributions for low-income persons, who have more limited capacity for home ownership. Market aggregate comparisons were also used to analyze geographic distributions in markets with limited lending opportunity in low-income tracts (Clarksville, Grand Forks), high foreclosure rates (Cleveland), and identified needs for affordable housing (Chicago, Cincinnati, Clarksville, Davenport, Las Vegas, Bismarck, Columbus, Milwaukee), or for strategies to address vacant/abandoned properties (Kansas City, St. Louis). Market aggregate comparisons were also used to analyze home refinance distributions (both geographic and borrower) given the interest rate environment during the evaluation period (slightly rising, which lessened product demand), and also because the fixed costs of refinancing can be an impediment to LMI borrowers as it takes longer to recoup those costs through interest savings on smaller loans.

The investment analysis considers qualified investments, as well as donations and grants, that were made during the evaluation period. These “current period investments” are considered at the original investment amount. Our assessment also includes qualified investments made in a prior period that remain outstanding, which are considered at the year-end 2015 book value. To provide perspective regarding the relative level of qualified investments, investment volume was compared to the volume of “allocated Tier 1 capital,” which is based on the pro rata allocation of deposits by AA, rated area, or region, as applicable. Unless noted otherwise, the complexity of investments was typical for a financial institution of this size and capacity.

Our evaluation of CD lending and investment performance considers anomalies in the way the bank aggregates and reports deposits. Approximately 22 percent (or \$61 billion) of the bank's deposits consist of bond sales, brokered deposits, worldwide client deposits, escrow and other accounts, which are attributed to just four markets for administration purposes – Minneapolis (\$26.5 billion), Cincinnati (\$18.5 billion), Milwaukee (\$15.4 billion), and Owensboro (\$327 million). This volume of centralized, nonlocal deposits was a consideration in our performance conclusions for these markets.

In the service performance assessment, we gave the most weight to the geographic distribution of bank branches and changes in branch locations. In the full-scope AAs, we also considered nearby branches in MUI tracts that improved access for LMI areas or individuals. Such consideration was only provided when we could verify (through visual observation of branch maps) that the MUI branch was located across the street from an LMI geography or within a few blocks (generally less than one-quarter mile). Branch hours, products, and services, as well as alternative delivery systems and CD services, received a lesser amount of weight.

Weighting and other performance context considerations are more fully described, as applicable, in the conclusions for each rated area.

Community Contacts

We conducted new community contacts and/or used recent community contacts by other regulators in all 44 full-scope AAs. Contacts were made with a wide variety of small business, affordable housing, neighborhood revitalization, economic development, and social service representatives. Community contact information is summarized in the Market Profiles in Appendix C.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) in determining a national bank's CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development (HUD), and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution, or any affiliate whose loans have been considered as part of the institution's lending performance, has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

MULTISTATE METROPOLITAN RATED AREAS

Chicago-Naperville-Elgin, IL-IN-WI Multistate Metropolitan Area (Chicago MMA)

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance in the full-scope AA based on investment activity (with consideration for the strong level of investment competition in this market) and responsiveness to identified community development needs for revitalization/job creation and affordable housing.
- Good service performance in the full-scope AA based on accessible retail delivery systems (with consideration for adjacent MUI branches, ATM distributions, and ADS usage) and excellent CD service performance, including services that are responsive to an identified community development need for financial education.
- Performance differences in the limited-scope AAs did not affect MMA ratings.

Refer to Tables 1-15 in the Chicago MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Chicago MMA

The Chicago MMA is the bank's 8th largest rated area based on deposits. It accounts for \$11.0 billion (4.0 percent) of bank deposits, 168 (5 percent) of bank branches, 235 (5 percent) of bank ATMs, and 102,021 (6 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has three AAs in this rated area, all of which are metropolitan areas. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Chicago MMA

We performed a full-scope review of the Chicago AA, which includes five (of six) counties in the Chicago-Naperville-Arlington Heights MD as of year-end 2015. Other AAs received limited-scope reviews.

The Chicago AA is the bank's largest AA in this rated area based on deposits. It accounts for \$10.1 billion (93 percent) of rated area deposits, 152 (90 percent) of rated area branches, 215 (91 percent) of rated area ATMs, and 87,884 (86 percent) of rated area loans. The bank's mix of loans reported in this area (by number, excluding CD loans) is 51 percent home mortgage loans and 49 percent business loans. The bank has an insufficient number of reported farm loans in this market for meaningful analysis.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Chicago AA.

LENDING TEST

Lending Test performance in the Chicago MMA is rated Outstanding. Bank performance in the full-scope Chicago AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Chicago AA)

Bank performance in the full-scope Chicago AA is excellent based on an excellent level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Chicago AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked 10th of 174 banks in area deposits as of June 30, 2015, with \$10.1 billion deposits and a 3 percent deposit market share.
- During the evaluation period, the bank reported \$11.2 billion home mortgage, business, and farm loans in the AA. It also originated \$274 million in CD loans specific to the AA.
- Of all loans reported in the Chicago AA for the year 2015, the bank ranked fourth in the number and dollar volume of home mortgage loans, and fourth in the number of business loans (seventh by dollar volume). The bank's lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Chicago AA is good, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of multifamily and business loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Chicago AA is adequate based on excellent home purchase, good home improvement, and poor home refinance distributions. Our assessment gives the most weight to home refinance and home purchase loans, as these products respectively account for 55 percent and 42 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is excellent overall. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported home purchase loans.
 - The geographic distribution of home purchase loans in the 2014-2015 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
 - The geographic distribution of home purchase loans in the 2012-2013 period is good.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise adequate performance in low-income tracts to good. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall.
 - The geographic distribution of home improvement loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.

- The geographic distribution of home improvement loans in the 2014-2015 period is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is poor.
 - The geographic distribution of home refinance loans in the 2012-2013 period is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is lower than its overall product share.
 - The geographic distribution of home refinance loans in the 2014-2015 period is poor overall.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is lower than its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Chicago AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Chicago AA is excellent. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported business loans.

- The geographic distribution of reported business loans in the 2014-2015 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share.
- The geographic distribution of reported business loans in the 2012-2013 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Chicago AA is adequate, as evidenced by an adequate distribution of home mortgage loans and a good distribution of business loans. Our assessment weights home mortgage loans more than business loans as they account for a larger share of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Chicago AA is adequate based on good home purchase, good home improvement, and adequate home refinance distributions. Our assessment gives the most weight to home refinance loans as they account for 55 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported home purchase loans.
 - The borrower distribution of home purchase loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
 - The borrower distribution of home purchase loans in the 2012-2013 period is adequate overall.

- Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is lower than its overall product share.
- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home refinance loans.
 - The borrower distribution of home refinance loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Market aggregate analysis elevates otherwise adequate performance in the moderate-income sector to good. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home refinance lending to moderate-income borrowers by other lenders. The bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

- The borrower distribution of home refinance loans in the 2014-2015 period is good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Chicago AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Chicago AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 48 CD loans totaling \$273.8 million during the evaluation period. By dollar volume, 60 percent of these loans provide affordable housing to LMI persons (651 units created or rehabilitated), 35 percent support community services for LMI persons, 4 percent fund community revitalization projects, and the remainder promote economic development. The dollar volume of CD lending represents 43 percent of allocated Tier 1 Capital for the Chicago AA.

CD loans include:

- Term financing for a 227-unit apartment building, with 152 units allocated to tenants earning 60 percent or less of the area median income.
- Term financing for a 145-unit housing complex for seniors, with all units allocated to tenants earning 65 percent or less of the area median income.
- A working capital line of credit to a hospital whose charity health care for LMI patients constitutes a majority of its service costs.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited scope AAs did not impact the Lending Test rating for the Chicago MMA. Lending performance is consistent/excellent in the Lake County-Kenosha County AA. Lending performance is weaker/adequate in the Elgin AA, representing 2 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending and geographic distributions.

INVESTMENT TEST

Investment Test performance in the Chicago MMA is rated Outstanding. Bank performance in the full-scope Chicago AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Chicago AA)

Bank performance in the full-scope Chicago AA is excellent in relation to bank capacity, identified needs, and available investment opportunities. Our assessment also gives consideration to the strong level of competition for investments in this market.

USB demonstrated an excellent level of investment activity. The bank made 285 investments totaling \$217.5 million during the evaluation period, plus another 613 qualifying grants and donations totaling \$9.2 million to at least 145 organizations. At year-end 2015, the bank also has 41 prior period investments with an aggregate outstanding balance of \$29.8 million and seven unfunded commitments totaling \$858 thousand. The dollar volume of investments (excluding unfunded commitments) represents 20.4 percent of allocated Tier 1 Capital for the Chicago AA.

Investments are particularly responsive to identified community development needs for revitalization/job creation and affordable housing. Most current period investments (\$196.4 million or 86.6 percent) serve these needs, including:

- Nineteen NMTCs totaling \$61.7 million to redevelop the site of a former steel plant into a retail complex. The project generated more than 70,000 square feet of new retail space and 750 permanent jobs. The complex also includes a full-service grocery in an area that was previously considered one of the largest and most intractable food deserts in the city of Chicago.
- A \$17.5 million LIHTC to develop an affordable apartment complex with all 78 units targeted to families earning 60 percent or less of the area median income (AMI). The apartment complex includes universal design features for all units, four accessible units, 12 adaptable units, and two units built for persons with visual and hearing impairments.
- Twenty-nine LIHTCs totaling \$17.6 million to construct an affordable low-income apartment complex with 45 units targeted to residents earning 60 percent or less of the AMI and 15 units targeted to persons with disabilities earning 30 percent or less of the AMI.

Because the bank was responsive to community development needs and opportunities in the Chicago AA, broader regional investments that provide only indirect benefit were considered and have a neutral impact on performance. The bank has 99 regional investments (current and prior period) totaling \$106.8 million, and four unfunded commitments totaling \$10.5 million, in the broader East North Central Division, which includes the states of Illinois, Indiana, Ohio, and Wisconsin. The dollar volume of these regional investments (excluding unfunded commitments) represents 1.8 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Chicago MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited scope AAs did not impact the Investment Test rating for the Chicago MMA. Investment performance is consistent/excellent in the Lake County-Kenosha County AA. Investment performance is weaker/poor in the Elgin AA, representing 2 percent of rated area deposits. Weaker performance is attributable to a lower relative investment volume.

SERVICE TEST

Service Test performance in the Chicago MMA is rated High Satisfactory. Bank performance in the full-scope Chicago AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Chicago AA)

Bank performance in the Chicago AA is good based on accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Chicago AA. Our assessment recognizes MUI branches in close proximity to LMI geographies and positively considers ATM distributions and ADS usage. The bank has ten branches in low-income geographies and 22 branches in moderate-income geographies. The percentage of branches in both low- and moderate-income areas is somewhat lower than the percentage of the population respectively residing in each area. However, there are 19 MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is also expanded by overall good ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Discretionary branching activity has not adversely affected access to banking services. The bank opened eight branches and closed 12 branches during the evaluation period. There were four net branch closures in LMI geographies. One low-tract branch was consolidated into another branch as part of the bank's acquisition of Charter One. The surviving branch is also located in a low-tract, less than a half mile from the closed branch. The three moderate-tract branch closures result from grocery store closures that were not within bank control. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Chicago AA based on the bank's relative level of services provided, demonstrated leadership, and responsiveness to an identified community development need for financial education, including foreclosure prevention and homeownership counseling. The bank provided 285 qualified service activities involving 79 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 130 of those activities.

Service activities address a variety of CD initiatives and are responsive to identified needs for foreclosure prevention and loss mitigation, homebuyer education, and general financial literacy. Service activity examples during the evaluation period include:

- Bank staff provided 152 financial education programs to nearly 3,200 participants, including financially distressed homeowners, first-time homebuyers, small businesses, and youth.
- A bank employee provided approximately 125 service hours as a three-year board member of an organization that provides a full range of services promoting responsible and sustainable homeownership, with an emphasis on serving first-time homebuyers, LMI households, and homeowners in crisis.
- A bank employee provided more than 120 service hours as a three-year board member (including one year as Treasurer) of an organization that provides professional support to job seekers, a majority of whom are LMI persons.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the Chicago MMA. Service performance is consistent/good in the Lake County-Kenosha County AA. Service performance is weaker/adequate in the Elgin AA, representing 2 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

Cincinnati, OH-KY-IN Multistate Metropolitan Area (Cincinnati MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, good geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity (with consideration for the bank's large volume of centralized, non-local deposits in this market) and responsiveness to identified community development needs for economic development/small business financing and affordable housing.
- Excellent service performance based on readily accessible retail delivery systems and excellent CD service performance.

Refer to Tables 1-15 in the Cincinnati MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Cincinnati MMA

The Cincinnati MMA is the bank's 2nd largest rated area based on deposits. It accounts for \$38.9 billion (13.9 percent) of bank deposits, 118 (4 percent) of bank branches, 149 (3 percent) of bank ATMs, and 42,990 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Cincinnati AA), which includes 11 (of 15) counties in the Cincinnati MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Cincinnati MMA

We performed a full-scope review of the Cincinnati AA and rated the Cincinnati MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 59 percent business loans, 40 percent home mortgage loans, and 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Cincinnati AA.

LENDING TEST

Lending Test performance in the Cincinnati MMA is rated Outstanding. Bank performance in the Cincinnati AA is excellent based on a good level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Cincinnati AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment. Our assessment also considers the large volume of centralized nonlocal deposits the bank attributes to this market.

- USB ranked first of 65 banks in area deposits as of June 30, 2015, with \$38.9 billion deposits and a 43.2 percent deposit market share. Excluding the large volume of centralized nonlocal deposits (\$18.5 billion), the bank would have a second-place deposit rank and 23 percent deposit market share.
- During the evaluation period, the bank reported \$3.2 billion home mortgage, business, and farm loans in the AA. It also originated \$218 million in CD loans specific to the AA.
- Of all loans reported in the Cincinnati AA for the year 2015, the bank ranked fifth in the number and dollar volume of home mortgage loans, first in the number of business loans (third by dollar volume), and first in the number and dollar volume of farm loans. Lending market shares are less than the bank's deposit market share due to the large volume of centralized nonlocal deposits. Additionally, this is a competitive market for home mortgage lending (more than 490 reporters) and business lending (115 reporters).

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Cincinnati AA is good, as evidenced by good distributions of home mortgage, multifamily, and business loans, an excellent distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Cincinnati AA is good based on good home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase loans.
 - The geographic distribution of home purchase loans in the 2012-2013 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is somewhat lower than its overall product share.

- The geographic distribution of home purchase loans in the 2014-2015 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall.
 - The geographic distribution of home improvement loans in the 2012-2013 period is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in both low- and moderate-income geographies exceeds its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is adequate overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies equals the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is good.
 - The geographic distribution of home refinance loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and only somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is near its overall product share.
 - The geographic distribution of home refinance loans in the 2014-2015 period is good overall.

- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is somewhat lower than its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Cincinnati AA is good. The percentage of bank loans in low-income geographies is somewhat lower than, and in moderate-income geographies exceeds, the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Cincinnati AA is good. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported business loans.

- The geographic distribution of reported business loans in the 2014-2015 period is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.
- The geographic distribution of reported business loans in the 2012-2013 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Cincinnati AA is excellent.

- Market analysis elevates otherwise poor performance in low-income tracts to excellent. While the percentage of bank loans in low-income geographies is significantly below the demographic comparator, the bank's market share of farm loans in low-income geographies exceeds its overall product share. Market share reports reflect that of all reporting lenders, the bank reported the most farm loans in low-income geographies during the evaluation period.
- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Cincinnati AA is good, as evidenced by good distributions of home mortgage loans, business loans, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Cincinnati AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good.
 - The borrower distribution of home purchase loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers essentially equals its overall product share.
 - The borrower distribution of home purchase loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.

- Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Cincinnati AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than (or near) the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Cincinnati AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Cincinnati AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities, with consideration of the bank's large volume of centralized nonlocal deposits in this market (described in the Lending Activity section). The bank made 62 CD loans totaling \$217.8 million during the evaluation period. By dollar volume, 65 percent of these loans fund community revitalization projects, 23 percent provide affordable housing to LMI persons (672 units created or rehabilitated), 9 percent support community services for LMI persons, and the remainder promote economic development. The dollar volume of CD lending represents 9 percent of allocated Tier 1 Capital for the Cincinnati AA.

CD loans include:

- Construction financing, as part of a larger urban renewal project, to rehabilitate a retail center and mixed-use office building and to create new jobs for LMI persons.
- A senior-leverage loan, originated as part of a larger financing package, to build a mixed-use development (residential, retail, and commercial) in a distressed low-income geography. The project creates 36 units of affordable housing for tenants earning 80 percent or less of area median income. It also provides leased space for a medical provider to service persons with Medicaid or no health insurance.
- A loan to refinance an affordable housing complex in a moderate-income census tract, with all 168 units allocated to tenants earning 80 percent or less of the area median income.

Regional CD lending has a neutral impact on performance. The bank made one CD loan totaling \$6.6 million in the East South Central Division, which includes the states of Alabama, Kentucky, Mississippi, and Tennessee. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Cincinnati AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of Kentucky and Tennessee, as well as the multistate metropolitan areas of Cincinnati, Clarksville, and Louisville.

INVESTMENT TEST

Investment Test performance in the Cincinnati MMA is rated Outstanding. Bank performance in the Cincinnati AA is excellent in relation to bank capacity, identified needs, and available investment opportunities. Our assessment also gives consideration for the bank's large volume of centralized, non-local deposits in this market (as described in the Lending Activity and Market Profile sections).

USB demonstrated an excellent level of investment activity. The bank made 425 investments totaling \$211.2 million during the evaluation period, plus another 311 qualifying grants and donations totaling \$2.7 million to at least 100 organizations. At year-end 2015, the bank also has 167 prior period investments with an aggregate outstanding balance of \$63.8 million and five unfunded commitments totaling \$8.8 million. The dollar volume of investments (excluding unfunded commitments) represents 5.9 percent of allocated Tier 1 Capital for the Cincinnati AA.

Investments are particularly responsive to identified community development needs for economic development/small business financing and affordable housing. Most current period investments (\$151.1 million or 70.7 percent) serve these needs, including:

- Forty-seven bonds totaling \$89 million that provide funding for SBA guaranteed/ insured 504 Certified Development Loans to small businesses in the Cincinnati AA.
- A combination of 32 LIHTCs, six HTCs, and three NMTCs totaling \$9.6 million to fund a multi-phased project that will ultimately provide 126 apartments (including affordable units for LMI persons), 28 condominiums, 17,600 square feet of commercial space, a 340-space parking garage, and valuable green space in a low-income and designated distressed area.
- Grant funding of \$15,000 to renovate four abandoned properties in a low-income area, which created 15 new affordable housing units - including much needed three bedroom homes for larger LMI families.

SERVICE TEST

Service Test performance in the Cincinnati MMA is rated Outstanding. Bank performance in the Cincinnati AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Cincinnati AA. The bank has nine branches in low-income geographies and 27 branches in moderate-income geographies. The percentage of branches in low- and moderate-income tracts approximates or exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

Discretionary branching activity has not adversely affected access to banking services. The bank opened three branches and closed six branches during the evaluation period. There were net closures in moderate-income tracts (two branches) and middle-income tracts (one branch). One moderate-tract branch closure results from a grocery store closure that was not within bank control. Despite the closures, the bank maintains an excellent branch distribution in moderate-income areas. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Cincinnati AA based on the bank's high level of services provided and strong leadership. The bank provided 514 qualified service activities involving 114 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 247 of those activities and more than 4,300 related service hours.

Service activities address a variety of CD initiatives, including financial education. Service activity examples during the evaluation period include:

- A bank employee provided 55 service hours as a two-year Chair and one-year Vice President of a board for an affordable housing organization.
- A bank employee provided nearly 75 service hours as a three-year board member of an organization that works to eliminate blight and revitalize LMI communities through real estate investments.
- Bank staff provided 266 financial education programs to more than 5,000 participants, including first-time homebuyers, small businesses, and youth. The bank also maintains an Individual Development Account program relationship with a local nonprofit organization.

Clarksville, TN-KY Multistate Metropolitan Area (Clarksville MMA)

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

The major factors that support this rating include:

- Good lending performance based on adequate borrower distributions, adequate geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise adequate lending performance to good.
- Excellent investment performance based on investment activity, responsiveness to an identified community development need for economic development/small business financing, and the additional support of regional investments.
- Excellent service performance based on readily accessible retail delivery systems (with emphasis on moderate-income areas) and good CD service performance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Clarksville MMA

The Clarksville MMA is the bank's 35th largest rated area based on deposits. It accounts for \$309 million (<1 percent) of bank deposits, 12 (<1 percent) of bank branches, 15 (<1 percent) of bank ATMs, and 3,662 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Clarksville AA), which includes two (of three) counties in the Clarksville MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Clarksville MMA

We performed a full-scope review of the Clarksville AA and rated the Clarksville MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 50 percent home mortgage loans, 46 percent business loans, and 4 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Clarksville AA.

LENDING TEST

Lending Test performance in the Clarksville MMA is rated High Satisfactory. Bank performance in the Clarksville AA is good based on a good level of lending activity, adequate overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise adequate lending performance to good.

Lending Activity

Lending levels in the Clarksville AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fourth of 14 banks in area deposits as of June 30, 2015, with \$309 million deposits and a 9.8 percent deposit market share.
- During the evaluation period, the bank reported \$314 million home mortgage, business, and farm loans in the AA. It also originated \$7 million in CD loans specific to the AA.
- Of all loans reported in the Clarksville AA for the year 2015, the bank ranked seventh in the number and dollar of home mortgage loans, first in the number and dollar volume of business loans, and first in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 255 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Clarksville AA is adequate, as evidenced by adequate distributions of home mortgage and business loans, a good distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Clarksville AA is adequate based on adequate home refinance, poor home purchase, and very poor home improvement distributions. Our assessment gives the most weight to home refinance and home purchase loans, as these products respectively account for 57 percent and 38 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is poor.
 - Market aggregate analysis elevates otherwise very poor performance in moderate-income tracts to poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home purchase lending in moderate-income geographies by other lenders. The bank's market share of home purchase loans in moderate-income geographies is lower than its overall product share.

- Market aggregate analysis elevates otherwise very poor performance in low-income tracts to poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home improvement loans is very poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is lower than its overall product share. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects a total of one home improvement loan in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Clarksville AA is adequate.

- Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of business loans in low-income geographies is lower than its overall product share.
- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Clarksville AA is good. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (12 farms). The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is near its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Clarksville AA is adequate, as evidenced by an adequate distribution of home mortgage loans, and good distributions of business and farm loans. Our assessment gives the most weight to home mortgage loans as they account for the largest number of the bank's reported loans in this AA.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Clarksville AA is adequate based on a good home purchase, adequate home improvement, and adequate home refinance distributions.

- The borrower distribution of home purchase loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Clarksville AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Clarksville AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Clarksville AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made five CD loans totaling \$7.2 million during the evaluation period. By dollar volume, 99 percent of these loans provide affordable housing to LMI persons, and the remainder support community services for LMI persons. CD loans include construction-to-permanent financing to build an 80-unit senior housing facility, with all units allocated to tenants earning 60 percent or less of area median income. The dollar volume of CD lending represents 19 percent of allocated Tier 1 Capital for the Clarksville AA.

Regional CD lending has a neutral impact on performance. The bank made one CD loan totaling \$6.6 million in the East South Central Division, which includes the states of Alabama, Kentucky, Mississippi, and Tennessee. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Clarksville AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of Kentucky and Tennessee, as well as the multistate metropolitan areas of Cincinnati, Clarksville, and Louisville.

INVESTMENT TEST

Investment Test performance in the Clarksville MMA is rated Outstanding. Bank performance in the Clarksville AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 11 investments totaling \$3.3 million during the evaluation period, plus another 56 qualifying grants and donations totaling \$152 thousand to at least 21 organizations. The bank also has 14 prior period investments with an aggregate outstanding balance of \$2.4 million. The dollar volume of investments represents 15.7 percent of allocated Tier 1 Capital for the Clarksville AA.

Investments are particularly responsive to an identified community development need for economic development/small business financing. Most current period investments (\$3.1 million or 89.9 percent) serve this need, including eight bonds totaling \$3.1 million that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Clarksville AA.

Because the bank was responsive to community development needs and opportunities in the Clarksville AA, broader regional investments that provide only indirect benefit were considered and further support performance. The bank has 104 regional investments (current and prior period) totaling \$197.8 million, and eight unfunded commitments totaling \$11.8 million, in the East South Central Division, which includes the states of Kentucky and Tennessee. The dollar volume of these regional investments (excluding unfunded commitments) represents 31.1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Clarksville MMA.

SERVICE TEST

Service Test performance in the Clarksville MMA is rated Outstanding. Bank performance in the Clarksville AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Clarksville AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of low-income areas. The bank has no branches in low-income geographies and four branches in moderate-income geographies. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Clarksville AA based on the bank's relative level of services provided and some demonstrated leadership. The bank provided 59 qualified service activities involving 25 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 31 of those activities, although the average number of related service hours was limited. Most service activities address financial education needs. Bank staff provided 27 financial education programs to nearly 800 participants, including small businesses and youth.

Davenport–Moline–Rock Island, IA–IL Multistate Metropolitan Area (Davenport MMA)

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

The major factors that support this rating include:

- Excellent lending performance is based on good borrower distributions, adequate geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to an identified community development need for economic development/small business financing.
- Good service performance based on accessible retail delivery systems and excellent CD service performance, including services that are responsive to an identified community development need for small business technical assistance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Davenport MMA

The Davenport MMA is the bank's 32nd largest rated area based on deposits. It accounts for \$605 million (<1 percent) of bank deposits, 11 (<1 percent) of bank branches, 17 (<1 percent) of bank ATMs, and 9,264 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Davenport AA), which includes three (of four) counties in the Davenport MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Davenport MMA

We performed a full-scope review of the Davenport AA and rated the Davenport MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 59 percent home mortgage loans, 40 percent business loans, and 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Davenport AA.

LENDING TEST

Lending Test performance in the Davenport MMA is rated Outstanding. Bank performance in the Davenport AA is excellent based on an excellent level of lending activity, adequate overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Davenport AA reflect excellent responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fourth of 34 banks in area deposits as of June 30, 2015, with \$605 million deposits and an 8.4 percent deposit market share.
- During the evaluation period, the bank reported \$863 million home mortgage, business, and farm loans in the AA. It also originated \$32 million in CD loans specific to the AA.
- Of all loans reported in the Davenport AA for the year 2015, the bank ranked third in the number and dollar volume of home mortgage loans, first in the number of business loans (third by dollar volume), and third in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 265 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Davenport AA is adequate, as evidenced by adequate distributions of home mortgage and business loans, a poor distribution of farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Davenport AA is adequate based on a good home purchase distribution, an adequate home improvement distribution, and a poor home refinance distribution.

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and only somewhat lower than) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is near its overall product share.

- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is lower than its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Davenport AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies is somewhat lower than its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Davenport AA is poor. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income tracts (13 farms). Context and market analysis elevate otherwise very poor performance in moderate-income tracts to poor. While the bank did not report any farm loans in moderate-income geographies during the evaluation period, farm lending opportunities are limited (89 farms). The 2015 market share report reflects a total of seven farm loans in moderate-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Davenport AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Davenport AA is good based on good home purchase, good home refinance, and adequate home improvement distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Davenport AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Davenport AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Davenport AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 18 CD loans totaling \$31.7 million during the evaluation period. By dollar volume, 74 percent of these loans fund revitalization projects, 20 percent support community services for LMI persons, and 6 percent provide affordable housing to LMI persons. CD loans include a construction-to-permanent loan, originated as part of a new market tax credit project, to build a large manufacturing operation in a low-income census tract. The project retains 375 existing jobs and creates 50 new jobs. The dollar volume of CD lending represents 43 percent of allocated Tier 1 Capital for the Davenport AA.

INVESTMENT TEST

Investment Test performance in the Davenport MMA is rated Outstanding. Bank performance in the Davenport AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 13 investments totaling \$7.6 million during the evaluation period, plus another 34 qualifying grants totaling \$251 thousand to at least 11 organizations. The bank also has 18 prior period investments with an aggregate outstanding balance of \$3.7 million. The dollar volume of investments represents 15.7 percent of allocated Tier 1 Capital for the Davenport AA.

Investments are particularly responsive to an identified community development need for economic development/small business financing. Most current period investments (\$5.1 million or 64.8 percent) serve this need, including eight bonds totaling \$5.1 million that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Davenport AA.

SERVICE TEST

Service Test performance in the Davenport MMA is rated High Satisfactory. Bank performance in the Davenport AA is good based on accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Davenport AA. The bank has two branches in low-income geographies and one branch in moderate-income geographies. The percentage of branches in low-income tracts exceeds, and the percentage of branches in moderate-income tracts is somewhat lower than, the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Davenport AA based on the bank's relative level of services provided, strong leadership, and responsiveness to an identified community development need for small business technical assistance. The bank provided 85 qualified service activities involving 24 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 35 of those activities with more than 800 related service hours. Most service activities address financial education needs. Bank staff provided 50 financial education programs to nearly 1,200 participants, including small businesses, first-time homebuyers, and youth. The bank also offered a payments processing seminar, which was particularly responsive to an identified need for small business technical assistance.

Fargo, ND–MN Multistate Metropolitan Area (Fargo MMA)

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

The major factors that support this rating include:

- Excellent lending performance is based on adequate borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to an identified community development need for affordable housing.
- Excellent service performance based on readily accessible retail delivery systems and good CD service performance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Fargo MMA

The Fargo MMA is the bank's 33rd largest rated area based on deposits. It accounts for \$539 million (<1 percent) of bank deposits, seven (<1 percent) of bank branches, 25 (1 percent) of bank ATMs, and 10,385 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Fargo AA), which consists of the entire Fargo MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Fargo MMA

We performed a full-scope review of the Fargo AA and rated the Fargo MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 51 percent business loans, 48 percent home mortgage loans, and 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Fargo AA.

LENDING TEST

Lending Test performance in the Fargo MMA is rated Outstanding. Bank performance in the Fargo AA is excellent based on an excellent level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Fargo AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked third of 27 banks in area deposits as of June 30, 2015, with \$539 million deposits and an 8.3 percent deposit market share.
- During the evaluation period, the bank reported \$960 million home mortgage, business, and farm loans in the AA. It also originated \$116 million in CD loans specific to the AA.
- Of all loans reported in the Fargo AA for the year 2015, the bank ranked first in the number and dollar volume of home mortgage loans, first in the number of business loans (sixth by dollar volume), and fifth in the number of farm loans (seventh by dollar volume). The bank's home mortgage and business lending market shares (by number) exceed its deposit market share. While the bank's farm lending shares are less than its deposit market share, farm loans represent only 1 percent of the bank's lending in this market (by number of loans).

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Fargo AA is good, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of business and farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Fargo AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.

- Performance in low-income tracts is very poor. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects a total of six home improvement loans in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Fargo AA is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income exceeds its overall product share. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Fargo AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share. While the bank's market share of farm loans in low-income geographies is significantly below its overall product share, the 2015 market share report reflects a total of only four farm loans in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Fargo AA is adequate, as evidenced by a good distribution of home mortgage loans, an adequate distribution of business loans, and a poor distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Fargo AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is good. The percentage of bank loans to low-income borrowers essentially equals the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is lower than its overall product share. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Fargo AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Fargo AA is poor. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is somewhat lower than its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Fargo AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made eight CD loans totaling \$116.3 million during the evaluation period. By dollar volume, 93 percent of these loans fund revitalization projects, and 7 percent support community services and affordable housing for LMI persons. CD loans include two lines of credit for remediation projects in a flood area encompassing six LMI geographies, a SBA-designated HUBZone, and a city-designated Renaissance zone. The project will avert up to \$10 billion in flood damages and potentially save lives. The dollar volume of CD lending represents 177 percent of allocated Tier 1 Capital for the Fargo AA.

INVESTMENT TEST

Investment Test performance in the Fargo MMA is rated Outstanding. Bank performance in the Fargo AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 74 investments totaling \$10.8 million during the evaluation period, plus another 46 qualifying grants and donations totaling \$284 thousand to at least 14 organizations. The bank also has 35 prior period investments with an aggregate outstanding balance of \$7.3 million. The dollar volume of investments represents 27.9 percent of allocated Tier 1 Capital for the Fargo AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$6.8 million or 61.5 percent) serve this need, including:

- A \$4.2 million LIHTC to construct an affordable apartment complex for seniors. All 30 units are reserved for tenants earning 60 percent or less of the AMI. Five units are also accessible to persons with physical disabilities.
- Twelve LIHTCs totaling \$1.4 million to construct an affordable multifamily rental complex with all 25 units reserved for tenants earning 50 percent or less of the AMI.

SERVICE TEST

Service Test performance in the Fargo MMA is rated Outstanding. Bank performance in the Fargo AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Fargo AA. The bank has one branch in low-income geographies and one branch in moderate-income geographies. The percentage of branches in both low- and moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Fargo AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 34 qualified service activities involving 11 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 18 of those activities and more than 325 related service hours. Service activities primarily address community service needs, including financial education. During the evaluation period, bank staff provided 16 financial education programs to more than 300 participants, including first-time homebuyers, small businesses, and youth.

Grand Forks, ND–MN Multistate Metropolitan Area (Grand Forks MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on adequate borrower distributions, good geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to an identified community development need for affordable housing.
- Good service performance based on accessible retail delivery systems (with consideration for the bank's limited number of branches in this market, ATM distributions, and ADS usage) and excellent CD service performance, including services that are responsive to an identified community development need for small business technical assistance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Grand Forks MMA

The Grand Forks MMA is the bank's 37th largest rated area based on deposits. It accounts for \$256 million (<1 percent) of bank deposits, three (<1 percent) of bank branches, 13 (<1 percent) of bank ATMs, and 3,298 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Grand Forks AA), which consists of the entire Grand Forks MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Grand Forks MMA

We performed a full-scope review of the Grand Forks AA and rated the Grand Forks MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 57 percent business loans, 38 percent home mortgage loans, and 5 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Grand Forks AA.

LENDING TEST

Lending Test performance in the Grand Forks MMA is rated Outstanding. Bank performance in the Grand Forks AA is excellent based on a good level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Grand Forks AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked third of 21 banks in area deposits as of June 30, 2015, with \$256 million deposits and a 9.9 percent deposit market share.
- During the evaluation period, the bank reported \$234 million home mortgage, business, and farm loans in the AA. It also originated \$5 million in CD loans specific to the AA.
- Of all loans reported in the Grand Forks AA for the year 2015, the bank ranked fourth in the number of home mortgage loans (fifth by dollar volume), first in the number of business loans (fourth by dollar volume), and fifth in the number of farm loans (fourth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 145 home loan reporters. The bank's business lending market share (by number of loans) exceeds its deposit market share. While the bank's farm lending shares are less than its deposit market share, farm loans represent only 5 percent of the bank's lending in this market (by number of loans).

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Grand Forks AA is good as evidenced by an adequate distribution of home mortgage loans, a good distribution of business loans, a poor distribution of farm loans, and no unexplained lending gaps. Our assessment gives the most weight to business and home mortgage loans, as these products respectively account for 57 percent and 38 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Grand Forks AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is adequate.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is somewhat lower than its overall product share.

- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is lower than its overall product share.
 - Market aggregate analysis elevates otherwise very poor performance in low-income tracts to poor performance. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects no home improvement loans in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income geographies is poor. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Grand Forks AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies equals its overall product share.
- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Grand Forks AA is poor. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in the area's sole low-income tract (two farms). Context and market analysis elevate otherwise very poor performance in moderate-income tracts to poor. While the bank reported only three farm loans in moderate-income geographies during the evaluation period, farm lending opportunities are somewhat limited (129 farms). The 2015 market share report reflects a total of 22 farm loans in moderate-income geographies by other reporting lenders, with nearly half of those loans attributable to a national farm equipment finance company.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Grand Forks AA is adequate, as evidenced by a good distribution of home mortgage loans, an adequate distribution of business loans, and a poor distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Grand Forks AA is good based on good home purchase, good home refinance distributions, and adequate home improvement distributions.

- The borrower distribution of home purchase loans is good overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.

- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Grand Forks AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses is near its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Grand Forks AA is poor. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is significantly below the demographic comparator, and the bank's market share of loans to small farms is somewhat lower than its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Grand Forks AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made three CD loans totaling \$4.7 million during the evaluation period. By dollar volume, 98 percent of these loans fund revitalization projects, and the remainder provide affordable housing to LMI persons. CD loans include construction and permanent loans for the expansion of a building facility that will create new jobs in a SBA-designated HUBZone and a state-designated Job Opportunity Building Zone. The dollar volume of CD lending represents 15 percent of allocated Tier 1 Capital for the Grand Forks AA.

INVESTMENT TEST

Investment Test performance in the Grand Forks MMA is rated Outstanding. Bank performance in the Grand Forks AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 21 investments totaling \$5.7 million during the evaluation period, plus another 40 qualifying grants totaling \$56 thousand to at least 16 organizations. The bank also has 12 prior period investments with an aggregate outstanding balance of \$699 thousand. The dollar volume of investments represents 20.6 percent of allocated Tier 1 Capital for the Grand Forks AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$5.1 million or 88.4 percent) serve this need, including:

- Sixteen LIHTCs totaling \$4.0 million to redevelop an affordable multifamily apartment building with 40 units targeted to residents earning 30 to 60 percent of the AML. The project was part of an effort by the city of Grand Forks to replace residential units after a significant portion of the housing stock was lost to flooding.
- A \$500 thousand tax credit to construct an affordable multifamily apartment complex with 37 (of 70) units reserved for families earning 80 percent or less of the AML.

SERVICE TEST

Service Test performance in the Grand Forks MMA is rated High Satisfactory. Bank performance in the Grand Forks AA is good based on accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Grand Forks AA. Our assessment recognizes the bank's limited branch presence in this market and positively considers ATM distributions and ADS usage. The bank has no branches in low-income geographies and one branch in moderate-income geographies. There is only one low-income geography in the AA, in which 5 percent of the population resides. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is expanded by an excellent ATM distribution in moderate-income areas, as well as the availability and demonstrated usage of online banking, mobile banking, interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Grand Forks AA based on the bank's relative level of services provided, demonstrated leadership, and responsiveness to an identified community development need for small business technical assistance. The bank provided 16 qualified service activities involving nine different organizations during the evaluation period. Leadership is evident through Board or committee participation in six of those activities and more than 100 related service hours. Most service activities address financial education needs. Bank staff provided nine financial education programs to nearly 150 participants, including several small business seminars conducted in collaboration with the SBA.

Kansas City, MO–KS Multistate Metropolitan Area (Kansas City MMA)

CRA rating for the MMA: **Outstanding**
The Lending Test is rated: **Outstanding**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **High Satisfactory**

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to identified community development needs for revitalization/job creation and affordable housing.
- Good service performance based on accessible retail delivery systems (with consideration for adjacent MUI branches), branching activity that has improved access, and good CD service performance.

Refer to Tables 1-15 in the Kansas City MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Kansas City MMA

The Kansas City MMA is the bank's 16th largest rated area based on deposits. It accounts for \$3.0 billion (1.1 percent) of bank deposits, 59 (2 percent) of bank branches, 75 (2 percent) of bank ATMs, and 35,454 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Kansas City AA), which includes nine (of 14) counties in the Kansas City MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Kansas City MMA

We performed a full-scope review of the Kansas City AA and rated the Kansas City MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 53 percent home mortgage loans, 46 percent business loans, and 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Kansas City AA.

LENDING TEST

Lending Test performance in the Kansas City MMA is rated Outstanding. Bank performance in the Kansas City AA is excellent based on an excellent level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Kansas City AA reflect excellent responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fourth of 123 banks in area deposits as of June 30, 2015, with \$3.0 billion deposits and a 6.4 percent deposit market share.
- During the evaluation period, the bank reported \$3.8 billion home mortgage, business, and farm loans in the AA. It also originated \$94 million in CD loans specific to the AA.
- Of all loans reported in the Kansas City AA for the year 2015, the bank ranked second in the number of home mortgage loans (third by dollar volume), second in the number of business loans (third by dollar volume), and third in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 615 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Kansas City AA is good, as evidenced by an adequate distribution of home mortgage loans, an excellent distribution of business loans, a good distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Kansas City AA is adequate based on good home purchase, adequate home improvement, and adequate home refinance distributions.

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase loans.
 - The geographic distribution of home purchase loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.

- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is near its overall product share.
- The geographic distribution of home purchase loans in the 2014-2015 period is adequate overall.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income geographies is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported home improvement loans.
 - The geographic distribution of home improvement loans in the 2014-2015 period is adequate overall.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is near its overall product share.
 - The geographic distribution of home improvement loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate overall.
 - The geographic distribution of home refinance loans in the 2012-2013 period is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.

- Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
- Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
- Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is somewhat lower than its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Kansas City AA is excellent. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported business loans.

- The geographic distribution of reported business loans in the 2012-2013 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share.
- The geographic distribution of reported business loans in the 2014-2015 period is good overall.
- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Kansas City AA is good.

- The geographic distribution of reported farm loans in the 2012-2013 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.
 - Context and market analysis elevate otherwise poor performance in low-income tracts to adequate. While the bank reported only one farm loan in low-income geographies during this period, farm lending opportunities are somewhat limited (126 farms). The 2013 market share report reflects a total of four farm loans in low-income geographies by other reporting lenders.
- The geographic distribution of reported farm loans in the 2014-2015 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank did not report any farm loans in low-income geographies during this period, farm lending opportunities are somewhat limited (115 farms). The 2015 market share report reflects a total of only two farm loans in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Kansas City AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Kansas City AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good.
 - The borrower distribution of home purchase loans in the 2012-2013 period is good.

- Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers is near its overall product share.
- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home purchase loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good.
 - The borrower distribution of home refinance loans in the 2012-2013 period is good overall.

- Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
- Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Kansas City AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Kansas City AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Kansas City AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 34 CD loans totaling \$94.2 million during the evaluation period. By dollar volume, 59 percent of these loans provide affordable housing to LMI persons (676 units created or rehabilitated), 33 percent fund revitalization projects, 6 percent support community services for LMI persons, and the remainder promote economic development. CD loans include a term loan for a new market tax credit project to build a new manufacturing facility in a low-income geography that is also a SBA-designated HUBZone. The project retains 400 existing jobs and creates 150 new jobs. The dollar volume of CD lending represents 51 percent of allocated Tier 1 Capital for the Kansas City AA.

INVESTMENT TEST

Investment Test performance in the Kansas City MMA is rated Outstanding. Bank performance in the Kansas City AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 260 investments totaling \$113.7 million during the evaluation period, plus another 156 qualifying grants and donations totaling \$1.1 million to at least 46 organizations. At year-end 2015, the bank also has 39 prior period investments with an aggregate outstanding balance of \$28.2 million and four unfunded commitments totaling \$3.7 million. The dollar volume of investments (excluding unfunded commitments) represents 39.0 percent of allocated Tier 1 Capital for the Kansas City AA.

Investments are particularly responsive to identified community development needs for revitalization/job creation and affordable housing. Almost all current period investments (\$113.8 million or 99.1 percent) serve these needs, including:

- NMTC investments totaling \$11.4 million to support a business expansion project located in a low-income area and SBA-designated HUBZone. The project will relocate 400 existing jobs and create 150 new jobs.
- Forty-six LIHTCs and an HTC totaling \$21.9 million to construct a housing complex targeting homeless veterans. All 59 units are affordable to veterans earning 60 percent or less of the AMI. The complex also houses a nonprofit organization that provides supportive services for tenants.
- Forty-one LIHTCs totaling \$13.5 million to construct a 50-unit affordable apartment building serving LMI families.

SERVICE TEST

Service Test performance in the Kansas City MMA is rated High Satisfactory. Bank performance in the Kansas City AA is good based on accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Kansas City AA, with consideration for MUI branches in close proximity to LMI geographies. The bank has four branches in low-income geographies and nine branches in moderate-income geographies. The percentage of branches in low-income tracts is near, and the percentage of branches in moderate-income tracts is somewhat lower than, the percentage of the population respectively residing in each area. However, there are seven MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is further supported by overall good ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Branching activity has improved access to banking services. The bank opened three branches and closed one branch during the evaluation period. There was one net branch opening in both moderate- and middle-income tracts. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Kansas City AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 188 qualified service activities involving 50 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 83 of those activities with nearly 2,000 related service hours. Most service activities address community service needs, including financial education. Bank staff provided 104 financial education programs to nearly 2,500 participants, including first-time homebuyers, small businesses, and youth. The bank also maintains an Individual Development Account program relationship with a local nonprofit organization.

Lewiston, ID-WA Multistate Metropolitan Area (Lewiston MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, excellent geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which further supports excellent lending performance.
- Excellent investment performance based on investment activity and responsiveness to economic development/small business financing needs.
- Excellent service performance based on readily accessible retail delivery systems and adequate CD service performance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Lewiston MMA

The Lewiston MMA is the bank's 38th largest rated area based on deposits. It accounts for \$125 million (<1 percent) of bank deposits, three (<1 percent) of bank branches, six (<1 percent) of bank ATMs, and 2,019 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Lewiston AA), which consists of the entire Lewiston MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Lewiston MMA

We performed a full-scope review of the Lewiston AA and rated the Lewiston MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 54 percent business loans, 42 percent home mortgage loans, and 4 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Lewiston AA.

LENDING TEST

Lending Test performance in the Lewiston MMA is rated Outstanding. Bank performance in the Lewiston AA is excellent based on an excellent level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which further supports excellent lending performance.

Lending Activity

Lending levels in the Lewiston AA reflect excellent responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked seventh of 12 banks in area deposits as of June 30, 2015, with \$125 million deposits and a 15.2 percent deposit market share.
- During the evaluation period, the bank reported \$171 million home mortgage, business, and farm loans in the AA. It also originated \$2 million in CD loans specific to the AA.
- Of all loans reported in the Lewiston AA for the year 2015, the bank ranked sixth in the number and dollar volume of home mortgage loans, first in the number of business loans (fourth by dollar volume), and first in the number of farm loans (third by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 125 home loan reporters. The bank's lending market shares for other products generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Lewiston AA is excellent, as evidenced by a good distribution of home mortgage loans, an excellent distribution of business loans, an adequate distribution of farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Lewiston AA is good based on excellent home purchase, good home improvement, and adequate home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans is adequate. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is lower than its overall product share.

Small Loans to Businesses

The geographic distribution of reported business loans in the Lewiston AA is excellent. The percentage of bank loans in moderate-income geographies equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The geographic distribution of reported farm loans in the Lewiston AA is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is near its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Lewiston AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Lewiston AA is good based on good home refinance, adequate home purchase, and adequate home improvement distributions. Our assessment gives the most weight to home refinance loans as they account for 68 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is significantly below its overall product share.
- The borrower distribution of home improvement loans is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers equals its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Lewiston AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Lewiston AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Lewiston AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities, with consideration of the more limited opportunities for CD lending in this market. The bank made five CD loans totaling \$1.8 million during the evaluation period. By dollar volume, 52 percent of these loans fund revitalization projects, and 48 percent provide affordable housing to LMI persons. CD loans include a participation loan with a consortium of lenders for the development of a housing complex that provides 47 affordable units to tenants earning 30 to 55 percent of the area median income. The dollar volume of CD lending represents 12 percent of allocated Tier 1 Capital.

Regional CD lending has a neutral impact on performance. The bank made two CD loans totaling \$12.3 million in the Pacific Division, which includes the states of Alaska, California, Hawaii, Oregon, and Washington. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Lewiston AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of California, Oregon, and Washington, as well as the multistate metropolitan areas of Lewiston and Portland.

INVESTMENT TEST

Investment Test performance in the Lewiston MMA is rated Outstanding. Bank performance in the Lewiston AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made nine investments totaling \$1.7 million during the evaluation period, plus another 16 qualifying grants totaling \$35 thousand to nine organizations. The bank also has ten prior period investments with an aggregate outstanding balance of \$2.3 million. The dollar volume of investments represents 26.2 percent of allocated Tier 1 Capital for the Lewiston AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$1.5 million or 85.9 percent) have this community development purpose, including six bonds totaling \$1.5 million that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Lewiston MMA.

SERVICE TEST

Service Test performance in the Lewiston MMA is rated Outstanding. Bank performance in the Lewiston AA is excellent based on readily accessible retail delivery systems and adequate CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Lewiston AA. Although the bank has a limited branch presence in this market, two (of its three) branches are in moderate-income geographies. There are no low-income geographies in the AA. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is adequate in the Lewiston AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided six qualified service activities involving five different organizations during the evaluation period. Leadership is evident through Board or committee participation in four of those activities and nearly 50 related service hours. Service activities address community service, affordable housing, and economic development needs.

Logan, UT-ID Multistate Metropolitan Area (Logan MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to economic development/small business financing needs.
- Good service performance based on readily accessible retail delivery systems (with emphasis on moderate-income areas) and the absence of CD service activities.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Logan MMA

The Logan MMA is the bank's 39th largest rated area based on deposits. It accounts for \$37 million (<1 percent) of bank deposits, two (<1 percent) of bank branches, two (<1 percent) of bank ATMs, and 2,194 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Logan AA), which consists of the entire Logan MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Logan MMA

We performed a full-scope review of the Logan AA and rated the Logan MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 78 percent home mortgage loans, 20 percent business loans, and 2 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Logan AA.

LENDING TEST

Lending Test performance in the Logan MMA is rated Outstanding. Bank performance in the Logan AA is excellent based on an excellent level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Logan AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked seventh of 10 banks in area deposits as of June 30, 2015, with \$37 million deposits and a 2.5 percent deposit market share.
- During the evaluation period, the bank reported \$321 million home mortgage, business, and farm loans in the AA. It also originated \$1 million in CD loans specific to the AA.
- Of all loans reported in the Logan AA for the year 2015, the bank ranked third in the number of home mortgage loans (first by dollar volume), sixth in the number of business loans (fourth by dollar volume), and fifth in the number of farm loans (third by dollar volume). The bank's lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Logan AA is good, as evidenced by good distributions of home mortgage and business loans, an adequate distribution of farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Logan AA is good based on excellent home purchase, excellent home improvement, and adequate home refinance distributions. Our assessment is primarily based on performance in moderate-income geographies as there is limited opportunity for home mortgage lending in low-income geographies (no owner-occupied units and 520 rental units).

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share. The bank reported two home purchase loans in low-income geographies during the evaluation period. The 2015 market share report reflects no home purchase loans in low-income geographies by other lenders.
- The geographic distribution of home improvement loans is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects no home improvement loans in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall product share. The bank reported no home refinance loans in low-income geographies during the evaluation period. The 2015 market share report reflects no home refinance loans in low-income geographies by other lenders.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Logan AA is good.

- Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank reported only two business loans in low-income geographies during the evaluation period, business lending opportunities are somewhat limited (100 businesses). The 2015 market share report reflects a total of only one business loan in low-income geographies by other reporting lenders.
- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Logan AA is adequate. Our assessment is based on performance in moderate-income geographies as there is no lending opportunity in low-income geographies. Context and market analysis elevate otherwise very poor performance in moderate-income tracts to adequate. While the bank did not report any farm loans in moderate-income geographies during the evaluation period, farm lending opportunities are limited (54 farms). The 2015 market share reports reflect a total of only two farm loans in moderate-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Logan AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Logan AA is good based on good home refinance, good home improvement, and adequate home purchase distributions.

- The borrower distribution of home purchase loans is adequate overall.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is significantly below its overall product share.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
- The borrower distribution of home improvement loans is good overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.

- Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
- The borrower distribution of home refinance loans is good.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Logan AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Logan AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is near the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Logan AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made two CD loans totaling \$1.2 million during the evaluation period. By dollar volume, 99 percent of these loans support community services for LMI persons, and the remainder provide affordable housing to LMI persons. CD loans include a loan to acquire property in a moderate-income geography that will be leased to a federally-funded organization whose mission is to promote school readiness for children from low-income families. The dollar volume of CD lending represents 28 percent of allocated Tier 1 Capital for the Lewiston AA.

INVESTMENT TEST

Investment Test performance in the Logan MMA is rated Outstanding. Bank performance in the Logan AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made five investments totaling \$436 thousand during the evaluation period. The bank also has six prior period investments with an aggregate outstanding balance of \$345 thousand. The dollar volume of investments represents 17.5 percent of allocated Tier 1 Capital for the Logan AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$334 thousand or 76.7 percent) have this community development purpose and consist of four bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Logan MMA.

SERVICE TEST

Service Test performance in the Logan MMA is rated High Satisfactory. Bank performance in the Logan AA is good based on readily accessible retail delivery systems and the absence of CD service activities.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Logan AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of the area's sole low-income geography. The bank has no branches in low-income geographies and one branch in moderate-income geographies. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas, as well as the availability and demonstrated usage of online banking, mobile banking, interactive voice response, and ATMs by customers residing in low-and/or moderate-income areas.

There was no branching activity in this AA during the evaluation period. Branch hours and services are tailored to the convenience and needs of the AA. The moderate-tract branch has more weekday hours and is also open Saturday.

Community Development Services

The bank did not provide any qualified CD service activities in the Logan AA during the evaluation period.

Louisville/Jefferson County, KY-IN Multistate Metropolitan Area (Louisville MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, adequate geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to an identified community development need for revitalization/job creation.
- Excellent service performance based on readily accessible retail delivery systems (with consideration for ATM distributions and ADS usage) and good CD service performance.

Refer to Tables 1-15 in the Louisville MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Louisville MMA

The Louisville MMA is the bank's 30th largest rated area based on deposits. It accounts for \$789 million (<1 percent) of bank deposits, 27 (1 percent) of bank branches, 32 (1 percent) of bank ATMs, and 8,713 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Louisville AA), which includes five (of 12) counties in the Louisville MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Louisville MMA

We performed a full-scope review of the Louisville AA and rated the Louisville MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 52 percent home mortgage loans and 48 percent business loans. The bank has an insufficient number of reported farm loans in this market for meaningful analysis. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Louisville AA.

LENDING TEST

Lending Test performance in the Louisville MMA is rated Outstanding. Bank performance in the Louisville AA is excellent based on a good level of lending activity, adequate overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Louisville AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked seventh of 32 banks in area deposits as of June 30, 2015, with \$789 million deposits and a 3.6 percent deposit market share.
- During the evaluation period, the bank reported \$764 million home mortgage, business, and farm loans in the AA. It also originated \$97 million in CD loans specific to the AA.
- Of all loans reported in the Louisville AA for the year 2015, the bank ranked ninth in the number of home mortgage loans (tenth by dollar volume) and fourth in the number of business loans (ninth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 395 home loan reporters. The bank's business lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Louisville AA is adequate, as evidenced by an adequate distribution of home mortgage loans, a good distribution of business loans, and no unexplained lending gaps. Our assessment weights home mortgage loans more than business loans as they account for a larger share of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Louisville AA is adequate based on adequate home refinance, good home purchase, and good home improvement distributions. Our assessment gives the most weight to home refinance loans as they account for 54 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.

- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. The bank's market share of home purchase loans in low-income geographies exceeds its overall product share for the 2012-2013 period, and is somewhat lower than its overall product share for the 2014-2015 period.
- The geographic distribution of home improvement loans is good overall.
 - The geographic distribution of home improvement loans in the 2012-2013 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in low-income geographies equals its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans is adequate.
 - The geographic distribution of home refinance loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.
 - The geographic distribution of home refinance loans in the 2014-2015 period is adequate overall.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.

- Market aggregate analysis elevates otherwise very poor performance in low-income tracts to poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is lower than its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Louisville AA is good.

- The geographic distribution of reported business loans in the 2012-2013 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of reported business loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is somewhat lower than its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Louisville AA is good, as evidenced by good distributions of home mortgage and business loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Louisville AA is good based on good home refinance, good home improvement, and excellent home purchase distributions.

- The borrower distribution of home purchase loans is excellent.

- The borrower distribution of home purchase loans in the 2012-2013 period is excellent. The percentage of bank loans to both low- and moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to both low- and moderate-income borrowers exceeds (or is near) its overall product share.
- The borrower distribution of home purchase loans in the 2014-2015 period is excellent overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is excellent. The percentage of bank loans to low-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is good.
 - The borrower distribution of home refinance loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Louisville AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than (or near) the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Louisville AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made nine CD loans totaling \$97.1 million during the evaluation period. By dollar volume, 99 percent of these loans fund revitalization projects, and the remainder support community services and affordable housing for LMI persons. CD loans include a construction loan to build a shopping center in a moderate-income geography that creates approximately 1,000 jobs. The dollar volume of CD lending represents 202 percent of allocated Tier 1 Capital for the Louisville AA.

Regional CD lending has a neutral impact on performance. The bank made one CD loan totaling \$6.6 million in the East South Central Division, which includes the states of Alabama, Kentucky, Mississippi, and Tennessee. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Louisville AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of Kentucky and Tennessee, as well as the multistate metropolitan areas of Cincinnati, Clarksville, and Louisville.

INVESTMENT TEST

Investment Test performance in the Louisville MMA is rated Outstanding. Bank performance in the Louisville AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 45 investments totaling \$19.5 million during the evaluation period, plus another 69 qualifying grants and donations totaling \$444 thousand to at least 24 organizations. At year-end 2015, the bank also has 20 prior period investments with an aggregate outstanding balance of \$7.8 million and two unfunded commitments totaling \$10.3 million. The dollar volume of investments (excluding unfunded commitments) represents 28.8 percent of allocated Tier 1 Capital for the Louisville AA.

Investments are particularly responsive to an identified community development need for revitalization/job creation. Most current period investments (\$12.4 million or 62.5 percent) serve this need, including 11 NMTCs and an HTC totaling \$9.9 million to redevelop an historic building into a mixed purpose complex with a hotel, office space, and several restaurants and retailers. The project is expected to create 255 new full-time jobs.

SERVICE TEST

Service Test performance in the Louisville MMA is rated Outstanding. Bank performance in the Louisville AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Louisville AA, with positive consideration for ATM distributions and ADS usage. The bank has four branches in low-income geographies and four branches in moderate-income geographies. The percentage of branches in low-income tracts exceeds, and the percentage of branches in moderate-income tracts meets (or is near), the percentage of the population respectively residing in each area. Access is expanded by excellent ATM distributions in both low- and moderate-income areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Branching activity has not adversely affected access to banking services. The bank closed one branch in an upper-income tract during the evaluation period. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average more than 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and a majority are open Sunday as well.

Community Development Services

CD service performance is good in the Louisville AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 93 qualified service activities involving 36 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 26 of those activities and more than 300 related service hours. Many service activities address financial education needs. Bank staff provided 67 financial education programs to more than 1,700 participants.

Minneapolis–St. Paul–Bloomington, MN–WI Multistate Metropolitan Area (Minneapolis MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on adequate borrower distributions, excellent geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity (with consideration for the bank's large volume of centralized, non-local deposits in this market) and responsiveness to identified community development needs for economic development/small business financing and affordable housing.
- Excellent service performance based on readily accessible retail delivery systems and excellent CD service performance.

Refer to Tables 1-15 in the Minneapolis MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Minneapolis MMA

The Minneapolis MMA is the bank's largest rated area based on deposits. It accounts for \$59.9 billion (21.4 percent) of bank deposits, 99 (3 percent) of bank branches, 441 (9 percent) of bank ATMs, and 150,892 (9 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Minneapolis AA), which includes 13 (of 16) counties in the Minneapolis MSA as of year-end 2015. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Minneapolis MMA

We performed a full-scope review of the Minneapolis AA and rated the Minneapolis MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 51 percent business loans, 49 percent home mortgage loans, and less than 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Minneapolis AA.

LENDING TEST

Lending Test performance in the Minneapolis MMA is rated Outstanding. Bank performance in the Minneapolis AA is excellent based on a good level of lending activity, excellent overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Minneapolis AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment. Our assessment also considers the large volume of centralized nonlocal deposits the bank attributes to this market.

- USB ranked second of 143 banks in area deposits as of June 30, 2015, with \$59.9 billion deposits and a 35.3 percent deposit market share. The bank would still have a second-place deposit rank excluding the large volume of centralized nonlocal deposits (\$26.5 billion), but its deposit market share would be 23 percent.
- During the evaluation period, the bank reported \$16.1 billion home mortgage, business, and farm loans in the AA. It also originated \$587 million in CD loans specific to the AA.
- Of all loans reported in the Minneapolis AA for the year 2015, the bank ranked second in the number and dollar volume of home mortgage loans, first in the number of business loans (second by dollar volume), and first in the number of farm loans (seventh by dollar volume). Lending market shares are less than the bank's deposit market share due to the large volume of centralized nonlocal deposits attributed to this market. Additionally, this is a competitive market for home mortgage lending (more than 700 reporters) and business/farm lending (at least 120 reporters).

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Minneapolis AA is excellent, as evidenced by a good distributions of home mortgage, multifamily, and farm loans, an excellent distribution of business loans, and no unexplained lending gaps. Our assessment gives the most weight to business loans as they account for 51 percent of bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Minneapolis AA is good based on excellent home purchase, adequate home refinance, and adequate home improvement distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate.
 - The geographic distribution of home improvement loans in the 2012-2013 period is adequate overall.

- Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans in the 2014-2015 period is adequate. The percentage of bank loans in both low- and moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in both low- and moderate-income geographies is near its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home refinance loans.
 - The geographic distribution of home refinance loans in the 2012-2013 period is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.
 - The geographic distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Minneapolis AA is good.

- The geographic distribution of multifamily loans in the 2012-2014 period is good overall.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator.
- The geographic distribution of multifamily loans in the 2014-2015 period is good overall.

- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator.
- Performance in moderate-income geographies is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Minneapolis AA is excellent. While the 2014-2015 period had more loan production, additional market analysis elevates otherwise good performance to excellent. Market share reports reflect that of all reporting lenders, the bank reported the most business loans in both low- and moderate-income geographies during the evaluation period.

- The geographic distribution of reported business loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.
- The geographic distribution of reported business loans in the 2012-2013 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Minneapolis AA is good.

- The geographic distribution of reported farm loans in the 2012-2013 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

- Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank reported no farms loan in low-income geographies during this period, farm lending opportunities are limited (98 farms). The 2013 market share report reflects a total of only three farm loans in low-income geographies by other reporting lenders.
- The geographic distribution of reported farm loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies is exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Minneapolis AA is adequate, as evidenced by a good distribution of home mortgage loans, and adequate distributions of business and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Minneapolis AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good.
 - The borrower distribution of home purchase loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
 - The borrower distribution of home purchase loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good.
 - The borrower distribution of home refinance loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.
 - The borrower distribution of home refinance loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Minneapolis AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses is near its overall product share.

Small Loans to Farms

The overall distribution of reported loans to farm of different sizes in the Minneapolis AA is adequate. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported farm loans.

- The distribution of reported loans to farms of different sizes in the 2014-2015 period is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.
- The distribution of reported loans to farms of different sizes in the 2012-2013 period is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Minneapolis AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities, with consideration of the bank's large volume of centralized nonlocal deposits in this market (described in the Lending Activity section). The bank made 95 CD loans totaling \$586.8 million during the evaluation period. By dollar volume, 49 percent of these loans provide affordable housing to LMI persons (1,286 units created or rehabilitated), 40 percent fund revitalization projects, 10 percent support community services for LMI persons, and the remainder promote economic development. The dollar volume of CD lending represents 16 percent of allocated Tier 1 Capital for the Minneapolis AA.

CD loans include:

- A construction loan for a LIHTC project to convert a commercial building into a 251-unit affordable housing complex, with 200 units allocated to tenants earning 60 percent or less of the area median income.
- A construction loan for a LIHTC project to build an affordable housing complex, with all 167 units allocated to tenants earning 60 percent or less of the area median income.
- A loan to construct the international headquarters for a nonprofit organization. The project will create 900 jobs in a SBA-designated HUBZone and Minneapolis Empowerment zone.

INVESTMENT TEST

Investment Test performance in the Minneapolis MMA is rated Outstanding. Bank performance in the Minneapolis AA is excellent in relation to bank capacity, identified needs, and available investment opportunities. Our assessment also considers the bank's large volume of centralized, non-local deposits in this market (as described in the Lending Activity and Market Profile sections).

USB demonstrated an excellent level of investment activity. The bank made 505 investments totaling \$456.9 million during the evaluation period, plus another 354 qualifying grants and donations totaling \$8.1 million to at least 65 organizations. At year-end 2015, the bank also has 122 prior period investments with an aggregate outstanding balance of \$80.2 million and five unfunded commitments totaling \$4.8 million. The dollar volume of investments (excluding unfunded commitments) represents 7.5 percent of allocated Tier 1 Capital for the Minneapolis AA.

Investments are particularly responsive to identified community development needs for economic development/small business financing and affordable housing. Most current period investments (\$397.9 million or 85.6 percent) serve these needs, including:

- A \$75 million bond that provides funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Minneapolis AA.
- Two LIHTCs totaling \$14.4 million to construct a mixed-use residential and retail complex with 107 (of 108) affordable housing units for tenants earning 30 to 60 percent of the AMI, including 14 units targeted to long-term homeless persons.
- A \$10.7 million LIHTC to redevelop an historic building into an affordable multi-family apartment building. All 60 units are affordable to tenants earning 60 percent or less of the AMI, including seven units targeted to long-term homeless persons.

SERVICE TEST

Service Test performance in the Minneapolis MMA is rated Outstanding. Bank performance in the Minneapolis AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Minneapolis AA. The bank has six branches in low-income geographies and 24 branches in moderate-income geographies. The percentage of branches in low- and moderate-income tracts generally exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

Branching activity has not adversely affected access to banking services. The bank opened seven branches and closed three branches during the evaluation period, with one net closure in moderate-income geographies and five net openings in middle-income geographies.

Despite the moderate-tract branch closure, the bank maintains excellent branch distributions in LMI areas. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average approximately 50 hours per week for both LMI and MUI branches. A significant majority of branches are traditional branches, and most are open Saturday.

Community Development Services

CD service performance is excellent in the Minneapolis AA based on the bank's high level of services provided and strong leadership. The bank provided 570 qualified service activities involving 128 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 223 of those activities with 5,800 related service hours.

Service activities address a variety of CD initiatives, including financial education. Service activity examples during the evaluation period include:

- A bank employee provided more than 120 service hours as a two-year Chair and two-year Treasurer of a board for an affordable housing organization.
- A bank employee provided more than 160 service hours as a three-year Board Chair for an organization that help entrepreneurs develop successful businesses in low-income communities.
- Bank staff provided 345 financial education programs to more than 8,000 participants, including small businesses, first-time homebuyers, and youth.

Omaha-Council Bluffs, NE-IA Multistate Metropolitan Area (Omaha MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, good geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to an identified community development need for affordable rental housing.
- Excellent service performance based on readily accessible retail delivery systems (with consideration for ATM distributions and ADS usage), branching activity that has improved LMI access, and good CD service performance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Omaha MMA

The Omaha MMA is the bank's 17th largest rated area based on deposits. It accounts for \$2.6 billion (1 percent) of bank deposits, 34 (1 percent) of bank branches, 52 (1 percent) of bank ATMs, and 22,400 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Omaha AA), which includes five (of eight) counties in the Omaha MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Omaha MMA

We performed a full-scope review of the Omaha AA and rated the Omaha MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 62 percent home mortgage loans, 36 percent business loans, and 2 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Omaha AA.

LENDING TEST

Lending Test performance in the Omaha MMA is rated Outstanding. Bank performance in the Omaha AA is excellent based on a good level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Omaha AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fourth of 54 banks in area deposits as of June 30, 2015, with \$2.6 billion deposits and a 9.4 percent deposit market share.
- During the evaluation period, the bank reported \$2.2 billion home mortgage, business, and farm loans in the AA. It also originated \$83 million in CD loans specific to the AA.
- Of all loans reported in the Omaha AA for the year 2015, the bank ranked third in the number and dollar volume of home mortgage loans, second in the number of business loans (fifth by dollar volume), and second in the number of farm loans (third by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 355 home loan reporters. The bank's lending market shares for other products generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Omaha AA is good, as evidenced by good distributions of home mortgage and farm loans, an excellent distribution of business loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Omaha AA is good based on excellent home purchase, good home improvement, and good home refinance distributions.

- The geographic distribution of home purchase loans is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income geographies is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.

- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Omaha AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in both low- and moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Omaha AA is good. Our assessment is primarily based on performance in moderate-income geographies as there is limited opportunity for farm lending in low-income geographies.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank reported no farms loan in low-income geographies during the evaluation period, farm lending opportunities are limited (49 farms). The 2015 market share report reflects a total of only five farm loans in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Omaha AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Omaha AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Omaha AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Omaha AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Omaha AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made 14 CD loans totaling \$82.7 million during the evaluation period. By dollar volume, 77 percent of these loans fund revitalization projects, 16 percent provide affordable housing to LMI persons, and 7 percent support community services for LMI persons. CD loans include a construction-to-permanent loan for the development of a medical office building in a moderate-income geography and SBA-designated HUBZone. The project replaces two obsolete office buildings and create 250 new jobs. The dollar volume of CD lending represents 26 percent of allocated Tier 1 Capital for the Omaha AA.

INVESTMENT TEST

Investment Test performance in the Omaha MMA is rated Outstanding. Bank performance in the Omaha AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 261 investments totaling \$48.4 million during the evaluation period, plus another 67 qualifying grants totaling \$428 thousand to at least 30 organizations. The bank also has 35 prior period investments with an aggregate outstanding balance of \$6.8 million and one unfunded commitment totaling \$488 thousand. The dollar volume of investments (excluding unfunded commitments) represents 17.2 percent of allocated Tier 1 Capital for the Omaha AA.

Investments are particularly responsive to an identified community development need for affordable rental housing. Most current period investments (\$25.1 million or 51.4 percent) serve this need, including:

- Twenty-eight LIHTCs totaling \$9.5 million to rehabilitate a former hospital building into affordable housing targeted to homeless veterans. All 80 units are affordable to tenants earning 60 percent or less of the AMI.
- A \$4.4 million LIHTC to support an affordable housing community with 60 units targeted to low-income seniors.

SERVICE TEST

Service Test performance in the Omaha MMA is rated Outstanding. Bank performance in the Omaha AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Omaha AA, with positive consideration for ATM distributions and ADS usage. The bank has two branches in low-income geographies and nine branches in moderate-income geographies. The percentage of branches in low-income tracts is somewhat lower than, and in moderate-income tracts exceeds, the percentage of the population respectively residing in each area. Access is expanded by excellent ATM distributions in both low- and moderate-income areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

Branching activity has improved LMI access to banking services. The bank opened one branch in a moderate-income tract and closed one branch in a middle-income tract during the evaluation period. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average approximately 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and one-third are open Sunday. In addition, a larger share of the branches in LMI areas have drive-up facilities.

Community Development Services

CD service performance is good in the Omaha AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 115 qualified service activities involving 30 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 42 of those activities with more than 600 related service hours. Most service activities address financial education needs. Bank staff provided 73 financial education programs to more than 1,200 participants, including small businesses, senior citizens, and youth.

Portland-Vancouver-Hillsboro, OR-WA Multistate Metropolitan Area (Portland MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, excellent geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to an identified community development need for affordable housing.
- Excellent service performance based on readily accessible retail delivery systems and excellent CD service performance.

Refer to Tables 1-15 in the Other MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Portland MMA

The Portland MMA is the bank's 9th largest rated area based on deposits. It accounts for \$9.8 billion (3.5 percent) of bank deposits, 105 (3 percent) of bank branches, 222 (5 percent) of bank ATMs, and 63,350 (4 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (Portland AA), which includes six (of seven) counties in the Portland MSA. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the Portland MMA

We performed a full-scope review of the Portland AA and rated the Portland MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 66 percent business loans, 33 percent home mortgage loans, and 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Portland AA.

LENDING TEST

Lending Test performance in the Portland MMA is rated Outstanding. Bank performance in the Portland AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Portland AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked first of 36 banks in area deposits as of June 30, 2015, with \$9.8 billion deposits and a 22.9 percent deposit market share.
- During the evaluation period, the bank reported \$5.7 billion home mortgage, business, and farm loans in the AA. It also originated \$300 million in CD loans specific to the AA.
- Of all loans reported in the Portland AA for the year 2015, the bank ranked third in the number and dollar volume of home mortgage loans, second in the number and dollar volume of business loans, and first in the number of farm loans (third by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 540 home loan reporters. The bank's lending market shares for other products (by number of loans) exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Portland AA is excellent, as evidenced by a good distribution of home mortgage loans, excellent distributions of multifamily and business loans, an adequate distribution of farm loans, and no unexplained lending gaps. Our assessment gives the most weight to business and home mortgage loans, as these products respectively account for 66 percent and 33 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Portland AA is good based on good home refinance, good home improvement, and excellent home purchase distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies equals or exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.

- The geographic distribution of home refinance loans is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Portland AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Portland AA is excellent. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is excellent. The percentage of bank in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies equals its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies equals its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Portland AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of farm loans in low-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Portland AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Portland AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home improvement loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Portland AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Portland AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Portland AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made 75 CD loans totaling \$300.5 million during the evaluation period. By dollar volume, 57 percent of these loans fund revitalization projects, 31 percent provide affordable housing to LMI persons (2,085 units created or rehabilitated), 9 percent support community services for LMI persons, and 3 percent promote economic development. The dollar volume of CD lending represents 25 percent of allocated Tier 1 Capital for the Portland AA.

CD loans include:

- A construction loan to develop a mixed-use facility with multifamily housing and retail space. The project will create 100 jobs and is located in a moderate-income geography, the Portland Central Eastside Urban Renewal zone, and a SBA-designated HUBZone.
- A loan for a LIHTC project to develop a mixed-income, multifamily apartment complex. A majority of the units (278 of 396 units) are allocated to tenants earning 60 percent or less of the area median income.

Regional CD lending has a neutral impact on performance. The bank made two CD loans totaling \$12.3 million in the Pacific Division, which includes the states of Alaska, California, Hawaii, Oregon, and Washington. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Portland AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of California, Oregon, and Washington, as well as the multistate metropolitan areas of Lewiston and Portland.

INVESTMENT TEST

Investment Test performance in the Portland MMA is rated Outstanding. Bank performance in the Portland AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 266 investments totaling \$152.9 million during the evaluation period, plus another 371 qualifying grants totaling \$2.8 million to at least 151 organizations. The bank also has 59 prior period investments with an aggregate outstanding balance of \$28.7 million and one unfunded commitment totaling \$161 thousand. The dollar volume of investments (excluding unfunded commitments) represents 15.4 percent of allocated Tier 1 Capital for the Portland AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$101.6 million or 65.3 percent) serve this need, including:

- A \$22.1 million LIHTC to construct a multifamily affordable housing complex with all 236 units affordable to tenants earning 60 percent or less of the AMI.
- A \$9.4 million LIHTC to construct an affordable housing project targeting families experiencing (or at risk of) homelessness, families with parents in recovery from drug/alcohol addiction, survivors of domestic violence, and families working towards reunification and regaining custody of children from protective services and foster care. All 60 units are targeted to tenants earning 30 to 60 percent of the AMI.
- Twelve LIHTCs totaling \$7.3 million to construct a low-income apartment building with space for a nonprofit organization that provides social services to impoverished persons. All 42 studio units are affordable to tenants earning 60 percent or less of the AMI.

Because the bank was responsive to community development needs and opportunities in the Portland AA, broader regional investments that provide only indirect benefit are considered and have a neutral impact on performance. The bank has 54 regional investments (current and prior period) totaling \$56.1 million, and three unfunded commitments totaling \$68 thousand, in the broader Pacific Division, which includes the states of California, Oregon, and Washington. The dollar volume of these regional investments (excluding unfunded commitments) represents less than 1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Portland MMA.

SERVICE TEST

Service Test performance in the Portland MMA is rated Outstanding. Bank performance in the Portland AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Portland AA. The bank has five branches in low-income geographies and 31 branches in moderate-income geographies. The percentage of branches in both low- and moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

Discretionary branching activity has not adversely affected access to banking services. The bank closed six branches and opened six branches during the evaluation period. There were net closures in moderate-income tracts (four branches), with net openings in middle-income tracts (three branches) and upper-income tracts (one branch). Two moderate-tract branch closures result from grocery store closures that were not within bank control. Despite the branch closures, the bank maintains excellent branch distributions in LMI areas. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Portland AA based on the bank's high level of services provided and strong leadership. The bank provided 352 qualified service activities involving 91 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 148 of those activities with nearly 4,000 service hours.

Service activities address a variety of CD initiatives, including financial education. Service activity examples during the evaluation period include:

- A bank employee provided more than 300 service hours as a four-year board member (including two years as a committee chair) of an organization that helps individuals move from homelessness and poverty to lives of self-sufficiency and independence.
- A bank employee provided more than 300 service hours as a four-year Board Chair for an organization that provides loan underwriting and specialized asset management of affordable housing for LMI families.
- Bank staff provided 202 financial education programs to approximately 4,800 participants.

St. Louis, MO-IL Multistate Metropolitan Area (St. Louis MMA)

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

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, good geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.
- Excellent investment performance based on investment activity and responsiveness to identified community development needs for revitalization/job creation and affordable housing.
- Excellent service performance based on readily accessible retail delivery systems (with consideration for adjacent MUI branches) and excellent CD service performance, including services that are responsive to identified community development needs for financial education.

Refer to Tables 1-15 in the St. Louis MMA section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the St. Louis MMA

The St. Louis MMA is the bank's 5th largest rated area based on deposits. It accounts for \$13.9 billion (5.0 percent) of bank deposits, 117 (4 percent) of bank branches, 309 (6 percent) of bank ATMs, and 70,977 (4 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has one AA in this rated area (St. Louis AA), which includes 12 (of 15) counties in the St. Louis MSA as of year-end 2015. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the St. Louis MMA

We performed a full-scope review of the St. Louis AA and rated the St. Louis MMA entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 51 percent home mortgage loans, 48 percent business loans, and 1 percent farm loans. Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the St. Louis AA.

LENDING TEST

Lending Test performance in the St. Louis MMA is rated Outstanding. Bank performance in the St. Louis AA is excellent based on a good level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the St. Louis AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 130 banks in area deposits as of June 30, 2015, with \$13.9 billion deposits and a 15.6 percent deposit market share.
- During the evaluation period, the bank reported \$6.7 billion home mortgage, business, and farm loans in the AA. It also originated \$385 million in CD loans specific to the AA.
- Of all loans reported in the St. Louis AA for the year 2015, the bank ranked fourth in the number and dollar volume of home mortgage loans, first in the number of business loans (second by dollar volume), and second in the number of farm loans (first by dollar volume). While lending market shares are generally less than the bank's deposit market share, this is a competitive market with more than 620 home loan reporters and at least 140 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the St. Louis AA is good, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of multifamily and business loans, a good distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the St. Louis AA is adequate based on adequate home refinance, adequate home improvement, and good home purchase distributions.

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase, home improvement, and home refinance loans.
 - The geographic distribution of home purchase loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.

- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is near its overall product share.
- The geographic distribution of home purchase loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home improvement loans is adequate.
 - The geographic distribution of home improvement loans in the 2012-2013 period is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans is adequate. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase, home improvement, and home refinance loans.
 - The geographic distribution of home refinance loans in the 2012-2013 period is adequate.
 - Market aggregate analysis elevates otherwise poor performance in moderate-income tracts to adequate. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies is near its overall product share.

- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is near its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the St. Louis AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the St. Louis AA is excellent based on additional market analysis, which elevates otherwise good performance to excellent. Market share reports reflect that of all reporting lenders, the bank reported the most business loans in both low- and moderate-income geographies during the evaluation period.

- The geographic distribution of reported business loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

- The geographic distribution of reported business loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the St. Louis AA is good. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported farm loan.

- The geographic distribution of reported farm loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank reported only one farm loan in low-income geographies during this period, farm lending opportunities are limited (84 farms). The 2015 market share report reflects a total of only four farm loans in low-income geographies by other reporting lenders.
- The geographic distribution of reported farm loans in the 2012-2013 period is adequate.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is somewhat lower than its overall product share.
 - Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank did not report any farm loans in low-income geographies during this period, farm lending opportunities are somewhat limited (111 farms). The 2013 market share report reflects a total of only one farm loan in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the St. Louis AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the St. Louis AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good.
 - The borrower distribution of home purchase loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers equals its overall product share.
 - The borrower distribution of home purchase loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is somewhat lower than (or near) its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good.
 - The borrower distribution of home refinance loans in the 2012-2013 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

- The borrower distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the St. Louis AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The overall distribution of reported loans to farms of different sizes in the St. Louis AA is adequate. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported farm loans.

- The distribution of loans reported to farms of different sizes in the 2014-2015 period is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.
- The distribution of loans reported to farms of different sizes in the 2012-2013 period is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the St. Louis AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made 59 CD loans totaling \$385.4 million during the evaluation period. By dollar volume, 48 percent of these loans fund revitalization projects, 35 percent provide affordable housing to LMI persons (1,137 units created or rehabilitated), and 17 percent support community services for LMI persons or promote economic development. The dollar volume of CD lending represents 45 percent of allocated Tier 1 Capital for the St. Louis AA.

CD loans include:

- A construction loan to develop a grocery store in a city-designated revitalization area. The project retains 77 jobs and creates 251 new jobs.
- A construction loan to remodel an office building in a moderate-income area. The project retains 182 jobs and creates 225 new jobs.

- A loan to acquire and rehabilitate a 202-unit historic building as part of a multifamily LIHTC project. All units are allocated to tenants earning 60 percent or less of the area median income.

INVESTMENT TEST

Investment Test performance in the St. Louis MMA is rated Outstanding. Bank performance in the St. Louis AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity. The bank made 410 investments totaling \$353.2 million during the evaluation period, plus another 349 qualifying grants and donations totaling \$4.5 million to at least 99 organizations. At year-end 2015, the bank also has 82 prior period investments with an aggregate outstanding balance of \$86.7 million and 15 unfunded commitments totaling \$32.3 million. The dollar volume of investments (excluding unfunded commitments) represents 26.2 percent of allocated Tier 1 Capital for the St. Louis AA.

Investments are particularly responsive to identified community development needs for revitalization/job creation and affordable housing. Almost all current period investments (\$354 million or 99 percent) serve these needs, including:

- Nine NMTCs, two HTC's, and a LIHTC totaling \$50.5 million to redevelop an historic building located in a moderate-income area. The project generated 107 new jobs, created 202 units of affordable housing, and contributed to the redevelopment of downtown St. Louis.
- Two NMTCs totaling \$12.2 million to develop a 165 acre industrial park in a moderate-income area. In this first development phase, a warehouse was constructed and is projected to generate 100-120 new jobs. The site will accommodate future buildings with uses from distribution to manufacturing.
- A \$6.87 million NMTC for an integrated full-service grocery store and food distribution and processing center. The facility will provide 100 jobs, reliable distribution and processing channels for local farmers, and a fresh food market to a neighborhood that has been without a grocery store for more than a decade.

SERVICE TEST

Service Test performance in the St. Louis MMA is rated Outstanding. Bank performance in the St. Louis AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the St. Louis AA, with consideration for MUI branches in close proximity to LMI geographies. The bank has nine branches in low-income geographies and 15 branches in moderate-income geographies. The percentage of branches in low-income tracts approximates, and the percentage of branches in moderate-income tracts is near, the percentage of the population respectively residing in each area. However, there are 11 MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to moderate-income areas. Access is further supported by excellent ATM distributions in both low- and moderate-income areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Branching activity has not adversely affected access to banking services. The bank opened three branches and closed three branches during the evaluation period. There were net closures in low-income tracts (one branch) and moderate-income tracts (one branch), plus net openings in middle-income tracts (two branches). Despite the closures, the bank maintains excellent branch distributions in LMI areas (with consideration for adjacent MUI branches). We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the St. Louis AA based on the bank's high level of services provided, strong leadership, and responsiveness to identified community development needs for homebuyer and general financial education. The bank provided 395 qualified service activities involving 73 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 167 of those activities with nearly 4,000 related service hours.

Service activities address a variety of CD initiatives and are responsive to financial education needs, including homebuyer education. Service activity examples during the evaluation period include:

- Bank staff provided 227 financial education programs to approximately 4,400 participants, including first-time homebuyers, small businesses, and youth.
- A bank employee provided more than 160 service hours as a four-year board member (including two years as Chair) of an organization that provides services and programs to revitalize downtown St. Louis.
- A bank employee provided more than 100 service hours as a three-year board member (including one year as Chair) of an organization that provides equity investments in small businesses that demonstrate the desire and ability to grow, but are unable to obtain the required capital.
- The bank also maintains eight Individual Development Account program relationships with community partners.

STATE RATED AREAS

State of Arizona

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to an identified community development need for revitalization/job creation, and the additional support of regional investments.
- Good service performance in the full-scope AA based on accessible retail delivery systems (with consideration for adjacent MUI branches), branching activity that has improved LMI access, and good CD service performance.
- Performance differences in the limited-scope AAs did not affect state ratings.

Refer to Tables 1-15 in the State of Arizona section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Arizona

The state of Arizona is the bank's 23rd largest rated area based on deposits. It accounts for \$1.7 billion (<1 percent) of bank deposits, 80 (3 percent) of bank branches, 98 (2 percent) of bank ATMs, and 55,603 (3 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has four AAs in this rated area, all of which are metropolitan areas. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Arizona

We performed a full-scope review of the Phoenix AA, which consists of the entire Phoenix-Mesa-Scottsdale MSA. Other AAs received limited-scope reviews.

The Phoenix AA is the bank's largest AA in this rated area based on deposits. It accounts for \$1.4 billion (84 percent) of rated area deposits, 64 (80 percent) of rated area branches, 82 (84 percent) of rated area ATMs, and 45,557 (82 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 62 percent home mortgage loans and 38 percent business loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Phoenix AA.

LENDING TEST

Lending Test performance in the state of Arizona is rated Outstanding. Bank performance in the full-scope Phoenix AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Phoenix AA)

Bank performance in the full-scope Phoenix AA is excellent based on an excellent level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Phoenix AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked eighth of 58 banks in area deposits as of June 30, 2015, with \$1.4 billion deposits and a 1.8 percent deposit market share.
- During the evaluation period, the bank reported \$6.4 billion home mortgage, business, and farm loans in the AA. It also originated \$55 million in CD loans specific to the AA.
- Of all loans reported in the Phoenix AA for the year 2015, the bank ranked third in the number and dollar volume of home mortgage loans, seventh in the number of business loans (tenth by dollar volume), and fourth in the number of farm loans (17th by dollar volume). The bank's lending market shares generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Phoenix AA is good, as evidenced by a good distribution of home mortgage loans, excellent distributions of multifamily and business loans, a poor distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Phoenix AA is good based on good home purchase, adequate home improvement, and adequate home refinance distributions. Our assessment gives the most weight to home purchase loans as they account for 58 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate overall.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate.
 - Market aggregate analysis elevates otherwise poor performance in moderate-income tracts to adequate. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (is near) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Phoenix AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Phoenix AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in both low- and moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Phoenix AA is poor. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is significantly below its overall product share.
- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of farm loans in low-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Phoenix AA is adequate, as evidenced by adequate distributions of home mortgage and farm loans, and a good distribution of business loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Phoenix AA is adequate based on adequate home purchase, adequate home refinance, and good home improvement distributions.

- The borrower distribution of home purchase loans is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is somewhat lower than its overall product share.

- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Phoenix AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Phoenix AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Phoenix AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made 10 CD loans totaling \$54.5 million during the evaluation period. By dollar volume, 42 percent of these loans fund revitalization projects, 31 percent support community services for LMI persons, and 27 percent provide affordable housing to LMI persons. CD loans include a loan to rehabilitate an historic building in a SBA-designated HUBZone and NMTC-qualified distressed area. The project creates 105 new jobs. The dollar volume of CD lending represents 31 percent of allocated Tier 1 Capital for the Phoenix AA.

Statewide CD lending provides additional support for our assessment. The bank made two CD loans totaling \$10.6 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Phoenix AA. The dollar volume of statewide CD lending represents 5 percent of allocated Tier 1 Capital for the state of Arizona.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 4,431 flexible loans totaling \$794.1 million statewide through the products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 379 percent of allocated Tier 1 Capital for the state of Arizona.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited scope AAs did not impact the Lending Test rating for the state of Arizona. Lending performance is weaker/good in the Prescott and Tucson AAs, representing 9 percent of rated area deposits. Lending performance is weaker/poor in the Lake Havasu City-Kingman AA, representing 7 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending, as well less favorable borrower and geographic distributions (Lake Havasu City-Kingman AA).

INVESTMENT TEST

Investment Test performance in the state of Arizona is rated Outstanding. Bank performance in the full-scope Phoenix AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Phoenix AA)

Bank performance in the full-scope Phoenix AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 59 investments totaling \$48.3 million during the evaluation period, plus another 90 qualifying grants and donations totaling \$527 thousand to at least 35 organizations. The bank also has 16 prior period investments with an aggregate outstanding balance of \$22.3 million and one unfunded commitment totaling \$14 thousand. The dollar volume of investments (excluding unfunded commitments) represents 40.4 percent of allocated Tier 1 Capital for the Phoenix AA.

Investments are particularly responsive to an identified community development need for revitalization/job creation. Most current period investments (\$39.1 million or 80 percent) serve this need, including:

- Two NMTCs totaling \$9.5 million to renovate and repurpose an historic building into a hotel. The project created 105 jobs in a SBA-designated HUBZone and a NMTC distressed area.
- Two NMTCs totaling \$4.1 million to build-out a floor and expand inpatient capacity within a local hospital. The project created 30 construction jobs and is expected to create up to 90 permanent jobs upon completion.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 15 such investments (current and prior period) totaling \$159 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Arizona.

Because the bank was responsive to community development needs and opportunities in the Phoenix AA, broader statewide investments that provide only indirect benefit were considered and further support performance. Elsewhere in the state, the bank has 34 investments (current and prior period) totaling \$47.1 million and one unfunded commitment totaling \$25.8 million. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 22.5 percent of allocated Tier 1 Capital for the state of Arizona.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Arizona.

SERVICE TEST

Service Test performance in the state of Arizona is rated High Satisfactory. Bank performance in the full-scope Phoenix AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Phoenix AA)

Bank performance in the full-scope Phoenix AA is good based on accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Phoenix AA, with consideration for MUI branches in close proximity to LMI geographies. The bank has one branch in a low-income geography and 13 branches in moderate-income geographies. The percentage of branches in low-income tracts is significantly below, and the percentage of branches in moderate-income tracts is near, the percentage of the population respectively residing in each area. However, there are six MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to moderate-income areas. Access is further supported by overall good ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, mobile banking, and ATMs by customers residing in LMI areas.

Branching activity has improved LMI access to banking services. The bank opened six branches and closed six branches during the evaluation period. There was one net branch opening in both moderate- and upper-income tracts, and three net branch closures in middle-income tracts. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average more than 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and a majority are open Sunday. In addition, a larger share of the branches in LMI areas are traditional branches.

Community Development Services

CD service performance is good in the Phoenix AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 150 qualified service activities involving 27 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 49 of those activities and nearly 1,200 related service hours. Service activities address a variety of CD initiatives, including financial education. Bank staff provided 100 financial education programs to more than 3,200 participants, including first-time homebuyers and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Arizona. Service performance is stronger/excellent in the Tucson AA, representing 7 percent of rated area deposits. Service performance is weaker/adequate in the Lake Havasu City-Kingman and Prescott AAs, representing 9 percent of rated area deposits. Stronger (or weaker) performance is attributable to more (or less) accessible retail delivery systems.

State of Arkansas

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance. Weaker lending performance in the limited-scope AAs negatively impacts our assessment and results in an overall good lending performance conclusion for the state.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to affordable housing needs, and the additional support of regional investments. Investment performance differences in the limited-scope areas did not affect the state rating.
- Good service performance in the full-scope AA based on accessible retail delivery systems (with emphasis on moderate-income areas) and good CD service performance. Service performance differences in the limited-scope areas did not affect the state rating.

Refer to Tables 1-15 in the State of Arkansas section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Arkansas

The state of Arkansas is the bank's 29th largest rated area based on deposits. It accounts for \$943 million (<1 percent) of bank deposits, 42 (1 percent) of bank branches, 44 (1 percent) of bank ATMs, and 19,963 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has seven AAs in this rated area, three of which are metropolitan areas. The four nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Arkansas

We performed a full-scope review of the Little Rock AA, which includes five (of six) counties in the Little Rock-North Little Rock-Conway MSA. Other AAs received limited-scope reviews.

The Little Rock AA is the bank's largest AA in this rated area based on deposits. It accounts for \$560 million (59 percent) of rated area deposits, 21 (50 percent) of rated area branches, 22 (50 percent) of rated area ATMs, and 13,591 (68 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 63 percent home mortgage loans, 36 percent business loans, and less than 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Little Rock AA.

LENDING TEST

Lending Test performance in the state of Arkansas is rated High Satisfactory. Bank performance in the full-scope Little Rock AA is excellent, but weaker performance in the limited-scope areas has negative impact and results in an overall good lending performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Little Rock AA)

Bank performance in the full-scope Little Rock AA is excellent based on an excellent level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Little Rock AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked ninth of 31 banks in area deposits as of June 30, 2015, with \$560 million deposits and a 3.6 percent deposit market share.
- During the evaluation period, the bank reported \$1.5 billion home mortgage, business, and farm loans in the AA. It also originated \$15 million in CD loans specific to the AA.
- Of all loans reported in the Little Rock AA for the year 2015, the bank ranked second in the number and dollar volume of home mortgage loans, second in the number of business loans (seventh by dollar volume), and fifth in the number of farm loans (ninth by dollar volume). The bank's lending market shares generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Little Rock AA is good, as evidenced by a good distribution of home mortgage loans, adequate distributions of business and farm loans, and no unexplained lending gaps. Our assessment gives the most weight to home mortgage loans as they account for 63 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Little Rock AA is good based on good home purchase, good home improvement, and adequate home refinance distributions.

- The geographic distribution of home purchase loans is good.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in moderate-income geographies by other lenders. The bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to good. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise poor performance in moderate-income tracts to adequate. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but is still somewhat lower than) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Little Rock AA is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is lower than its overall product share. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Little Rock AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in low-income geographies is significantly below its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Little Rock AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Little Rock AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is good overall.

- Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Little Rock AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Little Rock AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Little Rock AA. The bank demonstrated an excellent responsiveness to CD lending needs and opportunities. The bank made 12 CD loans totaling \$15.5 million during the evaluation period. By dollar volume, 51 percent of these loans fund revitalization projects, 26 percent provide affordable housing to LMI persons, and 23 percent support community services for LMI persons. CD loans include a term loan to acquire land, purchase software and equipment, and construct a municipal building in an underserved neighborhood. The facility includes new police, fire, and information technology departments, and provides safety and stability for the moderate-income area in which it is located. The dollar volume of CD lending represents 23 percent of allocated Tier 1 Capital for the Little Rock AA.

Statewide CD lending has a neutral impact on performance. The bank made four CD loans totaling \$2.6 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The dollar volume of statewide CD lending represents 2 percent of allocated Tier 1 Capital for the state of Arkansas.

Regional CD lending provides additional support for our assessment. The bank made six CD loans totaling \$82.8 million in the West South Central Division, which includes the states of Arkansas, Louisiana, Oklahoma, and Texas. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Little Rock AA. The dollar volume of regional CD lending represents another 72 percent of allocated Tier 1 Capital for the state of Arkansas.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 4,874 loans totaling \$701.6 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 609 percent of allocated Tier 1 Capital for the state of Arkansas.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did negatively impact our assessment and result in an overall good lending performance conclusion and High Satisfactory Lending Test rating for the state of Arkansas. Lending performance is weaker/good in the Hot Springs AA, representing 15 percent of rated area deposits. Lending performance is weaker/adequate in the Fort Smith and the nonmetropolitan AAs, collectively representing 26 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending, less favorable borrower distributions (Fort Smith and nonmetropolitan AAs), and less favorable geographic distributions (Hot Springs and nonmetropolitan AAs).

INVESTMENT TEST

Investment Test performance in the state of Arkansas is rated Outstanding. Bank performance in the full-scope Little Rock AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Little Rock AA)

Bank performance in the full-scope Little Rock AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 105 investments totaling \$23.4 million during the evaluation period, plus another 59 qualifying grants totaling \$197 thousand to at least 25 organizations. The bank also has 18 prior period investments with an aggregate outstanding balance of \$13.3 million and one unfunded commitment totaling \$110 thousand. The dollar volume of investments (excluding unfunded commitments) represents 53.9 percent of allocated Tier 1 Capital for the Little Rock AA.

Investments are particularly responsive to affordable housing needs. Most current period investments (\$14.7 million or 62.3 percent) have this community development purpose, including eighteen LIHTCs totaling \$8.1 million to construct 52 units of low-income senior housing. All units are affordable to tenants earning 60 percent or less of the AMI.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has four such investments (all current period) totaling \$11 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Arkansas.

Because the bank was responsive to community development needs and opportunities in the Little Rock AA, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 39 investments (current and prior period) totaling \$38.6 million and two unfunded commitments totaling \$90 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 33.5 percent of allocated Tier 1 Capital for the state of Arkansas.
- The bank also has 774 regional investments (current and prior period) totaling \$578.1 million, and 23 unfunded commitments totaling \$33.6 million, in the broader West South Central Division, which includes the state of Arkansas. The dollar volume of these regional investments (excluding unfunded commitments) is five times the allocated Tier 1 Capital for the state of Arkansas.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is consistent/excellent in the AR NonMSA AA, representing 21 percent of rated area deposits. Investment performance is weaker/good in the Fort Smith and Hot Springs AAs, representing 19.6 percent of rated area deposits. Weaker performance is attributable to a lower relative investment volume. These performance differences did not impact the Investment Test rating for the state of Arkansas.

SERVICE TEST

Service Test performance in the state of Arkansas is rated High Satisfactory. Bank performance in the full-scope Little Rock AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Little Rock AA)

Bank performance in the full-scope Little Rock AA is good based on accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Little Rock AA. Our assessment weights performance in moderate-income areas more heavily, which are four times as populated. The bank has no branches in low-income tracts and seven branches in moderate-income tracts. The distribution of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Branching activity has not adversely affected access to banking services. There was one branch closure in a moderate-tract during the evaluation period, but the bank maintains an excellent branch distribution in moderate-income areas. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Little Rock AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 102 qualified service activities involving 47 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 40 of those activities and more than 750 related service hours. Service activities address a variety of CD initiatives, including financial education. Bank staff provided 62 financial education programs to more than 1,600 participants, including first-time homebuyers and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Arkansas. Service performance is consistent/good in the Fort Smith AA, representing 5 percent of rated area deposits. Service performance is stronger/ excellent in the Hot Springs and the nonmetropolitan AAs, collectively representing 36 percent of rated area deposits. Stronger performance is attributable to more accessible retail delivery systems.

State of California

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AAs based on good overall borrower distributions, good overall geographic distributions, at least adequate levels of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AAs based on investment activity and responsiveness to identified community development needs for affordable rental housing in the Los Angeles AA and affordable housing in the Sacramento AA.
- Good overall service performance in the full-scope AAs based on accessible retail delivery systems (with consideration of adjacent MUI branches) and at least good CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of California section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of California

The state of California is the bank's 3rd largest rated area based on deposits. It accounts for \$34.1 billion (12.2 percent) of bank deposits, 645 (21 percent) of bank branches, 718 (15 percent) of bank ATMs, and 304,567 (17 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 27 AAs in this rated area, 23 of which are metropolitan areas. The four nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of California

We performed full-scope reviews of the Los Angeles and Sacramento AAs. The Los Angeles AA consists of the entire Los Angeles-Long Beach-Glendale MSA. The Sacramento AA consists of the entire Sacramento-Arden Arcade-Roseville MSA. Other AAs received limited-scope reviews.

The Los Angeles AA is the bank's largest AA in this rated area based on deposits. It accounts for \$7.8 billion (23 percent) of rated area deposits, 140 (22 percent) of rated area branches, 153 (21 percent) of rated area ATMs, and 73,924 (24 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 71 percent business loans, 29 percent home mortgage loans, and less than 1 percent farm loans.

The Sacramento AA is the second largest AA in this rated area based on deposits. It accounts for \$7.7 billion (22 percent) of rated area deposits, 52 (8 percent) of rated area branches, 59 (8 percent) of rated area ATMs, and 23,648 (8 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 64 percent business loans, 35 percent home mortgage loans, and 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the full-scope AAs.

LENDING TEST

Lending Test performance in the state of California is rated Outstanding. Bank performance in the full-scope Los Angeles and Sacramento AAs is excellent, and performance differences in the limited-scope AAs did not impact the rating. An excellent level of flexible lending in the state further supports lending performance.

Conclusions for Areas Receiving Full-Scope Reviews

Los Angeles AA

Bank performance in the full-scope Los Angeles AA is excellent based on an excellent level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Los Angeles AA reflect excellent responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked 10th of 110 banks in area deposits as of June 30, 2015, with \$7.8 billion deposits and a 2.3 percent deposit market share.
- During the evaluation period, the bank reported \$10.0 billion home mortgage, business, and farm loans in the AA. It also originated \$898 million in CD loans specific to the AA.
- Of all loans reported in the Los Angeles AA for the year 2015, the bank ranked 11th in the number of home mortgage loans (eighth by dollar volume), seventh in the number and dollar volume of business loans, and third in the number of farm loans (sixth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 820 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Los Angeles AA is good, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of multifamily, business, and farm loans, and no unexplained lending gaps. Our assessment gives the most weight to business and home mortgage loans, as these products respectively account for 71 percent and 29 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Los Angeles AA is adequate based on excellent home purchase, poor home improvement, and poor home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is near its overall product share. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is poor overall.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans is poor. The percentage of bank loans in both low- and moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in both low- and moderate-income geographies is lower than its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Los Angeles AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Los Angeles AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator. The bank's market share of business loans in both low- and moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Los Angeles AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in both low- and moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Los Angeles AA is good, as evidenced by a good distribution of business loans, and adequate distributions of home mortgage and farm loans. Our assessment gives the most weight to business loans as they account for 71 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Los Angeles AA is adequate based on adequate home refinance, adequate home improvement, and poor home purchase distributions.

- Consideration for the area's high cost of housing, shortage of affordable housing stock, and market aggregate performance elevates otherwise very poor performance to poor for the borrower distribution of home purchase loans. While the bank's home purchase borrower distributions and market shares are very poor, bank performance is better in comparison to (although still lower than) the aggregate percentage of home purchase lending to both low- and moderate-income borrowers by other reporting lenders.
- The borrower distribution of home improvement loans is adequate.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home improvement lending to low-income borrowers by other lenders. The bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is adequate.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers is near its overall product share.

- Market aggregate analysis elevates otherwise poor performance in the moderate-income sector to adequate. The percentage of bank loans to moderate-income borrowers lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to moderate-income borrowers by other lenders. The bank's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Los Angeles AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Los Angeles AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Los Angeles AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 88 CD loans totaling \$898.5 million during the evaluation period. By dollar volume, 56 percent of these loans fund revitalization projects, 24 percent provide affordable housing to LMI persons, 18 percent support community services for LMI persons, and 3 percent promote economic development. CD lending created or rehabilitated 3,288 affordable housing units, an identified and critical need in the Los Angeles AA. The dollar volume of CD lending represents 94 percent of allocated Tier 1 Capital for the Los Angeles AA.

CD loans include:

- Construction financing for the development of a 78-unit LIHTC housing project for seniors. All units (except a manager unit) are allocated to tenants earning 60 percent or less of the area median income.
- Construction financing for a 162-unit multifamily housing development with ground floor retail space. The project, which is located in a low-income census tract in the Los Angeles Renewal Community, the South Park Business Improvement District, and a SBA-designated HUBZone, promotes the objectives of the City Center Redevelopment Plan by preventing the spread of blight and promoting economic development.

Sacramento AA

Bank performance in the full-scope Sacramento AA is excellent based on an adequate level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Sacramento AA reflect adequate responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 40 banks in area deposits as of June 30, 2015, with \$7.7 billion deposits and a 16.8 percent deposit market share.
- During the evaluation period, the bank reported \$2.6 billion home mortgage, business, and farm loans in the AA. It also originated \$269 million in CD loans specific to the AA.
- Of all loans reported in the Sacramento AA for the year 2015, the bank ranked 12th in the number and dollar of home mortgage loans, fourth in the number of business loans (second by dollar volume), and third in the number of farm loans (tenth by dollar volume). While lending market shares are less than the bank's deposit market share, this is a competitive market for home lending (more than 620 reporters) and business/farm lending (at least 100 reporters).

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Sacramento AA is good, as evidenced by a good distribution of home mortgage and business loans, an excellent distribution of multifamily loans, an adequate distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Sacramento AA is good based on excellent home purchase, good home improvement, and adequate home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.

- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is somewhat lower than its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Sacramento AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Sacramento AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of reported business loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of reported business loans in low-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Sacramento AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Market analysis elevates otherwise very poor performance in moderate-income tracts to adequate. The bank reported 11 farm loans in moderate-income geographies during the evaluation period. Market share reports reflect a total of 89 farm loans in moderate-income geographies by other reporting lenders during the entire evaluation period.

- Context and market analysis elevate otherwise poor performance in low-income tracts to good. While the bank reported only four farm loans in low-income geographies during the evaluation period, farm lending opportunities are somewhat limited (149 farms). Market share reports reflect a total of 18 farm loans in low-income geographies during the entire evaluation period by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Sacramento AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Sacramento AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good.
 - Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Sacramento AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Sacramento AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Sacramento AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 26 CD loans totaling \$268.8 million during the evaluation period. By dollar volume, 72 percent of these loans support community services for LMI persons, 26 percent provide affordable housing to LMI persons, and the remainder fund community revitalization projects. CD lending created or rehabilitated 1,179 affordable housing units, an identified need in the Sacramento AA. The dollar volume of CD lending represents 29 percent of allocated Tier 1 Capital for the Sacramento AA.

CD loans include:

- Construction financing for a new 48-unit LIHTC multi-family housing project. Almost all units (47) are allocated to tenants earning 50 percent or less of the area median income.
- A working capital line of credit to a locally-based, regional center that provides support services to persons with life-long developmental disabilities and at-risk children.

Statewide and Regional Community Development Lending

Statewide CD lending has a neutral impact on performance. The bank made 17 CD loans totaling \$19.8 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another eight CD loans totaling \$21.8 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the full-scope AAs. The combined volume of statewide CD lending represents 1 percent of allocated Tier 1 Capital for the state of California.

Regional CD lending has a neutral impact on performance. The bank made two CD loans totaling \$12.3 million in the Pacific Division, which includes the states of Alaska, California, Hawaii, Oregon, and Washington. Broader regional lending can also be considered because the bank is responsive to CD needs and opportunities in the full-scope AAs. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of California, Oregon, and Washington, as well as the multistate metropolitan areas of Lewiston and Portland.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 11,578 loans totaling \$4.3 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 102 percent of allocated Tier 1 Capital for the state of California.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of California. Lending performance is consistent/excellent in five limited-scope AAs, collectively representing 26 percent of rated area deposits (Oakland-Haywood-Berkeley, San Diego-Carlsbad-San Marcos, San Francisco-Redwood City-South San Francisco, Santa Rosa, and nonmetropolitan AAs). Lending performance is weaker/adequate in three limited-scope AAs (San Luis Obispo-Paso Robles, Santa Cruz-Watsonville, and Yuba City AAs), collectively representing 1 percent of rated area deposits. Lending performance is weaker/good in the remaining 14 limited-scope AAs, collectively representing 28 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending (Chico, Modesto, Napa, Redding, San Luis Obispo-Paso Robles-Arroyo Grande, San Rafael, Santa Cruz-Watsonville, Vallejo-Fairfield, and Yuba City AAs), less favorable borrower and geographic distributions (Anaheim-Santa Ana-Irvine, Bakersfield, Salinas, San Jose-Sunnyvale-Santa Clara, and Santa Cruz-Watsonville AAs), less favorable borrower distributions (Oxnard-Thousand Oaks-Ventura, San Luis Obispo-Paso Robles, Santa Maria-Santa Barbara, and Stockton-Lodi AAs), and less favorable geographic distributions (Riverside-San Bernardino-Ontario, and Yuba City AAs).

INVESTMENT TEST

Investment Test performance in the state of California is rated Outstanding. Bank performance in the full-scope Los Angeles and Sacramento AAs is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in both full-scope AAs is excellent in relation to bank capacity, identified needs, and available investment opportunities.

Los Angeles AA

USB demonstrated an excellent level of investment activity with 506 investments totaling \$273.3 million during the evaluation period, plus another 613 qualifying grants and donations totaling \$6.7 million to at least 222 organizations. The bank also has 90 prior period investments with an aggregate outstanding balance of \$82.7 million and eight unfunded commitments totaling \$4.7 million. The dollar volume of investments (excluding unfunded commitments) represents 37.9 percent of allocated Tier 1 Capital for the Los Angeles AA.

Investments are particularly responsive to an identified community development need for affordable rental housing. Most current period investments (\$192.6 million or 68.8 percent) serve this need, including:

- A \$16.8 million LIHTC to construct a housing project with a mix of affordable multifamily and Mental Health Services Act Housing Program housing. All 62 units, less a manager's unit, are affordable to tenants earning 60 percent or less of the AMI.
- A \$23.1 million LIHTC to construct an affordable apartment building with 79 (of 80) units affordable to tenants earning 60 percent or less of the AMI.
- Thirty-six LIHTCs totaling \$15.1 million to construct affordable multi-family senior housing project with 88 (of 89) units affordable to tenants earning 60 percent or less of the AMI.

Sacramento AA

USB demonstrated an excellent level of investment activity with 166 investments totaling \$92.2 million during the evaluation period, plus another 215 qualifying grants totaling \$2.3 million to at least 97 organizations. The bank also has 131 prior period investments with an aggregate outstanding balance of \$63.0 million. The dollar volume of investments represents 16.9 percent of allocated Tier 1 Capital for the Sacramento AA (excluding unfunded commitments).

Investments are particularly responsive to an identified and critical community development need for affordable housing. Most current period investments (\$58.3 million or 61.7 percent) serve this need, including:

- Forty-one LIHTCs totaling \$18.6 million to fund a two-phase senior and family affordable rental housing project. The project created 58 units affordable to seniors earning 60 percent or less of the AMI and 109 units targeted to families earning 30 to 50 percent of the AMI.
- Thirty-three LIHTCs totaling \$11.2 million to construct affordable multi-family rental housing. The project created 48 units affordable to persons earning 30 to 50 percent of the AMI.
- A \$6.3 million mortgage bond to construct an affordable multi-family housing community with 140 units.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 122 such investments (current and prior period) totaling \$22.3 million. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of California.

Because the bank was responsive to community development needs and opportunities in the full-scope AAs, broader statewide and regional investments that provide only indirect benefit were considered and have a neutral impact on performance.

- Elsewhere in the state, the bank has 66 investments (current and prior period) totaling \$59.5 million and three unfunded commitments totaling \$5.4 million. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 1.4 percent of allocated Tier 1 Capital for the state of California.

- The bank also has 54 regional investments (current and prior period) totaling \$56.1 million, and three unfunded commitments totaling \$68 thousand, in the broader Pacific Division, which includes the states of California, Oregon, and Washington. The dollar volume of these regional investments (excluding unfunded commitments) represents less than 1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Portland MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of California.

SERVICE TEST

Service Test performance in the state of California is rated High Satisfactory. Bank performance in the full-scope Los Angeles and Sacramento AAs is overall good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in the full-scope AAs is overall good. Our assessment gives more weight to performance in the Los Angeles AA as it accounts for a larger share of the bank's deposits.

Los Angeles AA

Bank performance in the full-scope Los Angeles AA is good based on accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Los Angeles AA. Our assessment recognizes MUI branches in close proximity to LMI geographies and gives more weight to performance in moderate-income areas, which are four times as populated. The bank has eight branches in low-income geographies and 22 branches in moderate-income geographies. The percentage of branches in low-income tracts is near, and the percentage of branches in moderate-income tracts is somewhat lower than, the percentage of the population respectively residing in each area. However, there are 17 MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is further supported by the availability and demonstrated usage of the call center, interactive voice response, mobile banking, and ATMs by customers residing in low- and/or moderate-income areas.

Discretionary branching activity has not adversely affected LMI access to banking services. The bank opened seven branches and closed 17 branches during the evaluation period. There were net closures in moderate-income tracts (two branches), middle-income tracts (one branch), and upper-income tracts (seven branches). The moderate-tract branch closures result from grocery store closures that were not within bank control. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average approximately 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and one-third are open Sunday. In addition, a larger share of the branches in LMI areas are traditional branches.

Community Development Services

CD service performance is excellent in the Los Angeles AA based on the bank's high level of services provided, strong leadership, and responsiveness to an identified community need for general financial education and small business technical assistance. The bank provided 479 qualified service activities involving 110 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 190 of those activities and nearly 3,200 related service hours.

Service activities address a variety of CD initiatives and are responsive to identified needs for financial education and small business technical assistance. Service activity examples during the evaluation period include:

- Bank staff provided 268 financial education programs to more than 2,800 participants, including small business seminars, loss mitigation and foreclosure prevention workshops, and youth programs.
- A bank employee provided more than 140 service hours as a three-year Board Chair and one-year Finance Committee Chair of an organization that provides a range of community development services and programs related to housing, health, education, and economic development.
- A bank employee provided more than 120 service hours as a four-year board member (including two years as Chair) of an affordable housing organization that helps families transition out of homelessness and poverty.

Sacramento AA

Bank performance in the full-scope Sacramento AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Sacramento AA, with consideration for MUI branches in close proximity to LMI geographies. The bank has five branches in low-income geographies and nine branches in moderate-income geographies. The percentage of branches in low-income tracts exceeds, and the percentage of branches in moderate-income census tracts is near, the percentage of the population respectively residing in each area. However, there are eight MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to moderate-income areas.

Branching activity has not adversely affected access to banking services. The bank opened three branches and closed two branches during the evaluation period. There was one net branch closure in low-income geographies and two net branch openings in upper-income geographies. Despite the closure, the bank maintains an excellent branch distribution in low-income areas. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average close to 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and more than one-third are open Sunday. In addition, a larger share of the branches in LMI areas are traditional branches.

Community Development Services

CD service performance is good in the Sacramento AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 122 qualified service activities involving 38 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 55 of those activities and approximately 1,100 related service hours. Service activities address a variety of CD initiatives, including financial education. Bank staff provided 63 financial education programs to more than 1,500 participants, including small businesses and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of California. Service performance is consistent/good in eight limited-scope AAs, collectively representing 42 percent of rated area deposits (Anaheim-Santa Ana-Irvine, Oakland-Haywood-Berkeley, Riverside-San Bernardino-Ontario, Salinas, San Diego-Carlsbad-San Marcos, San Francisco-Redwood City-South San Francisco, San Rafael, and Santa Maria-Santa Barbara AAs). Service performance is stronger/ excellent in nine limited-scope AAs, collectively representing 7 percent of rated area deposits (Chico, Modesto, Napa, Redding, San Luis Obispo-Paso Robles-Arroyo Grande, Santa Rosa, Vallejo-Fairfield, Yuba City, and the nonmetropolitan AAs). Service performance is weaker/adequate in two limited-scope AAs (Bakersfield and San Jose-Sunnyvale-Santa Clara AAs), collectively representing 4 percent of rated area deposits. Service performance is weaker/poor in three limited-scope AAs (Oxnard-Thousand Oaks-Ventura, Santa Cruz-Watsonville, and Stockton-Lodi AAs), collectively representing 2 percent of rated area deposits. Stronger (or weaker) performance is attributable to more (or less) accessible retail delivery systems.

State of Colorado

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, excellent geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to an identified community development need for affordable housing.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems (with consideration for adjacent MUI branches, ATM distributions, and ADS usage), branching activity that has improved access, and good CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Colorado section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Colorado

The state of Colorado is the bank's 7th largest rated area based on deposits. It accounts for \$11.6 billion (4.2 percent) of bank deposits, 153 (5 percent) of bank branches, 234 (5 percent) of bank ATMs, and 111,307 (6 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 11 AAs in this rated area, seven of which are metropolitan areas. The four nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Colorado

We performed a full-scope review of the Denver AA, which includes six (of 10) counties in the Denver-Aurora-Lakewood MSA. Other AAs received limited-scope reviews.

The Denver AA is the bank's largest AA in this rated area based on deposits. It accounts for \$8.8 billion (76 percent) of rated area deposits, 82 (54 percent) of rated area branches, 138 (59 percent) of rated area ATMs, and 66,247 (60 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 55 percent business loans, 45 percent home mortgage loans, and less than 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Denver AA.

LENDING TEST

Lending Test performance in the state of Colorado is rated Outstanding. Bank performance in the full-scope Denver AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Denver AA)

Bank performance in the full-scope Denver AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Denver AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked third of 70 banks in area deposits as of June 30, 2015, with \$8.8 billion deposits and a 12.7 percent deposit market share.
- During the evaluation period, the bank reported \$7.8 billion home mortgage, business, and farm loans in the AA. It also originated \$335 million in CD loans specific to the AA.
- Of all loans reported in the Denver AA for the year 2015, the bank ranked third in the number and dollar volume of home mortgage loans, third in the number and dollar volume of business loans, and first in the number of farm loans (fourth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 760 home loan reporters. The bank's lending market shares for other products (by number of loans) exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Denver AA is excellent, as evidenced by a good distribution of home mortgage loans, an excellent distribution of business loans, an adequate distribution of farm loans, and no unexplained lending gaps. Our assessment gives the most weight to business loans and home mortgage loans, as these products respectively account for 55 percent and 45 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Denver AA is good based on an excellent home purchase, adequate home improvement, and good home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies essentially equals or exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans is good. The percentage of bank loans in both low- and moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in both low- and moderate-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Denver AA is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Denver AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of farm loans in low-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Denver AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Denver AA is good based on good home purchase, good home refinance, and adequate home improvement distributions.

- The borrower distribution of home purchase loans is good.
 - Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home improvement loans is adequate.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home improvement lending to low-income borrowers by other lenders. The bank's market share of home improvement loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Denver AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Denver AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Denver AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 42 CD loans totaling \$335.5 million during the evaluation period. By dollar volume, 63 percent of these loans fund revitalization projects, 31 percent provide affordable housing to LMI persons (513 units created or rehabilitated), 3 percent promote economic development, and the remainder support community services for LMI persons. The dollar volume of CD lending represents 31 percent of allocated Tier 1 Capital for the Denver AA.

CD loans include:

- A term loan to renovate a historic building and convert it into a 230-room hotel with other guest amenities. The building is located in a city-designated Urban Renewal Area and the project serves to prevent economic, physical, and environment deterioration of a blighted area, create long-term job opportunities, and act as a catalyst for further revitalization.
- Financing to build a 103-unit LIHTC multifamily housing development, with 102 units allocated to tenants earning between 30 to 60 percent of the area median income.

Statewide CD lending has a neutral impact on performance. The bank made five CD loans totaling \$1.9 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Denver AA. The dollar volume of statewide CD lending represents less than 1 percent of allocated Tier 1 Capital for the state of Colorado.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 6,456 loans totaling \$1.5 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 103 percent of allocated Tier 1 Capital for the state of Colorado.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Colorado. Lending performance is consistent/excellent in four limited-scope AAs, collectively representing 14 percent of rated area deposits (Boulder, Colorado Springs, Fort Collins, and Grand Junction AAs). Lending performance is weaker/good in three limited-scope AAs, collectively representing 9 percent of rated area deposits (Greeley, Pueblo, and nonmetropolitan AAs). Weaker performance is attributable to less favorable borrower and geographic distributions (Greeley and nonmetropolitan AAs) and less favorable geographic distributions (Pueblo AA).

INVESTMENT TEST

Investment Test performance in the state of Colorado is rated Outstanding. Bank performance in the full-scope Denver AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Denver AA)

Bank performance in the full-scope Denver AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 277 investments totaling \$155.9 million during the evaluation period, plus another 166 qualifying grants and donations totaling \$2.4 million to at least 67 organizations. The bank also has 36 prior period investments with an aggregate outstanding balance of \$37.6 million and one unfunded commitment totaling \$40 thousand. The dollar volume of investments (excluding unfunded commitments) represents 18.2 percent of allocated Tier 1 Capital for the Denver AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$86.2 million or 54.4 percent) serve this need, including:

- Twenty-six LIHTCs totaling \$10.3 million to develop a 92-unit residential community affordable to families earning between 30 and 50 percent of the AMI.
- Forty LIHTCs totaling \$12.5 million, and 55 NMTCs totaling \$369 thousand, to develop a five-story, mixed-use project that includes 78 units of housing for homeless persons and a health center. The project increases (by 75 percent) the health center's capacity to provide integrated care to more than 15,000 homeless persons annually.
- An \$11.6 million LIHTC to construct an affordable senior housing complex with all 66 units affordable to seniors earning 60 percent or less of the AMI.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 33 such investments (current and prior period) totaling \$1.4 million. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Colorado.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Colorado.

SERVICE TEST

Service Test performance in the state of Colorado is rated Outstanding. Bank performance in the full-scope Denver AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Denver AA)

Bank performance in the full-scope Denver AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Denver AA. Our assessment recognizes MUI branches in close proximity to LMI geographies and positively considers ATM distributions and ADS usage. The bank has six branches in low-income geographies and 17 branches in moderate-income geographies. The percentage of branches in low-income tracts is somewhat lower, and the percentage of branches in moderate-income tracts is near, the percentage of the population respectively residing in each area. However, there are 14 MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is expanded by excellent ATM distributions in both low- and moderate-income areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

Branching activity improved access to banking services. The bank opened five branches and closed two branches during the evaluation period. There were net openings in low-income tracts (one branch) and middle-income tracts (two branches), plus one net branch closure in upper-income tracts. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average more than 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and one-third are open Sunday. In addition, a larger share of the branches in LMI areas have drive-up facilities and are traditional branches.

Community Development Services

CD service performance is good in the Denver AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 305 qualified service activities involving 70 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 114 of those activities and more than 2,700 related service hours. Service activities address a variety of CD initiatives, including financial education. Bank staff provided 190 financial education programs to nearly 4,500 primarily youth participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Colorado. Service performance is consistent/excellent in the Colorado Springs AA, representing 7 percent of rated area deposits. Service performance is weaker/good in the Boulder AA, representing 4 percent of rated area deposits. Service performance is weaker/adequate in the Fort Collins, Grand Junction, Pueblo, and nonmetropolitan AAs, collectively representing 13 percent of rated area deposits. Service performance is weaker/very poor in the Greeley AA, representing less than 1 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Florida

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

The major factors that support this rating include:

- Good lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, and an excellent level of lending activity. The negative impact of CD lending is countered by the positive impact of flexible lending.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to revitalization/job creation needs, and the additional support of regional investments.
- Adequate service performance in the full-scope AA based on reasonably accessible retail delivery systems (with consideration for the bank's operational strategy).
- Performance differences in the limited-scope area did not affect state ratings.

Refer to Tables 1-15 in the State of Florida section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Florida

The state of Florida is the bank's 40th (smallest) rated area based on deposits. It accounts for \$18 million (<1 percent) of bank deposits, two (<1 percent) of bank branches, no bank ATMs, and 5,136 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has two AAs in this rated area, both of which are metropolitan areas. Refer to Appendix A for a detailed listing of bank AAs.

The bank's operational strategy in the state of Florida is to serve its Private Client Group customers. Neither of the bank's two branches in the state are accessible to the general public, and its deposit shares are miniscule (less than a tenth of a percent in both AAs).

Scope of Evaluation in the State of Florida

We performed a full-scope review of the West Palm Beach AA, which consists of the entire West Palm Beach-Boca Raton-Delray Beach MD. The other AA received a limited-scope review.

The West Palm Beach AA is the bank's largest AA in this rated area based on deposits. It accounts for \$14 million (75 percent) of rated area deposits, one (50 percent) of rated area branches, and 3,681 (72 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 55 percent business loans and 45 percent home mortgage loans. The bank has an insufficient number of reported farm loans in this market for meaningful analysis.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the West Palm Beach AA.

LENDING TEST

Lending Test performance in the state of Florida is rated High Satisfactory. Bank performance in the full-scope West Palm Beach AA is good, and performance differences in the limited-scope AA did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (West Palm Beach AA)

Bank performance in the full-scope West Palm Beach AA is good based on an excellent level of lending activity, good overall geographic distributions, and adequate overall borrower distributions. The negative impact of CD lending is countered by the positive impact of flexible lending.

Lending Activity

Lending levels in the West Palm Beach AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked 52nd of 58 banks in area deposits as of June 30, 2015, with \$12 million deposits and less than 0.1 percent deposit market share.
- During the evaluation period, the bank reported \$449 million home mortgage, business, and farm loans in the AA.
- Of all loans reported in the West Palm Beach AA for the year 2015, the bank ranked 22nd in the number and dollar volume of home mortgage loans and 12th in the number of business loans (21st by dollar volume). The bank's lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the West Palm Beach AA is good, as evidenced by good distributions of home mortgage and business loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the West Palm Beach AA is good based on good home purchase and adequate home refinance distributions. Our assessment gives the most weight to home purchase loans as they account for 63 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is good overall.

- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise poor performance in moderate-income tracts to adequate. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but is still somewhat lower than) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise very poor performance in low-income tracts to poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but is still somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the West Palm Beach AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of reported business loans in moderate-income geographies is near its overall product share.
- Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of reported business loans in low-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the West Palm Beach AA is adequate, as evidenced by an adequate distribution of business loans and a poor distribution of home mortgage loans. Our assessment gives the most weight to business loans as they account for 55 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the West Palm Beach AA is poor based on poor home purchase and adequate home refinance distributions. Our assessment gives the most weight to home purchase loans as they account for 63 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is poor overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is very poor. The percentage of bank loans to moderate-income borrowers is significantly below the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is significantly below its overall product share.
- The borrower distribution of home refinance loans is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the West Palm Beach AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Community Development Lending

CD lending has a negative impact on lending performance in the West Palm Beach AA. The bank did not make any CD loans in this AA during the evaluation period, despite sufficient opportunity and bank capacity for CD lending. Our assessment does not consider statewide or regional CD loans with indirect benefit because the bank was not responsive to CD lending needs and opportunities in the West Palm Beach AA.

Statewide Product Flexibility

Product flexibility has a positive impact on lending performance in the West Palm Beach AA. The bank extensively uses flexible lending products to serve credit needs. The bank originated 5,552 loans (including 192 loans in the West Palm Beach AA) totaling \$1.0 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending is 456 times the allocated Tier 1 Capital for the state of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AA did not impact the Lending Test rating for the state of Florida. Lending performance is weaker/adequate in the Naples-Immokalee-Marco Island AA, representing 25 percent of rated area deposits. Weaker performance is attributable to less favorable borrower distributions.

INVESTMENT TEST

Investment Test performance in the state of Florida is rated Outstanding. Bank performance in the full-scope West Palm Beach Rock AA is excellent, and there was no performance difference in the limited-scope AA.

Conclusions for Areas Receiving Full-Scope Reviews (West Palm Beach AA)

Bank performance in the full-scope West Palm Beach AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with two investments totaling \$4.3 million during the evaluation period to two organizations. The bank also has two prior period investments with an aggregate outstanding balance of \$554 thousand. The dollar volume of investments represents 285.8 percent of allocated Tier 1 Capital for the West Palm Beach AA.

Investments are particularly responsive to revitalization/job creation needs. Almost all current period investments (\$4.1 million or 97 percent) have this community development purpose and consist of a \$4.1 million NMTC to remodel the office and infrastructure for a healthcare service company in a moderate-income area. The project is expected to create 300 full-time jobs, 260 of which will be available to LMI persons.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has one such investment (current period) totaling less than \$500. The dollar volume of this investment represents less than 1 percent of allocated Tier 1 Capital for the state of Florida.

Because the bank was responsive to community development investment needs and opportunities in the West Palm Beach AA, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 221 investments (current and prior period) totaling \$245.6 million and eight unfunded commitments totaling \$170 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) is 110 times the allocated Tier 1 Capital for the state of Florida.
- The bank also has 735 regional investments (current and prior period) totaling \$616 million, and 30 unfunded commitments totaling \$65 million, in the broader South Atlantic Division, which includes the state of Florida. The dollar volume of these regional investments (excluding unfunded commitments) is 275 times the allocated Tier 1 Capital for the state of Florida.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in the limited-scope area and consistent with the Outstanding Investment Test rating for the state of Florida.

SERVICE TEST

Service Test performance in the state of Florida is rated Low Satisfactory. Bank performance in the full-scope Palm Beach AA is adequate, and there were no performance differences in the limited-scope AA.

Conclusions for Areas Receiving Full-Scope Reviews (West Palm Beach AA)

Bank performance in the full-scope West Palm Beach AA is adequate based on reasonably accessible retail delivery systems.

Retail Banking Services

Retail delivery systems are reasonably accessible for the bank's operational strategy in the state of Florida, which is to serve its Private Client Group customers. The bank has one branch in this market, which is located in an upper-income tract and not accessible to the general public. There was no branching activity in this AA during the evaluation period.

Community Development Services

The bank did not provide any qualified CD service activities in the West Palm Beach AA. The absence of service activity is mitigated by the bank's operational strategy in this market, as well as its limited presence.

Conclusions for Areas Receiving Limited-Scope Reviews

Service performance is consistent/adequate in the Naples-Immokalee-Marco Island AA.

State of Idaho

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

The major factors that support this rating include:

- Good lending performance in the full-scope AA based on adequate borrower distributions, adequate geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise adequate lending performance to good. A good level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to an identified community development need for economic development/small business financing.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems (with emphasis on moderate-income areas), branching activity that has improved access, and excellent CD service performance, including services that are responsive to an identified community development need for financial education.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Idaho section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Idaho

The state of Idaho is the bank's 14th largest rated area based on deposits. It accounts for \$3.8 billion (1.4 percent) of bank deposits, 94 (3 percent) of bank branches, 128 (3 percent) of bank ATMs, and 35,064 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has nine AAs in this rated area, four of which are metropolitan areas. The five nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Idaho

We performed a full-scope review of the Boise AA, which includes four (of five) counties in the Boise City MSA. Other AAs received limited-scope reviews.

The Boise AA is the bank's largest AA in this rated area based on deposits. It accounts for \$2.1 billion (55 percent) of rated area deposits, 39 (41 percent) of rated area branches, 59 (46 percent) of rated area ATMs, and 16,376 (47 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 56 percent business loans, 41 percent home mortgage loans, and 3 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Boise AA.

LENDING TEST

Lending Test performance in the state of Idaho is rated High Satisfactory. Bank performance in the full-scope Boise AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Boise AA)

Bank performance in the full-scope Boise AA is good based on a good level of lending activity, adequate overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise adequate lending performance to good. A good level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Boise AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 20 banks in area deposits as of June 30, 2015, with \$2.1 billion deposits and a 22.8 percent deposit market share.
- During the evaluation period, the bank reported \$1.5 billion home mortgage, business, and farm loans in the AA. It also originated \$95 million in CD loans specific to the AA.
- Of all loans reported in the Boise AA for the year 2015, the bank ranked fifth in the number and dollar volume of home mortgage loans, second in the number and dollar volume of business loans, and first in the number of farm loans (third by dollar volume). While lending market shares are less than the bank's deposit market share, this is a competitive market with more than 300 home loan reporters and at least 67 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Boise AA is adequate, as evidenced by a good distribution of home mortgage loans, an adequate distribution of business loans, an excellent distribution of farm loans, and no lending gaps. Our assessment gives the most weight to business loans and home mortgage loans, as these products respectively account for 56 percent and 41 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Boise AA is good based on good home refinance, adequate home purchase, and adequate home improvement distributions. Our assessment gives the most weight to home refinance loans as they account for 61 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects a total of one home improvement loan in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but is still somewhat lower than) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Boise AA is adequate.

- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is lower than its overall product share.
- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Boise AA is excellent. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (15 farms). The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Boise AA is adequate, as evidenced by a good distribution of home mortgage loans, an adequate distribution of business loans, and a poor distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Boise AA is good based on good home refinance, good home improvement, and adequate home purchase distributions.

- The borrower distribution of home purchase loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Boise AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses is near its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Boise AA is poor. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is somewhat lower than its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Boise AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 33 CD loans totaling \$94.9 million during the evaluation period. By dollar volume, 72 percent of these loans fund revitalization projects, 19 percent provide affordable housing to LMI persons, and the remainder support community services for LMI persons. CD loans include a construction-to-permanent loan to replace vacant, underutilized real estate with a new medical office building, including space for additional tenants. The project, which is part of a larger plan to revitalize a moderate-income area and SBA-designated HUBZone, will retain eight existing jobs, create two new jobs, and encourage additional development. The dollar volume of CD lending represents 37 percent of allocated Tier 1 Capital for the Boise AA.

Statewide CD lending has a neutral impact on performance. The bank made five CD loans totaling \$5.4 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The dollar volume of statewide CD lending represents 1 percent of allocated Tier 1 Capital for the state of Idaho.

Statewide Product Flexibility

The bank uses flexible lending products to serve credit needs. The bank originated 1,549 loans totaling \$238.4 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 51 percent of allocated Tier 1 Capital for the state of Idaho.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Idaho. Lending performance is consistent/good in the Idaho Falls and nonmetropolitan AAs, collectively representing 37 percent of rated area deposits. Lending performance is stronger/excellent in the Coeur d'Alene and Pocatello AAs, collectively representing 8 percent of rated area deposits. Stronger performance is attributable to more favorable borrower and geographic distributions.

INVESTMENT TEST

Investment Test performance in the state of Idaho is rated Outstanding. Bank performance in the full-scope Boise AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Boise AA)

Bank performance in the full-scope Boise AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 34 investments totaling \$23.4 million during the evaluation period, plus another 96 qualifying grants totaling \$550 thousand to at least 42 organizations. The bank also has 89 prior period investments with an aggregate outstanding balance of \$14.6 million. The dollar volume of investments represents 15.1 percent of allocated Tier 1 Capital for the Boise AA.

Investments are particularly responsive to an identified community development need for economic development/small business financing. Most current period investments (\$15.3 million or 63.9 percent) serve this need and primarily consist of ten bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Boise AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 24 such investments (current and prior period) totaling \$802 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Idaho.

Because the bank was responsive to community development needs and opportunities in the Boise AA, broader statewide investments that provide only indirect benefit were considered and have a neutral impact on performance. Elsewhere in the state, the bank has one investment (current period) totaling \$3.9 million. The dollar volume of this broader statewide investment represents 1 percent of allocated Tier 1 Capital for the state of Idaho.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Idaho.

SERVICE TEST

Service Test performance in the state of Idaho is rated Outstanding. Bank performance in the full-scope Boise City AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Boise City AA)

Bank performance in the full-scope Boise City AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Boise City AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of low-income areas. The bank has no branches in low-income geographies and 17 branches in moderate-income geographies. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas.

Branching activity has improved access to banking services. The bank opened one branch in a moderate-income geography and one branch in an upper-income geography during the evaluation period. There were no branch closures. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Boise AA based on the bank's relative level of services provided, demonstrated leadership, and responsiveness to an identified community development need for financial education. The bank provided 122 qualified service activities involving 40 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 59 of those activities and nearly 1,300 related service hours. Service activities are most responsive to an identified need for financial education. Bank staff provided 63 financial education programs to more than 1,600 participants, including first-time homebuyers and youth. The bank also maintains three Individual Development Account program relationships with local nonprofit organizations.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Idaho. Service performance is consistent/excellent in the Idaho Falls and Pocatello AAs, collectively representing 6 percent of rated areas deposits. Service performance is weaker/good in the Coeur d'Alene and nonmetropolitan AAs, collectively representing 39 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Illinois

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, excellent geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to economic development/small business financing needs, and the additional support of regional investments.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems and excellent CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Illinois section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Illinois

The state of Illinois is the bank's 24th largest rated area based on deposits. It accounts for \$1.5 billion (<1 percent) of bank deposits, 35 (1 percent) of bank branches, 42 (1 percent) of bank ATMs, and 20,537 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 12 AAs in this rated area, four of which are metropolitan areas. The eight nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Illinois

We performed a full-scope review of the Springfield, IL AA, which includes one (of two) counties in the Springfield, IL MSA. Other AAs received limited-scope reviews.

The Springfield, IL AA is the bank's largest AA in this rated area based on deposits. It accounts for \$418 million (27 percent) of rated area deposits, four (11 percent) of rated area branches, nine (21 percent) of rated area ATMs, and 3,787 (18 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 56 percent home mortgage loans, 41 percent business loans, and 3 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Springfield, IL AA.

LENDING TEST

Lending Test performance in the state of Illinois is rated Outstanding. Bank performance in the full-scope Springfield, IL AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Springfield, IL AA)

Bank performance in the full-scope Springfield, IL AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Springfield, IL AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked sixth of 25 banks in area deposits as of June 30, 2015, with \$418 million deposits and an 8.3 percent deposit market share.
- During the evaluation period, the bank reported \$333 million home mortgage, business, and farm loans in the AA. It also originated \$5 million in CD loans specific to the AA.
- Of all loans reported in the Springfield, IL AA for the year 2015, the bank ranked fourth in the number of home mortgage loans (fifth by dollar volume), first in the number business loans (second by dollar volume), and second in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 210 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Springfield, IL AA is excellent, as evidenced by excellent distributions of home mortgage and business loans, an adequate distribution of farm loans, and no lending gaps. Our assessment gives the most weight to home mortgage and business loans, as these products respectively account for 56 percent and 41 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Springfield, IL AA is excellent based on excellent home purchase, excellent home improvement, and good home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies essentially equals or exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is lower than its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Springfield, IL AA is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Springfield, IL AA is adequate. Market analysis elevates otherwise very poor performance in both low- and moderate-income geographies to adequate. While the bank reported only one farm loan in low-income geographies during the evaluation period, there is limited opportunity for farm lending in both low- and moderate-income geographies (21 farms and 60 farms, respectively). The 2015 market share reports reflect a total of one farm loan in low-income geographies, and no farm loans in moderate-income geographies, by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Springfield, IL AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Springfield, IL AA is good based on good home purchase, good home refinance, and adequate home improvement distributions.

- The borrower distribution of home purchase loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Springfield, IL AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Springfield, IL AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Springfield, IL AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities with consideration of the more limited opportunities for CD lending in this market. The bank made 10 CD loans totaling \$5 million during the evaluation period. By dollar volume, 94 percent of these loans fund revitalization projects, and the remainder support community services for LMI persons. CD loans include a loan refinanced under a Residential Assistance Program that serves to rehabilitate and develop residential units in a designated TIF district. The subject building, which is located in a no-income census tract, is surrounded by a large grouping of LMI geographies. The dollar volume of CD lending represents 10 percent of allocated Tier 1 Capital for the Springfield, IL AA.

Statewide CD lending provides additional support for our assessment. The bank made four CD loans totaling \$44.0 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another five CD loans totaling \$11.4 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Springfield, IL AA. The combined volume of statewide CD lending represents 29 percent of allocated Tier 1 Capital for the state of Illinois.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 9,776 loans totaling \$1.4 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 731 percent of allocated Tier 1 Capital for the state of Illinois.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Illinois. Lending performance is consistent/excellent in the Bloomington and nonmetropolitan AAs, collectively representing 58 percent of rated area deposits. Lending performance is weaker/good in the Carbondale-Marion and Rockford AAs, collectively representing 15 percent of rated area deposits. Weaker performance is attributable to less favorable geographic distributions in both areas, as well as less favorable borrower distributions in the Rockford AA.

INVESTMENT TEST

Investment Test performance in the state of Illinois is rated Outstanding. Bank performance in the full-scope Springfield, IL AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Springfield, IL AA)

Bank performance in the full-scope Springfield, IL AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 12 investments totaling \$4.3 million during the evaluation period, plus another 25 qualifying grants and donations totaling \$124 thousand to at least 15 organizations. The bank also has 18 prior period investments with an aggregate outstanding balance of \$3.3 million. The dollar volume of investments represents 15.1 percent of allocated Tier 1 Capital for the Springfield, IL AA.

Investments are particularly responsive to economic development/small business financing needs. Almost all current period investments (\$4.2 million or 95 percent) have this community development purpose and consist of six bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Springfield, IL AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 16 such investments (current and prior period) totaling \$5.1 million. The dollar volume of these investments represents 2.7 percent of allocated Tier 1 Capital for the state of Illinois.

Because the bank was responsive to community development needs and opportunities in the Springfield, IL AA, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 76 investments (current and prior period) totaling \$57.4 million and one unfunded commitment totaling \$18 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 30.4 percent of allocated Tier 1 Capital for the state of Illinois.
- The bank also has 99 regional investments (current and prior period) totaling \$106.8 million, and four unfunded commitments totaling \$10.5 million, in the broader East North Central Division, which includes the states of Illinois, Indiana, Ohio, and Wisconsin. The dollar volume of these regional investments (excluding unfunded commitments) represents 1.8 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Chicago MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Illinois.

SERVICE TEST

Service Test performance in the state of Illinois is rated Outstanding. Bank performance in the full-scope Springfield, IL AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Springfield, IL AA)

Bank performance in the full-scope Springfield, IL AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Springfield, IL AA. Although the bank has a limited branch presence in this market, two (of its four) branches are in LMI geographies. The percentage of branches in low- and moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

Branching activity has not adversely affected LMI access to banking services. The bank closed one branch in a middle-income geography and one branch in an upper-income geography during the evaluation period. There were no branch openings. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Springfield, IL AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 22 qualified service activities involving nine different organizations during the evaluation period. Leadership is evident through Board or committee participation in 12 of those activities and nearly 200 related service hours. Most service activities address community service needs, including financial education. Bank staff provided ten financial education programs to more than 200 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Illinois. Service performance is consistent/excellent in the nonmetropolitan AAs, representing 50 percent of rated area deposits. Service performance is weaker/good in Carbondale-Marion and Rockford AAs, collectively representing 15 percent of rated area deposits. Service performance is weaker/adequate in the Bloomington AA, representing 8 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Indiana

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance based on good borrower distributions, good geographic distributions, an adequate level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance based on investment activity, responsiveness to economic development/small business financing needs, and the additional support of regional investments.
- Excellent service performance based on readily accessible retail delivery systems and excellent CD service performance.

Refer to Tables 1-15 in the State of Indiana section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Indiana

The state of Indiana is the bank's 36th largest rated area based on deposits. It accounts for \$280 million (<1 percent) of bank deposits, 12 (<1 percent) bank branches, 12 (<1 percent) bank ATMs, and 2,757 (<1 percent) bank-reported loans inside its AAs during the evaluation period. The bank has one nonmetropolitan AA in this rated area, which consists of three nonmetropolitan counties. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Indiana

We performed a full-scope review of the Eastern Indiana AA and rated the state of Indiana entirely on this assessment. The bank's mix of loans reported in this area (by number, excluding CD loans) is 60 percent business loans, 35 percent home mortgage loans, and 5 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Eastern Indiana AA.

LENDING TEST

Lending Test performance in the state of Indiana is rated Outstanding. Bank performance in the Eastern Indiana AA is excellent based on an adequate level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Eastern Indiana AA reflect adequate responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked third of 15 banks in area deposits as of June 30, 2015, with \$280 million deposits and a 12.0 percent deposit market share.
- During the evaluation period, the bank reported \$111 million home mortgage, business, and farm loans in the AA. It also originated \$315 thousand in CD loans specific to the AA.
- Of all loans reported in the Eastern Indiana AA for the year 2015, the bank ranked fourth in the number of home mortgage loans (fifth by dollar volume), first in the number of business loans (fourth by dollar volume), and fourth in the number and dollar volume of farm loans. While lending market shares are generally less than the bank's deposit market share, this is a competitive market with more than 135 home loan reporters and at least 42 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Eastern Indiana AA is good, as evidenced by an adequate distribution of home mortgage loans, an excellent distribution of business loans, a poor distribution of farm loans, and no lending gaps. Our assessment gives the most weight to business and home mortgage loans, as these products respectively account for 60 percent and 35 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Eastern Indiana AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is lower than its overall product share.
- The geographic distribution of home improvement loans is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.

- The geographic distribution of home refinance loans is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.

Small Loans to Businesses

The geographic distribution of reported business loans in the Eastern Indiana AA is excellent. The percentage of bank loans in moderate-income geographies equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies equals its overall product share.

Small Loans to Farms

The geographic distribution of reported farm loans in the Eastern Indiana AA is poor. Market analysis elevates otherwise very poor performance in moderate-income geographies to poor. While the bank reported only one farm loan in moderate-income geographies during the evaluation period, there is limited opportunity for farm lending (35 farms). The 2015 market share reports reflect a total of six farm loans in moderate-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Eastern Indiana AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Eastern Indiana AA is good based on adequate home purchase, excellent home improvement, and good home refinance distributions.

- The borrower distribution of home purchase loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is excellent. The percentage of bank loans to both low- and moderate-income borrowers essentially equals (or exceeds) the demographic comparator, and the bank's market share of home improvement loans to both low- and moderate-income borrowers is exceeds (or is near) its overall product share.

- The borrower distribution of home refinance loans is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Eastern Indiana AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is near the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Eastern Indiana AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Eastern Indiana AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities in the Eastern Indiana AA, with consideration of the more limited opportunities for CD lending in this market and the bank's level of broader statewide CD lending. The bank made five CD loans totaling \$315 thousand in the Eastern Indiana AA during the evaluation period, all of which provide affordable housing to LMI persons. CD loans include the financing of a residential facility in an underserved and distressed geography, which is used as a group home for LMI persons with cognitive and physical disabilities. The dollar volume of CD lending represents less than 1 percent of allocated Tier 1 Capital for the Eastern Indiana AA.

Statewide CD lending elevates otherwise adequate CD lending performance to excellent. The bank made two CD loans totaling \$7.5 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Eastern Indiana AA. The dollar volume of statewide CD lending represents 22 percent of allocated Tier 1 Capital for the state of Indiana.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 4,447 loans totaling \$558.7 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending is 16 times the allocated Tier 1 Capital for the state of Indiana.

INVESTMENT TEST

Investment Test performance in the state of Indiana is rated Outstanding. Bank performance in the Eastern Indiana AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with eight investments totaling \$2.0 million during the evaluation period, plus another 56 qualifying grants totaling \$91 thousand to at least 21 organizations. The bank also has 32 prior period investments with an aggregate outstanding balance of \$4.8 million. The dollar volume of investments represents 20.3 percent of allocated Tier 1 Capital for the Eastern Indiana AA.

Investments are particularly responsive to an identified need for economic development/small business financing. Most current period investments (\$1.5 million or 72.8 percent) have this community development purpose and consist of five bonds that provide funding for SBA guaranteed/ insured 504 Certified Development Loans to small businesses in the Eastern Indiana AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has one such investment (current period) totaling less than \$500. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Indiana.

Because the bank was responsive to community development needs and opportunities in the Eastern Indiana AA, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 182 investments (current and prior period) totaling \$94.3 million and two unfunded commitments totaling \$1.7 million. The dollar volume of these broader statewide investments (excluding unfunded commitments) is nearly three times the allocated Tier 1 Capital for the state of Indiana.
- The bank has 99 regional investments (current and prior period) totaling \$106.8 million, and four unfunded commitments totaling \$10.5 million, in the broader East North Central Division, which includes the states of Illinois, Indiana, Ohio, and Wisconsin. The dollar volume of these regional investments (excluding unfunded commitments) represents 1.8 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Chicago MMA.

SERVICE TEST

Service Test performance in the state of Indiana is rated Outstanding. Bank performance in the Eastern Indiana AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Eastern Indiana AA. The bank has four branches in moderate-income geographies. There are no low-income geographies in the AA. The distribution of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by a good ATM distribution in moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Eastern Indiana AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 81 qualified service activities involving 22 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 41 of those activities and nearly 500 related service hours. Service activities primarily address community service initiatives, including financial education. Bank staff provided 40 financial education programs to more than 600 participants.

State of Iowa

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, good geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to affordable housing needs.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems and excellent CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Iowa section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Iowa

The state of Iowa is the bank's 12th largest rated area based on deposits. It accounts for \$4.5 billion (1.6 percent) of bank deposits, 85 (3 percent) of bank branches, 159 (3 percent) of bank ATMs, and 52,119 (3 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 21 AAs in this rated area, seven of which are metropolitan areas. The 14 nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Iowa

We performed a full-scope review of the Cedar Rapids AA, which includes two (of three) counties in the Cedar Rapids MSA. Other AAs received limited-scope reviews.

The Cedar Rapids AA is the bank's 2nd largest AA in this rated area based on deposits. It accounts for \$887 million (20 percent) of rated area deposits, 10 (12 percent) of rated area branches, 16 (10 percent) of rated area ATMs, and 7,110 (14 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 58 percent home mortgage loans, 35 percent business loans, and 7 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Cedar Rapids AA.

LENDING TEST

Lending Test performance in the state of Iowa is rated Outstanding. Bank performance in the full-scope Cedar Rapids AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Cedar Rapids AA)

Bank performance in the full-scope Cedar Rapids AA is excellent based on a good level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Cedar Rapids AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked first of 37 banks in area deposits as of June 30, 2015, with \$887 million deposits and a 17.6 percent deposit market share.
- During the evaluation period, the bank reported \$788 million home mortgage, business, and farm loans in the AA. It also originated \$31 million in CD loans specific to the AA.
- Of all loans reported in the Cedar Rapids AA for the year 2015, the bank ranked seventh in the number and dollar volume of home mortgage loans, first in the number of business loans (second by dollar volume), and first in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 230 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Cedar Rapids AA is good, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of business and farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Cedar Rapids AA is adequate based on adequate home purchase, adequate home refinance, and good home improvement distributions.

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home improvement loans is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Cedar Rapids AA is excellent. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Cedar Rapids AA is excellent. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (one farm). The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Cedar Rapids AA is good, as evidenced by an excellent distribution of home mortgage loans, an adequate distribution of business loans, and a good distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Cedar Rapids AA is excellent based on excellent home refinance, good home purchase, and good home improvement distributions. Our assessment gives the most weight to home refinance loans as they account for 58 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
 - Performance in the low-income sector is excellent. The percentage of bank loans to low-income borrowers equals the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good. The percentage of bank loans to both low- and moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to both low- and moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is excellent overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Cedar Rapids AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Cedar Rapids AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is near the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Cedar Rapids AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made seven CD loans totaling \$30.7 million during the evaluation period. By dollar volume, 88 percent of these loans fund revitalization projects, and the remainder provide affordable housing to LMI persons. CD loans include a term loan for the expansion and renovation of a medical facility located in low-income area and SBA-designated HUBZone. The project serves to retain the tenant and 40 full-time jobs. The dollar volume of CD lending represents 28 percent of allocated Tier 1 Capital for the Cedar Rapids AA.

Statewide CD lending has a neutral impact on performance. The bank made 11 CD loans totaling \$9.7 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The dollar volume of statewide CD lending represents 2 percent of allocated Tier 1 Capital for the state of Iowa.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 6,433 loans totaling \$813.6 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 148 percent of allocated Tier 1 Capital for the state of Iowa.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Iowa. Lending performance is consistent/excellent in five limited-scope AAs, collectively representing 44 percent of rated area deposits (Ames, Des Moines-West Des Moines, Dubuque, Iowa City, and Sioux City AAs). Lending performance is weaker/good in the Waterloo-Cedar Falls and nonmetropolitan AAs, collectively representing 36 percent of rated area deposits. Weaker performance is attributable to less favorably CD lending in the nonmetropolitan AA, as well as less favorable borrower and geographic distributions in the Waterloo-Cedar Falls AA.

INVESTMENT TEST

Investment Test performance in the state of Iowa is rated Outstanding. Bank performance in the full-scope Cedar Rapids AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Cedar Rapids AA)

Bank performance in the full-scope Cedar Rapids AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 25 investments totaling \$15.5 million during the evaluation period, plus another 35 qualifying grants totaling \$298 thousand to at least 13 organizations. The bank also has 39 prior period investments with an aggregate outstanding balance of \$10.5 million. The dollar volume of investments represents 24.3 percent of allocated Tier 1 Capital for the Cedar Rapids AA.

Investments are particularly responsive to affordable housing needs. The largest share of current period investments (\$7.1 million or 45.3 percent) have this community development purpose, including 11 LIHTCs totaling \$6.7 million to construct a senior housing development with 60 units affordable to seniors earning 60 percent or less of the AMI.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 16 such investments (current and prior period) totaling \$90 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Iowa.

Because the bank was responsive to community development needs and opportunities in the Cedar Rapids AA, broader statewide investments that provide only indirect benefit were considered and have a neutral impact on performance. Elsewhere in the state, the bank has 11 investments (current and prior period) totaling \$11.9 million. The dollar volume of these broader statewide investments represents 2.2 percent of allocated Tier 1 Capital for the state of Iowa.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Iowa.

SERVICE TEST

Service Test performance in the state of Iowa is rated Outstanding. Bank performance in the full-scope Cedar Rapids AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Cedar Rapids AA)

Bank performance in the Cedar Rapids AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Cedar Rapids AA. The bank has one branch in the area's sole low-income geography and two branches in moderate-income geographies. The percentage of branches in low- and moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Cedar Rapids AA based on the bank's relative level of services provided and strong leadership. The bank provided 65 qualified service activities involving 26 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 40 of those activities and more than 1,000 related service hours. Most service activities address community service needs, including financial education. Bank staff provided 25 financial education programs to approximately 550 participants, including small businesses, senior citizens, and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Iowa. Service performance is consistent/excellent in the Des Moines-West Des Moines, Dubuque, Iowa City, Sioux City, and nonmetropolitan AAs, collectively representing 67 percent of rated area deposits. Service performance is weaker/good in Ames AA, representing 6 percent of rated area deposits. Service performance is weaker/adequate in the Waterloo-Cedar Falls AA, representing 7 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Kansas

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

The major factors that support this rating include:

- Good lending performance in the full-scope AA based on good borrower distributions, good geographic distributions, an adequate level of lending activity, and the positive impact of CD lending, which also supports good lending performance. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to economic development/small business financing needs, and the additional support of regional investments.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems and excellent CD service performance.
- Weaker service performance in the limited-scope AAs negatively impacts our assessment and results in an overall good service performance conclusion for the state. There were no other performance differences in the limited-scope AAs.

Refer to Tables 1-15 in the State of Kansas section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Kansas

The state of Kansas is the bank's 31st largest rated area based on deposits. It accounts for \$761 million (<1 percent) of bank deposits, 15 (<1 percent) of bank branches, 25 (1 percent) of bank ATMs, and 5,030 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has three AAs in this rated area, two of which are metropolitan areas. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Kansas

We performed a full-scope review of the Lawrence AA, which consists of the entire Lawrence MSA. Other AAs received limited-scope reviews.

The Lawrence AA is the bank's largest AA in this rated area based on deposits. It accounts for \$456 million (60 percent) of rated area deposits, five (33 percent) of rated area branches, 12 (48 percent) of rated area ATMs, and 2,168 (43 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 52 percent business loans, 47 percent home mortgage loans, and 1 percent farm loans. The bank has an insufficient number of reported farm loans in this market for meaningful analysis.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Lawrence AA.

LENDING TEST

Lending Test performance in the state of Kansas is rated High Satisfactory. Bank performance in the full-scope Lawrence AA is good, and performance in the limited-scope AAs is consistent.

Conclusions for Areas Receiving Full-Scope Reviews (Lawrence AA)

Bank performance in the full-scope Lawrence AA is good based on an adequate level of lending activity, good overall geographic distributions, good overall borrower distributions, and the positive impact of CD lending, which also supports good lending performance. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Lawrence AA reflect adequate responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked first of 23 banks in area deposits as of June 30, 2015, with \$456 million deposits and a 21.6 percent deposit market share.
- During the evaluation period, the bank reported \$205 million home mortgage, business, and farm loans in the AA. It also originated \$4 million in CD loans specific to the AA.
- Of all loans reported in the Lawrence AA for the year 2015, the bank ranked sixth in the number of home mortgage loans (fifth by dollar volume) and first in the number of business loans (third by dollar volume). While lending market shares are less than the bank's deposit market share, this is a competitive market with more than 205 home loan reporters and at least 44 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Lawrence AA is good, as evidenced by good distributions of home mortgage and business loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Lawrence AA is good based on excellent home purchase, excellent home improvement, and adequate home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.

- The geographic distribution of home improvement loans is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is significantly below its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Lawrence AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is somewhat lower than its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Lawrence AA is good, as evidenced by good distributions of home mortgage and business loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Lawrence AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good.

- Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home improvement loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers equals its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Lawrence AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Community Development Lending

CD lending has a positive impact on lending performance in the Lawrence AA. The bank demonstrated good responsiveness to CD lending needs and opportunities. The bank made nine CD loans totaling \$3.7 million during the evaluation period, all of which support community services for LMI persons. CD loans include a working capital line of credit to a nonprofit organization that focuses on providing behavioral and mental health services to LMI persons. The dollar volume of CD lending represents 7 percent of allocated Tier 1 Capital for the Lawrence AA.

Statewide CD lending provides additional support for our assessment. The bank made three CD loans totaling \$5.0 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The dollar volume of statewide CD lending represents 5 percent of allocated Tier 1 Capital for the state of Kansas.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 4,390 loans totaling \$625 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 673 percent of allocated Tier 1 Capital for the state of Kansas.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending test performance is consistent/good in both limited-scope AAs.

INVESTMENT TEST

Investment Test performance in the state of Kansas is rated Outstanding. Bank performance in the full-scope Lawrence AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Lawrence AA)

Bank performance in the full-scope Lawrence AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with eight investments totaling \$4.4 million during the evaluation period, plus another 19 qualifying grants totaling \$71 thousand to at least eight organizations. The bank also has 32 prior period investments with an aggregate outstanding balance of \$4.6 million. The dollar volume of investments represents 16.4 percent of allocated Tier 1 Capital for the Lawrence AA.

Investments are particularly responsive to economic development/small business financing needs. Almost all current period investments (\$4.4 million or 98.5 percent) have this community development purpose and primarily consist of eight bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Lawrence AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has one such investment (current period) totaling \$10 thousand. The dollar volume of this investment represents less than 1 percent of allocated Tier 1 Capital for the state of Kansas.

Because the bank was responsive to community development needs and opportunities in the Lawrence AA, broader statewide investments that provide only indirect benefit were considered and further support performance. Elsewhere in the state, the bank has 79 investments (current and prior period) totaling \$23.9 million and one unfunded commitment totaling \$25 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 25.7 percent of allocated Tier 1 Capital for the state of Kansas.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in both limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Kansas.

SERVICE TEST

Service Test performance in the state of Kansas is rated High Satisfactory. Bank performance in the full-scope Lawrence AA is excellent, but performance differences in limited-scope areas have negative impact and result in an overall good service performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Lawrence AA)

Bank performance in the Lawrence AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Lawrence AA. The bank has one branch in low-income geographies and one branch in a moderate-income geographies. The percentage of branches in low-income tracts exceeds, and in moderate-income tracts approximates, the percentage of the population respectively residing in each area. Access is further supported by overall good ATM distributions in LMI areas.

There was no branching activity in this AA during the evaluation period. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average nearly 50 hours per week for both LMI and MUI branches. All branches are traditional branches with drive-up facilities, and all branches are open Saturday.

Community Development Services

CD service performance is excellent in the Lawrence AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 38 qualified service activities involving 20 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 20 of those activities and nearly 300 related service hours. Most service activities address community service needs, including financial education. Bank staff provided 18 financial education programs to approximately 300 participants, including small businesses and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in limited scope AAs have negative impact and result in an overall good service performance conclusion and High Satisfactory Service Test rating for the state of Kansas. Service performance is weaker/adequate in the Topeka AA, representing 37 percent of rated area deposits. Service performance is weaker/good in the nonmetropolitan Pittsburg AA, representing 3 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Kentucky

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

The major factors that support this rating include:

- Good lending performance in the full-scope AA based on adequate borrower distributions, adequate geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise adequate lending performance to good. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to economic development/small business financing needs, and the additional support of regional investments.
- Good service performance in the full-scope AA based on accessible retail delivery systems (with emphasis on low-income areas), branching activity that has improved access, and excellent CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Kentucky section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Kentucky

The state of Kentucky is the bank's 19th largest rated area based on deposits. It accounts for \$2.4 billion (<1 percent) of bank deposits, 73 (2 percent) of bank branches, 105 (2 percent) of bank ATMs, and 26,032 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 13 AAs in this rated area, four of which are metropolitan areas. The nine nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Kentucky

We performed a full-scope review of the Bowling Green AA, which includes two (of four) counties in the Bowling Green MSA as of year-end 2015. Other AAs received limited-scope reviews.

The Bowling Green AA is the bank's 3rd largest AA in this rated area based on deposits. It accounts for \$383 million (16 percent) of rated area deposits, nine (12 percent) of rated area branches, 24 (23 percent) of rated area ATMs, and 3,919 (15 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 57 percent home mortgage loans, 41 percent business loans, and 2 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Bowling Green AA.

LENDING TEST

Lending Test performance in the state of Kentucky is rated High Satisfactory. Bank performance in the full-scope Bowling Green AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Bowling Green AA)

Bank performance in the full-scope Bowling Green AA is good based on a good level of lending activity, adequate overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise adequate lending performance to good. An excellent level of flexible lending in the state also supports lending performance.

Lending Activity

Lending levels in the Bowling Green AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked first of 20 banks in area deposits as of June 30, 2015, with \$383 million deposits and a 17.1 percent deposit market share.
- During the evaluation period, the bank reported \$437 million home mortgage, business, and farm loans in the AA. It also originated \$18 million in CD loans specific to the AA.
- Of all loans reported in the Bowling Green AA for the year 2015, the bank ranked first in the number and dollar volume of home mortgage loans, first in the number of business loans (third by dollar volume), and third in the number of farm loans (second by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 175 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Bowling Green AA is adequate, as evidenced by a poor distribution of home mortgage loans, a good distribution of business loans, and adequate distribution of farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Bowling Green AA is poor based on adequate home purchase, poor home improvement, and very poor home refinance distributions.

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home mortgage loans.
 - The geographic distribution of home purchase loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in low-income geographies as they contain more owner-occupied housing units as of year-end 2013.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - The geographic distribution of home purchase loans in the 2014-2015 period is very poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units as of year-end 2015.
 - Performance in moderate-income tracts is very poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is lower than its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home improvement loans is poor.
 - The geographic distribution of home improvement loans in the 2012-2013 period is poor overall.
 - Performance in low-income tracts is very poor. The bank reported no home improvement loans in low-income geographies during the 2012-2013 period. The 2013 market share report reflects a total of ten home improvement loans in low-income geographies by other lenders.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units as of year-end 2015.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is significantly below its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is very poor.

- The geographic distribution of home refinance loans in the 2012-2013 period is very poor overall. Our assessment gives more weight to performance in low-income geographies as they contain more owner-occupied housing units as of year-end 2013.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans in the 2014-2015 period is very poor. The percentage of bank loans in both low- and moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in both low- and moderate-income geographies is significantly below its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Bowling Green AA is good based on good distributions in both the 2012-2013 and 2014-2015 periods.

- The geographic distribution of reported business loans in the 2012-2013 period is good.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is lower than its overall product share.
- The geographic distribution of reported business loans in the 2014-2015 period is good. Our assessment gives more weight to performance in low-income geographies as they contain more businesses.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Bowling Green AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Market analysis elevates otherwise very poor performance in moderate-income geographies to poor. While the bank reported only one farm loan in moderate-income geographies during the evaluation period, there is limited opportunity for farm lending (35 farms). The 2015 market share report reflects a total of nine farm loans, in moderate-income geographies by other reporting lenders.
- Performance in low-income geographies is excellent. The bank reported two farm loans in low-income geographies during the evaluation period despite limited lending opportunity (10 farms). The 2015 market share report reflects no farm loans in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Bowling Green AA is adequate, as evidenced by adequate distributions of home mortgage and farm loans, and a good distribution of business loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Bowling Green AA is adequate based on adequate home refinance, good home purchase, and good home improvement distributions. Our assessment gives the most weight to home refinance loans as they account for 52 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported home purchase loans.
 - The borrower distribution of home purchase loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home purchase loans in the 2012-2013 period is excellent. The percentage of bank loans to both low- and moderate-income borrowers essentially equals (or exceeds) the demographic comparator, and the bank's market share of home purchase loans to both low- and moderate-income borrowers exceeds (or is near) its overall product share.

- The borrower distribution of home improvement loans is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home refinance loans.
 - The borrower distribution of home refinance loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home refinance loans in the 2014-2015 period is good overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Bowling Green AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Bowling Green AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Bowling Green AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made four CD loans totaling \$18.4 million during the evaluation period, all of which fund revitalization projects. CD loans include financing to construct and restore a former junior high school located in a moderate-income geography, SBA-designated HUBZone, State Enterprise zone, and TIF area. The project is part of a larger redevelopment plan to develop student housing, create jobs, and revitalize a distressed area. This level of CD represents 85 percent of allocated Tier 1 Capital for the Bowling Green AA.

CD lending at the statewide and regional level has a neutral impact on performance. The bank made one CD loan totaling \$812 thousand in a broader statewide area and one CD loan totaling \$6.6 million in the East South Central Division, which includes the states of Alabama, Kentucky, Mississippi, and Tennessee. Broader statewide and regional lending provide indirect benefit, but are considered because the bank is responsive to CD needs and opportunities in the Bowling Green AA. The dollar volume of statewide CD lending represents less than 1 percent of the allocated Tier 1 Capital for the state of Kentucky, and The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of Kentucky and Tennessee, as well as the multistate metropolitan areas of Cincinnati, Clarksville, and Louisville.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 5,628 loans totaling \$746.5 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 250 percent of allocated Tier 1 Capital for the state of Kentucky.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Kentucky. Lending performance is consistent/good in the Evansville, Lexington-Fayette, and nonmetropolitan AAs, collectively representing 44 percent of rated area deposits. Lending performance is stronger/excellent in the Owensboro AA, representing 21 percent of rated area deposits. Stronger performance is attributable to more favorable geographic distributions.

INVESTMENT TEST

Investment Test performance in the state of Kentucky is rated Outstanding. Bank performance in the full-scope Bowling Green AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Bowling Green AA)

Bank performance in the full-scope Bowling Green AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 18 investments totaling \$2.5 million during the evaluation period, plus another 24 qualifying grants totaling \$143 thousand to at least six organizations. At year-end 2015, the bank also has 15 prior period investments with an aggregate outstanding balance of \$2.5 million. The dollar volume of investments represents 11.4 percent of allocated Tier 1 Capital for the Bowling Green AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$2 million or 74.6 percent) have this community development purpose and consist of four bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Bowling Green AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has five such investments (current period) totaling \$85 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Kentucky.

Because the bank was responsive to community development needs and opportunities in the Bowling Green AA, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 125 investments (current and prior period) totaling \$14.6 million and one unfunded commitment totaling \$8 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 4.9 percent of allocated Tier 1 Capital for the state of Kentucky.
- The bank also has 104 regional investments (current and prior period) totaling \$197.8 million, and eight unfunded commitments totaling \$11.8 million, in the East South Central Division, which includes the states of Kentucky and Tennessee. The dollar volume of these regional investments (excluding unfunded commitments) represents 31.1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Clarksville MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Kentucky.

SERVICE TEST

Service Test performance in the state of Kentucky is rated High Satisfactory. Bank performance in the full-scope Bowling Green AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Bowling Green AA)

Bank performance in the Bowling Green AA is good based on accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Bowling Green AA. Our assessment weights performance in low-income areas more heavily, which are two to three times as populated. The bank has two branches in low-income geographies and no branches in moderate-income geographies. The percentage of branches in low-income tracts exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in low-income areas, as well as the availability and demonstrated usage of interactive voice response and ATMs by customers residing in LMI areas.

Branching activity improved access to banking services. The bank opened one branch in a low-income geography during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Bowling Green AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 66 qualified service activities involving 15 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 51 of those activities and more than 1,000 related service hours. Most service activities address community service needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Kentucky. Service performance is consistent/good in the Lexington-Fayette AA, representing 6 percent of rated area deposits. Service performance is stronger/excellent in the nonmetropolitan AAs, representing 58 percent of rated area deposits. Service performance is weaker/adequate in the Evansville and Owensboro AAs, collectively representing 21 percent of rated area deposits. Stronger (or weaker) performance is attributable to more (or less) accessible retail delivery systems.

State of Minnesota

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

The major factors that support this rating include:

- Good lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, a good level of lending activity, and the positive impact of CD lending, which also supports good lending performance. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to economic development/small business financing needs, and the additional support of regional investments.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems and good CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Minnesota section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Minnesota

The state of Minnesota is the bank's 20th largest rated area based on deposits. It accounts for \$2.4 billion (<1 percent) of bank deposits, 38 (1 percent) of bank branches, 125 (3 percent) of bank ATMs, and 35,864 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 11 AAs in this rated area, four of which are metropolitan areas. The seven nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Minnesota

We performed a full-scope review of the Duluth AA, which includes two (of three) counties in the Duluth MSA. Other AAs received limited-scope reviews.

The Duluth AA is the bank's largest AA in this rated area based on deposits. It accounts for \$606 million (25 percent) of rated area deposits, 10 (26 percent) of rated area branches, 37 (30 percent) of rated area ATMs, and 7,622 (21 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 51 percent home mortgage loans, 48 percent business loans, and 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Duluth AA.

LENDING TEST

Lending Test performance in the state of Minnesota is rated High Satisfactory. Bank performance in the full-scope Duluth AA is good, and performance in the limited-scope AAs is consistent.

Conclusions for Areas Receiving Full-Scope Reviews (Duluth AA)

Bank performance in the full-scope Duluth AA is good based on a good level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the positive impact of CD lending, which further supports good lending performance. An excellent level of flexible lending in the state also supports lending performance.

Lending Activity

Lending levels in the Duluth AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 25 banks in area deposits as of June 30, 2015, with \$606 million deposits and a 16.8 percent deposit market share.
- During the evaluation period, the bank reported \$628 million home mortgage, business, and farm loans in the AA. It also originated \$5 million in CD loans specific to the AA.
- Of all loans reported in the Duluth AA for the year 2015, the bank ranked second in the number and dollar volume of home mortgage loans, first in the number of business loans (third by dollar volume), and first in the number of farm loans (fifth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with 260 home loan reporters. The bank's lending market shares for other products (by number of loans) exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Duluth AA is good, as evidenced by good distributions of home mortgage and farm loans, an excellent distribution of business loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Duluth AA is good based on good home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share.

- Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Duluth AA is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Duluth AA is good.

- Performance in low-income tracts is excellent. The bank reported two farm loans in low-income geographies during the evaluation period, despite limited lending opportunity (20 farms). The 2015 market share report reflects no farm loans in low-income geographies by other reporting lenders.
- Context and market analysis elevate otherwise very poor performance in moderate-income tracts to adequate. While the bank reported only one farm loan in moderate-income geographies during the evaluation period, farm lending opportunities are limited (40 farms). The 2015 market share report reflects a total of one farm loan in moderate-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Duluth AA is adequate, as evidenced by adequate distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Duluth AA is adequate based on adequate home refinance, adequate home improvement, and good home purchase distributions.

- The borrower distribution of home purchase loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home refinance loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Duluth AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Duluth AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a positive impact on lending performance in the Duluth AA. The bank demonstrated good responsiveness to CD lending needs and opportunities, with consideration of the bank's level of broader statewide CD lending. The bank made four CD loans totaling \$4.5 million during the evaluation period. By dollar volume, 49 percent of these loans support community services for LMI persons, 40 percent provide affordable housing to LMI persons (50 units created or rehabilitated), and the remainder promote economic development. CD loans include a bridge loan for the renovation of a LIHTC multi-family housing project, with all 45 units affordable through a Section 8 subsidy. The dollar volume of CD lending represents 6 percent of allocated Tier 1 Capital for the Duluth AA.

Statewide CD lending elevates otherwise adequate CD lending performance to good. The bank made four CD loans totaling \$9.1 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another five CD loans totaling \$2.0 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Duluth AA. The combined volume of statewide CD lending represents 4 percent of allocated Tier 1 Capital for the state of Minnesota.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 11,636 loans totaling \$2.0 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 670 percent of allocated Tier 1 Capital for the state of Minnesota.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending test performance is consistent/good in the limited-scope AAs.

INVESTMENT TEST

Investment Test performance in the state of Minnesota is rated Outstanding. Bank performance in the full-scope Duluth AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Duluth AA)

Bank performance in the full-scope Duluth AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 31 investments totaling \$7.4 million during the evaluation period, plus another 90 qualifying grants and donations totaling \$280 thousand to at least 32 organizations. The bank also has 10 prior period investments with an aggregate outstanding balance of \$3.1 million and one unfunded commitment totaling less than \$500. The dollar volume of investments (excluding unfunded commitments) represents 14.5 percent of allocated Tier 1 Capital for the Duluth AA.

Investments are particularly responsive to a community development purpose of economic development/small business financing. Most current period investments (\$4.1 million or 54.2 percent) serve this need and primarily consist of six bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Duluth AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 20 such investments (current and prior period) totaling \$4 million. The dollar volume of these investments represents 1.3 percent of allocated Tier 1 Capital for the state of Minnesota.

Because the bank was responsive to community development needs and opportunities in the Duluth AA, broader statewide investments that provide only indirect benefit were considered and further support performance. Elsewhere in the state, the bank has 26 investments (current and prior period) totaling \$54.2 million and one unfunded commitment totaling \$40 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 18.3 percent of allocated Tier 1 Capital for the state of Minnesota.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Minnesota.

SERVICE TEST

Service Test performance in the state of Minnesota is rated Outstanding. Bank performance in the full-scope Duluth AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Duluth AA)

Bank performance in the Duluth AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Duluth AA. The bank has two branches in low-income geographies and two branches in moderate-income geographies. The percentage of branches in both low- and in moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by overall good ATM distributions in LMI areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Duluth AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 48 qualified service activities involving 17 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 24 of those activities and approximately 280 related service hours. Service activities address affordable housing, community service, and financial education needs. Bank staff provided 24 financial education programs to more than 300 participants, including first-time homebuyers and small businesses.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Minnesota. Service performance is consistent/excellent in the St. Cloud and nonmetropolitan AAs, collectively representing 49 percent of rated area deposits. Service performance is weaker/adequate in the Mankato-North Mankato and Rochester AAs, collectively representing 26 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Missouri

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance. Weaker lending performance in limited-scope areas negatively impacts our assessment and results in an overall good lending performance conclusion for the state.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to economic development/small business financing needs. Investment performance differences in the limited-scope areas did not affect the state rating.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems (with emphasis on moderate-income areas) and good CD service performance. Service performance differences in the limited-scope areas did not affect the state rating.

Refer to Tables 1-15 in the State of Missouri section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Missouri

The state of Missouri is the bank's 15th largest rated area based on deposits. It accounts for \$3.1 billion (1.1 percent) of bank deposits, 105 (3 percent) of bank branches, 119 (2 percent) of bank ATMs, and 39,122 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 19 AAs in this rated area, seven of which are metropolitan areas. The 12 nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Missouri

We performed a full-scope review of the Springfield, MO AA, which consists of the entire Springfield, MO MSA. Other AAs received limited-scope reviews.

The Springfield, MO AA is the bank's largest AA in this rated area based on deposits. It accounts for \$341 million (11 percent) of rated area deposits, 13 (12 percent) of rated area branches, 14 (12 percent) of rated area ATMs, and 8,524 (22 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 58 percent home mortgage loans, 40 percent business loans, and 2 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Springfield, MO AA.

LENDING TEST

Lending Test performance in the state of Missouri is rated High Satisfactory. Bank performance in the full-scope Springfield, MO AA is excellent, but weaker performance in limited-scope areas has negative impact and results in an overall good lending performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Springfield, MO AA)

Bank performance in the full-scope Springfield, MO AA is excellent based on an excellent level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Springfield, MO AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked seventh of 39 banks in area deposits as of June 30, 2015, with \$341 million deposits and a 3.9 percent deposit market share.
- During the evaluation period, the bank reported \$768 million home mortgage, business, and farm loans in the AA. It also originated \$2 million in CD loans specific to the AA.
- Of all loans reported in the Springfield, MO AA for the year 2015, the bank ranked second in the number of home mortgage loans (third by dollar volume), first in the number of business loans (eighth by dollar volume), and fourth in the number and dollar volume of farm loans. The bank's lending market shares generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Springfield, MO AA is good, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of business and farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Springfield, MO AA is adequate based on good home purchase, adequate home improvement, and poor home refinance distributions.

- The geographic distribution of home purchase loans is good overall.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is near its overall product share.
- The geographic distribution of home improvement loans is adequate overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is lower than its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Springfield, MO AA is excellent. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is excellent. The percentage of bank loans moderate-income geographies exceeds the demographic comparator, and the bank's market share of reported business loans in moderate-income geographies is near its overall product share.

- Performance in low-income tracts is good. The percentage of bank loans low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of reported business loans in low-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Springfield, MO AA is excellent. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (three farms). The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is near its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Springfield, MO AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Springfield, MO AA is good based on good home purchase, good home refinance, and adequate home improvement distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.

- Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Springfield, MO AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Springfield, MO AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Springfield, MO AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities, with consideration of the more limited opportunities for CD lending in this market and the bank's level of broader statewide CD lending. The bank made one CD loan totaling \$2.4 million during the evaluation period. Proceeds were used for the construction of a new apartment building in arrangement with the Missouri Housing Development Commission, which provided 48 affordable housing units to LMI persons. The dollar volume of CD lending represents 6 percent of allocated Tier 1 Capital for the Springfield, MO AA.

Statewide CD lending elevates otherwise adequate CD lending performance to excellent. The bank made six CD loans totaling \$129.3 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another CD loan totaling \$7.0 million with indirect benefit in a broader statewide area, which is considered because the bank is responsive to CD needs and opportunities in the Springfield, MO AA. The combined volume of statewide CD lending represents 37 percent of allocated Tier 1 Capital for the state of Missouri.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 10,294 loans totaling \$1.4 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 368 percent of allocated Tier 1 Capital for the state of Missouri.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did negatively impact our assessment and result in an overall good lending performance conclusion and High Satisfactory Lending Test rating for the state of Missouri. Lending performance is weaker/good in the Columbia and nonmetropolitan AAs, collectively representing 61 percent of rated area deposits. Lending performance is weaker/adequate in the Fayetteville-Springdale-Rogers AA, representing 1 percent of rated area deposits. Weaker performance is attributable to less favorable geographic distributions (Fayetteville-Springdale-Rogers and nonmetropolitan AAs) and less favorable borrower distributions (2014-2015 Columbia and 2012-2013 nonmetropolitan AAs). Lending performance in the remaining four limited-scope AAs (Cape Girardeau, Jefferson City, Joplin, and St. Joseph AAs), collectively representing 27 percent of rated area deposits, is consistent/excellent with performance in the full-scope Springfield, MO AA.

INVESTMENT TEST

Investment Test performance in the state of Missouri is rated Outstanding. Bank performance in the full-scope Springfield, MO AA is excellent, and performance differences in one limited-scope AA did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Springfield, MO AA)

Bank performance in the full-scope Springfield, MO AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 12 investments totaling \$3.6 million during the evaluation period, plus another 98 qualifying grants totaling \$185 thousand to at least 32 organizations. The bank also has 15 prior period investments with an aggregate outstanding balance of \$2.0 million. The dollar volume of investments represents 14.0 percent of allocated Tier 1 Capital for the Springfield, MO AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$3.5 million or 92 percent) have this community development purpose and primarily consist of eight bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Springfield, MO AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 26 such investments (current and prior period) totaling \$3.6 million. The dollar volume of these investments represents 1 percent of allocated Tier 1 Capital for the state of Missouri.

Because the bank was responsive to community development needs and opportunities in the Springfield, MO AA, broader statewide investments that provide only indirect benefit were considered and have a neutral impact on performance. Elsewhere in the state, the bank has 22 investments (current and prior period) totaling \$6.7 million and one unfunded commitment totaling \$17 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 1.8 percent of allocated Tier 1 Capital for the state of Missouri.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Missouri, with one exception. Performance is weaker/good in the Fayetteville-Springdale-Rogers AA, representing 1 percent of rated area deposits. Weaker performance is attributable to a lower relative investment volume. This performance difference did not impact the Investment Test rating for the state of Missouri.

SERVICE TEST

Service Test performance in the state of Missouri is rated Outstanding. Bank performance in the full-scope Springfield, MO AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Springfield, MO AA)

Bank performance in the Springfield, MO AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Springfield, MO AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of low-income areas. The bank has no branches in low-income geographies and five branches in moderate-income geographies. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by excellent ATM distribution in moderate-income areas, as well as the availability and demonstrated usage of mobile banking, the interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Springfield, MO AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 52 qualified service activities involving 23 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 21 of those activities and approximately 500 related service hours. Most service activities address community service and economic development needs. Bank staff provided 31 financial education programs to more than 500 participants, including small businesses and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Missouri. Service performance is consistent/excellent in the Columbia, Joplin, St. Joseph, and nonmetropolitan AAs, collectively representing 80 percent of rated area deposits. Service performance is weaker/good in the Cape Girardeau and Jefferson City AAs, collectively representing 8 percent of rated area deposits. Service performance is weaker/adequate in the Fayetteville-Springdale-Rogers AA, representing 1 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Montana

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

The major factors that support this rating include:

- Adequate lending performance in the full-scope AA based on good borrower distributions, adequate geographic distributions, an adequate level of lending activity, and an adequate level of CD lending. Stronger lending performance in limited-scope AAs positively impacts our assessment and results in an overall good lending performance conclusion for the state. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to economic development/small business financing needs, and the additional support of regional investments. There were no investment performance differences in the limited-scope AAs.
- Adequate service performance in the full-scope AA based on reasonably accessible retail delivery systems (with consideration for the bank's limited number of branches in this market, ATM distributions, and ADS usage) and excellent CD service performance. Stronger performance in limited-scope AAs positively impacts our assessment and results in an overall good service performance conclusion for the state.

Refer to Tables 1-15 in the State of Montana section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the Montana

The state of Montana is the bank's 21st largest rated area based on deposits. It accounts for \$2.2 billion (<1 percent) of bank deposits, 24 (1 percent) of bank branches, 60 (1 percent) of bank ATMs, and 16,259 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 10 AAs in this rated area, three of which are metropolitan areas. The seven nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Montana

We performed a full-scope review of the Billings AA, which includes one (of three) counties in the Billings MSA. Other AAs received limited-scope reviews.

The Billings AA is the bank's largest AA in this rated area based on deposits. It accounts for \$1.0 billion (47 percent) of rated area deposits, four (17 percent) of rated area branches, 18 (30 percent) of rated area ATMs, and 3,802 (23 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 51 percent home mortgage loans, 48 percent business loans, and 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Billings AA.

LENDING TEST

Lending Test performance in the state of Montana is rated High Satisfactory. Bank performance in the full-scope Billings AA is adequate, but stronger performance in the limited-scope areas has positive impact and results in an overall good lending performance assessment for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Billings AA)

Bank performance in the full-scope Billings AA is adequate based on an adequate level of lending activity, adequate overall geographic distributions, good overall borrower distributions, and an adequate level of CD lending. An excellent level of flexible lending in the state also supports lending performance.

Lending Activity

Lending levels in the Billings AA reflect adequate responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 12 banks in area deposits as of June 30, 2015, with \$1.0 billion deposits and a 22.6 percent deposit market share.
- During the evaluation period, the bank reported \$436 million home mortgage, business, and farm loans in the AA. It also originated \$1 million in CD loans specific to the AA.
- Of all loans reported in the Billings AA for the year 2015, the bank ranked seventh in the number and dollar volume of home mortgage loans, third in the number of business loans (fourth by dollar volume), and sixth in the number of farm loans (fifth by dollar volume). While lending market shares are less than the bank's deposit market share, this is a competitive market with more than 140 home loan reporters and at least 41 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Billings AA is adequate, as evidenced by an adequate distribution of home mortgage loans, good distributions of business and farm loans, and no lending gaps. Our assessment gives the most weight to home mortgage loans as they account for the largest share of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Billings AA is adequate based on adequate home purchase, very poor home improvement, and good home refinance distributions.

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home improvement loans is very poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is significantly below its overall product share. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects a total of five home improvement loans in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is somewhat lower than its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Billings AA is adequate.

- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is significantly below its overall product share.
- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Billings AA is adequate. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (eight farms). While the bank reported only two farm loans in moderate-income geographies during the evaluation period, there is limited opportunity for farm lending (42 farms). The 2015 market share reports reflects a total of three farm loans in moderate-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Billings AA is good, as evidenced by a good distribution of home mortgage loans, and adequate distributions of business and farm loans. Our assessment gives the most weight to home mortgage loans as they account for 51 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Billings AA is good based on good home refinance, adequate home purchase, and adequate home improvement distributions. Our assessment gives the most weight to home refinance loans as they account for 57 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers equals its overall product share.
- The borrower distribution of home improvement loans is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is significantly below its overall product share.
- The borrower distribution of home refinance loans is good.

- Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Billings AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses is near its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Billings AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a neutral impact on lending performance in the Billings AA. The bank demonstrated adequate responsiveness to CD lending needs and opportunities, with consideration of the limited opportunities for CD lending in this market. The bank made three CD loans totaling \$1.1 million during the evaluation period. By dollar volume, 46 percent of these loans provide affordable housing to LMI persons, 42 percent promote economic development, and the remainder support community services for LMI persons. CD loans include a participation with a local bank consortium that provides financing for economic development projects in the downtown area. The dollar volume of CD lending represents 1 percent of allocated Tier 1 Capital for the Billings AA.

Statewide CD lending provides additional support for our assessment. The bank made four CD loans totaling \$1.7 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another two CD loans totaling \$7.4 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Billings AA. The combined volume of statewide CD lending represents 3 percent of allocated Tier 1 Capital for the state of Montana.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 1,513 loans totaling \$275.7 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 105 percent of allocated Tier 1 Capital for the state of Montana.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did positively impact our assessment and result in a High Satisfactory Lending Test rating for the state of Montana. Lending performance is stronger/excellent in the Great Falls AA, representing 14 percent of rated area deposits. Lending performance is stronger/good in the Missoula and nonmetropolitan AAs, representing 39 percent of rated area deposits. Stronger performance is attributable to more favorable geographic distributions, as well as more favorable CD lending (Great Falls and nonmetropolitan AAs).

INVESTMENT TEST

Investment Test performance in the state of Montana is rated Outstanding. Bank performance in the full-scope Billings AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Billings AA)

Bank performance in the full-scope Billings AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 22 investments totaling \$13.5 million during the evaluation period, plus another 27 qualifying grants totaling \$109 thousand to 12 organizations. The bank also has 35 prior period investments with an aggregate outstanding balance of \$7.4 million. The dollar volume of investments represents 17.1 percent of allocated Tier 1 Capital for the Billings AA.

Investments are particularly responsive to economic development/small business financing needs. Almost all current period investments (\$13.3 million or 97.7 percent) have this community development purpose and primarily consist of nine bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Billings AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has three such investments (current period) totaling \$6 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Montana.

Because the bank was responsive to community development needs and opportunities in the Billings AA, broader statewide investments that provide only indirect benefit were considered and further support performance. Elsewhere in the state, the bank has nine investments (current and prior period) totaling \$24.3 million and one unfunded commitment totaling \$1 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 9.2 percent of allocated Tier 1 Capital for the state of Montana.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Montana.

SERVICE TEST

Service Test performance in the state of Montana is rated High Satisfactory. Bank performance in the full-scope Billings AA is adequate, but performance differences in limited-scope areas have positive impact and result in an overall good service performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Billings AA)

Bank performance in the Billings AA is adequate based on reasonably accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the Billings AA. Our assessment recognizes the bank's limited branch presence in this market and positively considers ATM distributions and ADS usage. The bank has four branches in the AA, none of which are located in low- or moderate-income geographies. There is only one low-income geography in the AA, which is sparsely populated. Access is expanded by an excellent ATM distribution in moderate-income areas, as well as the availability and demonstrated usage of interactive voice response and ATMs by customers residing in LMI areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Billings AA based on the bank's relative level of services provided and strong leadership. The bank provided 22 qualified service activities involving six different organizations during the evaluation period. Strong leadership is evident as all activities involved Board or committee participation and more than 1,500 related service hours. Service activities primarily address community service needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in limited scope AAs have positive impact and result in an overall good service performance conclusion and High Satisfactory Service Test rating for the state of Montana. Service performance is stronger/excellent in the Great Falls and nonmetropolitan AAs, collectively representing 43 percent of rated area deposits. Service performance is stronger/good in the Missoula AA, representing 10 percent of rated area deposits. Stronger performance is attributable to more accessible retail delivery systems.

State of Nebraska

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on excellent borrower distributions, excellent geographic distributions, and a good level of lending activity. The significantly positive impact of CD lending and an excellent level of flexible lending in the state further support lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to an identified community development need for revitalization/job creation, and the additional support of regional investments.
- Good service performance in the full-scope AA based on accessible retail delivery systems (with emphasis on moderate-income areas) and excellent CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Nebraska section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Nebraska

The state of Nebraska is the bank's 26th largest rated area based on deposits. It accounts for \$1.3 billion (<1 percent) of bank deposits, 28 (1 percent) of bank branches, 33 (1 percent) of bank ATMs, and 15,613 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has seven AAs in this rated area, two of which are metropolitan areas. The five nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Nebraska

We performed a full-scope review of the Lincoln AA, which includes one (of two) counties in the Lincoln MSA. Other AAs received limited-scope reviews.

The Lincoln AA is the bank's largest AA in this rated area based on deposits. It accounts for \$867 million (66 percent) of rated area deposits, 13 (46 percent) of rated area branches, 15 (45 percent) of rated area ATMs, and 7,920 (51 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 58 percent home mortgage loans, 41 percent business loans, and less than 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Lincoln AA.

LENDING TEST

Lending Test performance in the state of Nebraska is rated Outstanding. Bank performance in the full-scope Lincoln AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Lincoln AA)

Bank performance in the full-scope Lincoln AA is excellent based on a good level of lending activity, excellent overall geographic distributions, excellent overall borrower distributions, and the significantly positive impact of CD lending, which further supports excellent lending performance. An excellent level of flexible lending in the state also supports lending performance.

Lending Activity

Lending levels in the Lincoln AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked third of 24 banks in area deposits as of June 30, 2015, with \$867 million deposits and a 12.7 percent deposit market share.
- During the evaluation period, the bank reported \$664 million home mortgage, business, and farm loans in the AA. It also originated \$64 million in CD loans specific to the AA.
- Of all loans reported in the Lincoln AA for the year 2015, the bank ranked fourth in the number of home mortgage loans (fifth by dollar volume), first in the number of business loans (fourth by dollar volume), and fifth in the number of farm loans (ninth by dollar volume). While lending market shares are generally less than the bank's deposit market share, this is a competitive market with more than 235 home loan reporters and at least 54 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Lincoln AA is excellent, as evidenced by excellent distributions of home mortgage and business loans, a poor distribution of farm loans, and no unexplained lending gaps. Our assessment gives the most weight to home mortgage and business loans, as these products respectively account for 58 percent and 41 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Lincoln AA is excellent based on excellent home purchase, good home refinance, and adequate home improvement distributions. Our assessment weights performance based on the mix of home mortgage loans in this AA (56 percent home purchase, 41 percent home refinance, and 3 percent home improvement by number).

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is lower than its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Lincoln AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is good. The percentage of bank loans moderate-income geographies is near the demographic comparator, and the bank's market share of reported business loans in moderate-income geographies is near its overall product share.
- Performance in low-income tracts is excellent. The percentage of bank loans low-income geographies exceeds the demographic comparator, and the bank's market share of reported business loans in low-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Lincoln AA is poor. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Context and market analysis elevate otherwise very poor performance in moderate-income tracts to poor. While the bank reported only one farm loan in moderate-income geographies during the evaluation period, farm lending opportunities are limited (86 farms). The 2015 market share report reflects a total of seven farm loans in moderate-income geographies by other reporting lenders.
- Context and market analysis elevate otherwise poor performance in low-income tracts to adequate. While the bank did not report any farm loans in low-income geographies during the evaluation period, farm lending opportunities are limited (18 farms). The 2015 market share report reflects a total of one farm loan in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Lincoln AA is excellent, as evidenced by an excellent distribution of home mortgage loans, a good distribution of business loans, and an adequate good distribution of farm loans. Our assessment gives the most weight to home mortgage and business loans, as these products respectively account for 58 percent and 41 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Lincoln AA is excellent based on excellent home purchase, good home refinance, and good home improvement distributions. Our assessment gives the most weight to home purchase loans as they account for 56 percent of the bank's reported home mortgage loans in this AA (by number).

- The borrower distribution of home purchase loans is excellent. The percentage of bank loans to both low- and moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to both low-and moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home improvement lending to low-income borrowers by other lenders. The bank's market share of home improvement loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.

- Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Lincoln AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Lincoln AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Lincoln AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made ten CD loans totaling \$63.6 million during the evaluation period. By dollar volume, 98 percent of these loans fund revitalization projects, and the remainder provide affordable housing and community services to LMI persons. CD loans include a loan to construct an office building on a Brownfield site located in a moderate-income geography and designated redevelopment area. The project creates 454 permanent jobs targeting LMI communities, with 25 percent of the jobs available to residents with a high school degree or GED equivalent. The dollar volume of CD lending represents 60 percent of allocated Tier 1 Capital for the Lincoln AA.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 3,864 loans totaling \$490 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 306 percent of allocated Tier 1 Capital for the state of Nebraska.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Nebraska. Lending performance is weaker/good in the Grand Island and nonmetropolitan AAs, representing 34 percent of rated area deposits. Weaker performance is attributable to less favorable borrower distributions and CD lending.

INVESTMENT TEST

Investment Test performance in the state of Nebraska is rated Outstanding. Bank performance in the full-scope Lincoln AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Lincoln AA)

Bank performance in the full-scope Lincoln AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 31 investments totaling \$39.9 million during the evaluation period, plus another 60 qualifying grants and donations totaling \$480 thousand to at least 29 organizations. The bank also has 44 prior period investments with an aggregate outstanding balance of \$6.2 million. The dollar volume of investments represents 44.0 percent of allocated Tier 1 Capital for the Lincoln AA.

Investments are particularly responsive to an identified community development need for revitalization/job creation. Most current period investments (\$29.8 million or 73.7 percent) serve this need, including:

- Three NMTCs totaling \$19.4 million to construct an office building in a moderate-income census tract that is also a Brownfield site and city-designated redevelopment area. The project is expected to create 454 permanent jobs targeted to residents of LMI communities, 25 percent of which will be available to residents with a high school degree or GED equivalent.
- Three NMTCs totaling \$8.1 million to refinance the renovation of a school facility, fund its expansion, and provide working capital. The school is a state-of-the-art early childhood center that provides care and education for economically disadvantaged children from birth to age five. The expansion will create up to 17 full-time jobs and increase the number of students served (from 150 to 191).

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 21 such investments (current and prior period) totaling \$768 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Nebraska.

Because the bank was responsive to community development needs and opportunities in the Lincoln AA, broader statewide investments that provide only indirect benefit were considered and further support performance. Elsewhere in the state, the bank has 92 investments (current and prior period) totaling \$9 million and two unfunded commitments totaling \$50 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 5.7 percent of allocated Tier 1 Capital for the state of Nebraska.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Nebraska.

SERVICE TEST

Service Test performance in the state of Nebraska is rated High Satisfactory. Bank performance in the full-scope Lincoln AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Lincoln AA)

Bank performance in the Lincoln AA is good based on accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Lincoln AA. Our assessment weights performance in moderate-income areas more heavily, which are almost twice as populated. The bank has no branches in low-income geographies and three branches in moderate-income geographies. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas, as well as the availability and demonstrated usage of interactive voice response and ATMs by customers residing in LMI areas.

Branching activity has not adversely affected access to banking services. There was one branch opening in an upper-income geography and no branch closures during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Lincoln AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 77 qualified service activities involving 25 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 40 of those activities and 600 related service hours. Service activities primarily address community service needs, including financial education. Bank staff provided 37 financial education programs to approximately 450 participants. The bank also maintains an Individual Development Account program relationship with a local nonprofit organization.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Nebraska. Service performance is consistent/good in the Grand Island AA, representing 1 percent of rated area deposits. Service performance is stronger/excellent in the nonmetropolitan AAs, representing 33 percent of rated area deposits. Stronger performance is attributable to more accessible retail delivery systems.

State of Nevada

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, adequate geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. A good level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to identified community development needs for economic development/small business financing and revitalization/job creation.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems (with consideration for adjacent MUI branches) and adequate CD service performance.
- Weaker service performance in limited-scope areas negatively impacts our assessment and results in an overall good service performance conclusion for the state. Other performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Nevada section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Nevada

The state of Nevada is the bank's 13th largest rated area based on deposits. It accounts for \$4.1 billion (1.5 percent) of bank deposits, 99 (3 percent) of bank branches, 114 (2 percent) of bank ATMs, and 37,130 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has six AAs in this rated area, three of which are metropolitan areas. The three nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Nevada

We performed a full-scope review of the Las Vegas AA, which consists of the entire Las Vegas-Henderson-Paradise MSA. Other AAs received limited-scope reviews.

The Las Vegas AA is the bank's largest AA in this rated area based on deposits. It accounts for \$2.8 billion (68 percent) of rated area deposits, 68 (69 percent) of rated area branches, 73 (64 percent) of rated area ATMs, and 23,622 (64 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 50 percent business loans, 49.8 percent home mortgage loans, and less than 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Las Vegas AA.

LENDING TEST

Lending Test performance in the state of Nevada is rated Outstanding. Bank performance in the full-scope Las Vegas AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Las Vegas AA)

Bank performance in the full-scope Las Vegas AA is excellent based on a good level of lending activity, adequate overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. A good level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Las Vegas AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fifth of 38 banks in area deposits as of June 30, 2015, with \$2.8 billion deposits and a 6.1 percent deposit market share.
- During the evaluation period, the bank reported \$2.6 billion home mortgage, business, and farm loans in the AA. It also originated \$151 million in CD loans specific to the AA.
- Of all loans reported in the Las Vegas AA for the year 2015, the bank ranked second in the number and dollar volume of home mortgage loans, fourth in the number of business loans (sixth by dollar volume), and second in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 430 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Las Vegas AA is adequate, as evidenced by an adequate distribution of business loans, good distributions of home mortgage and farm loans, and no unexplained lending gaps. Our assessment gives the most weight to business loans as they account for the largest number of the bank's reported loans in this AA.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Las Vegas AA is good based on good home purchase, good home refinance, and adequate home improvement distributions.

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home purchase lending in moderate-income geographies by other lenders. The bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is near its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans is good.
 - Market aggregate analysis elevates otherwise poor performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and equals) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to good. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Las Vegas AA is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Las Vegas AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank did not report any farm loans in low-income geographies during the evaluation period, farm lending opportunity is limited (37 farms). The 2015 market share report reflects no farm loans in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Las Vegas AA is good, as evidenced by a good distribution of business loans, and adequate distributions of home mortgage and farm loans. Our assessment gives the most weight to business loans as they account for the largest number of the bank's reported loans in this AA.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Las Vegas AA is adequate based on adequate home purchase, adequate home improvement, and good home refinance distributions.

- The borrower distribution of home purchase loans is adequate.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers is lower than its overall product share.

- Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Las Vegas AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Las Vegas AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Las Vegas AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 12 CD loans totaling \$150.6 million during the evaluation period. By dollar volume, 91 percent of these loans fund revitalization projects, 8 percent support community services for LMI persons, and the remainder provide affordable housing to LMI persons or promote economic development. CD loans include a construction loan to develop a government office building in a moderate-income geography and SBA-designated HUBZone. The project will retain hundreds of jobs and create new employment opportunities. The dollar volume of CD lending represents 44 percent of allocated Tier 1 Capital for the Las Vegas AA.

Statewide Product Flexibility

The bank uses flexible lending products to serve credit needs. The bank originated 2,378 loans totaling \$444 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 89 percent of allocated Tier 1 Capital for the state of Nevada.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Nevada. Lending performance is consistent/excellent in the Reno AA, representing 19 percent of rated area deposits. Lending performance is weaker/good in the Carson City AA, representing 4 percent of rated area deposits. Lending performance is weaker/adequate in the nonmetropolitan AA, representing 9 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending, as well as less favorable borrower and geographic distributions (nonmetropolitan AA).

INVESTMENT TEST

Investment Test performance in the state of Nevada is rated Outstanding. Bank performance in the full-scope Las Vegas AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Las Vegas AA)

Bank performance in the full-scope Las Vegas AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 59 investments totaling \$50.9 million during the evaluation period, plus another 91 qualifying grants and donations totaling \$714 thousand to at least 39 organizations. The bank also has 64 prior period investments with an aggregate outstanding balance of \$24.3 million and three unfunded commitments totaling \$108 thousand. The dollar volume of investments (excluding unfunded commitments) represents 22.4 percent of allocated Tier 1 Capital for the Las Vegas AA.

Investments are particularly responsive to identified community development needs for economic development/small business financing and revitalization/job creation. Most current period investments (\$45.4 million or 88 percent) serve these needs, including:

- Eight bonds totaling \$22.9 million that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Las Vegas AA.
- Five NMTCs totaling \$4.1 million for a revitalization project in downtown Las Vegas that is projected to create 85 permanent jobs.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 10 such investments (current period) totaling \$51 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Nevada.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Nevada.

SERVICE TEST

Service Test performance in the state of Nevada is rated High Satisfactory. Bank performance in the full-scope Las Vegas AA is excellent, but performance differences in limited-scope areas have negative impact and result in an overall good service performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Las Vegas AA)

Bank performance in the Las Vegas AA is excellent based on readily accessible retail delivery systems and adequate CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Las Vegas AA, with consideration for MUI branches in close proximity to moderate-income geographies. The bank has four branches in low-income geographies and 13 branches in moderate-income geographies. The percentage of branches in low-income tracts exceeds, and in moderate-income tracts is near, the percentage of the population respectively residing in each area. Additionally, there are seven MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to moderate-income areas. Access is further supported by overall good ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

Branching activity has not adversely affected LMI access to banking services. The bank opened one branch and closed six branches during the evaluation period. There were net closures in low-income tracts (one branch) and middle-income tracts (four branches). Despite the closures, the bank maintains an excellent branch distribution in low-income areas. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average more than 50 hours per week for both LMI and MUI branches. A majority of branches are open Saturday and Sunday. In addition, a larger share of the branches in LMI areas are traditional branches.

Community Development Services

CD service performance is adequate in the Las Vegas AA based on the bank's relative level of services provided and some demonstrated leadership. The bank provided 203 qualified service activities involving 26 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 44 of those activities, although the average number of related service hours was limited. Service activities primarily address financial education needs, with 157 financial education programs provided to more than 3,000 primarily youth participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in limited scope AAs have negative impact and result in an overall good service performance conclusion and High Satisfactory Service Test rating for the state of Nevada. Service performance is weaker/good in the Reno AA, representing 19 percent of rated area deposits. Service performance is weaker/adequate in the Carson City AA, representing 4 percent of rated area deposits. Service performance is weaker/very poor in the nonmetropolitan AAs, representing 9 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of New Mexico

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, excellent geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good performance to excellent. A good level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to affordable housing needs, and the additional support of regional investments.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems (with emphasis on moderate-income areas) and excellent CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of New Mexico section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of New Mexico

The state of New Mexico is the bank's 25th largest rated area based on deposits. It accounts for \$1.5 billion (<1 percent) of bank deposits, 33 (1 percent) of bank branches, 44 (1 percent) of bank ATMs, and 11,798 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has six AAs in this rated area, three of which are metropolitan areas. The three nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of New Mexico

We performed a full-scope review of the Albuquerque AA, which consists of the entire Albuquerque MSA. Other AAs received limited-scope reviews.

The Albuquerque AA is the bank's largest AA in this rated area based on deposits. It accounts for \$1.0 billion (68 percent) of rated area deposits, 19 (58 percent) of rated area branches, 25 (57 percent) of rated area ATMs, and 8,293 (70 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 53 percent business loans, 46 percent home mortgage loans, and 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Albuquerque AA.

LENDING TEST

Lending Test performance in the state of New Mexico is rated Outstanding. Bank performance in the full-scope Albuquerque AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Albuquerque AA)

Bank performance in the full-scope Albuquerque AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. A good level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Albuquerque AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fifth of 24 banks in area deposits as of June 30, 2015, with \$1.0 billion deposits and a 7.3 percent deposit market share.
- During the evaluation period, the bank reported \$842 million home mortgage, business, and farm loans in the AA. It also originated \$41 million in CD loans specific to the AA.
- Of all loans reported in the Albuquerque AA for the year 2015, the bank ranked 12th in the number of home mortgage loans (11th by dollar volume), fourth in the number of business loans (third by dollar volume), and second in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 330 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Albuquerque AA is excellent, as evidenced by good distributions of home mortgage and farm loans, an excellent distribution of business loans, and no unexplained lending gaps. Our assessment gives the most weight to business loans and home mortgage loans, as these products respectively account for 53 percent and 46 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Albuquerque AA is good based on good home purchase, good home improvement, and adequate home refinance distributions.

- The geographic distribution of home purchase loans is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home improvement loans is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Albuquerque AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in both low- and moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Albuquerque AA is good.

- Context and market analysis elevate otherwise poor performance in low-income tracts to adequate. While the bank reported only one farm loan in low-income geographies during the evaluation period, farm lending opportunity is limited (42 farms). The 2015 market share report reflects no farm loans in low-income geographies by other reporting lenders.
- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is near its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Albuquerque AA is good, as evidenced by a good distribution of business loans and adequate distributions of home mortgage and farm loans. Our assessment gives the most weight to business loans as they account for 53 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Albuquerque AA is adequate based on adequate home purchase, adequate home refinance, and good home improvement distributions.

- The borrower distribution of home purchase loans is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home improvement loans is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Albuquerque AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Albuquerque AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Albuquerque AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made ten CD loans totaling \$41.1 million during the evaluation period. By dollar volume, 77 percent of these loans provide affordable housing to LMI persons (530 units created or rehabilitated), 13 percent fund revitalization projects, and 10 percent support community services for LMI persons. CD loans include a LIHTC equity bridge loan to recapitalize an aging public housing complex. The project has 98 affordable housing units (24 retained and 74 new), 96 of which are allocated for LMI tenants - including dedicated units for households with children, persons with special needs, and seniors. The dollar volume of CD lending represents 32 percent of allocated Tier 1 Capital for the Albuquerque AA.

Statewide CD lending provides additional support for our assessment. The bank made two CD loans totaling \$950 thousand in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another two CD loans totaling \$14.6 million with indirect benefit in a broader statewide area, which are considered because the bank is responsive to CD needs and opportunities in the Albuquerque AA. The combined volume of statewide CD lending represents 8 percent of allocated Tier 1 Capital for the state of New Mexico.

Statewide Product Flexibility

The bank uses flexible lending products to serve credit needs. The bank originated 978 loans totaling \$187 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 99 percent of allocated Tier 1 Capital for the state of New Mexico.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of New Mexico. Lending performance is weaker/good in the Santa Fe and nonmetropolitan AAs, collectively representing 28 percent of rated area deposits. Lending performance is weaker/adequate in the Las Cruces AA, representing 4 percent of rated area deposits. Weaker performance is attributable to less favorable geographic distributions, less favorable borrower distributions (Las Cruces and nonmetropolitan AAs), and less favorable CD lending (Las Cruces AA).

INVESTMENT TEST

Investment Test performance in the state of New Mexico is rated Outstanding. Bank performance in the full-scope Albuquerque AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Albuquerque AA)

Bank performance in the full-scope Albuquerque AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 121 investments totaling \$47.1 million during the evaluation period, plus another 152 qualifying grants totaling \$1.2 million to at least 73 organizations. The bank also has three prior period investments with an aggregate outstanding balance of \$1.4 million and one unfunded commitment totaling \$211 thousand. The dollar volume of investments (excluding unfunded commitments) represents 39.1 percent of allocated Tier 1 Capital for the Albuquerque AA.

Investments are particularly responsive to affordable housing needs. Most current period investments (\$36.5 million or 75.6 percent) have this community development purpose, including:

- An \$11.2 million LIHTC to renovate and expand an affordable housing project that consists of 98 units, including 78 units under Section 8 vouchers, seven LIHTC non-housing assistance payment units, and 15 units at rents affordable to tenants earning 60 percent or less of the AMI.
- Forty-two LIHTCs totaling \$11.1 million to construct a mixed-income, multi-family apartment building. Of 68 units, 56 units will be affordable to tenants earning 40 to 60 percent of the AMI. The development provides affordable housing and stabilization services for LMI persons, including those with special needs.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 27 such investments (current and prior period) totaling \$1.7 million. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of New Mexico.

Because the bank was responsive to community development needs and opportunities in the Albuquerque AA, broader statewide investments that provide only indirect benefit were considered and further support performance. Elsewhere in the state, the bank has 21 investments (current and prior period) totaling \$10.2 million. The dollar volume of these broader statewide investments represents 5.4 percent of allocated Tier 1 Capital for the state of New Mexico.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of New Mexico.

SERVICE TEST

Service Test performance in the state of New Mexico is rated Outstanding. Bank performance in the full-scope Albuquerque AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Albuquerque AA)

Bank performance in the Albuquerque AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Albuquerque AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of low-income areas. The bank has no branches in low-income geographies and eight branches in moderate-income geographies. The percentage of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by excellent ATM distributions in both low- and moderate-income areas, as well as the availability and demonstrated usage of interactive voice response and ATMs by customers residing in LMI areas.

Branching activity has not adversely affected access to banking services. There was one branch opening in a middle-income geography and no branch closures during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Albuquerque AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 92 qualified service activities involving 37 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 55 of those activities and nearly 800 related service hours. Service activities address a variety of CD initiatives, including financial education. Bank staff provided 37 financial education programs to nearly 800 participants, including several foreclosure prevention workshops.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of New Mexico. Service performance is consistent/excellent in the Las Cruces AA, representing 4 percent of rated area deposits. Service performance is weaker/adequate in the Santa Fe and nonmetropolitan AAs, collectively representing 29 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of North Dakota

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

The major factors that support this rating include:

- Good lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, an adequate level of lending activity, and the positive impact of CD lending, which elevates otherwise adequate performance to good. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to economic development/small business financing needs.
- Adequate service performance in the full-scope AA based on reasonably accessible retail delivery systems (with consideration for the bank's limited number of branches in this market) and excellent CD service performance.
- Stronger service performance in limited-scope AA positively impacts our assessment and results in overall good service performance conclusion for the state. There were no other performance differences in the limited-scope AA.

Refer to Tables 1-15 in the State of North Dakota section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of North Dakota

The state of North Dakota is the bank's 28th largest rated area based on deposits. It accounts for \$948 million (<1 percent) of bank deposits, 15 (<1 percent) of bank branches, 21 (<1 percent) of bank ATMs, and 9,905 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has six AAs in this rated area, one of which is a metropolitan area. The five nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of North Dakota

We performed a full-scope review of the Bismarck AA, which includes two (of four) counties in the Bismarck MSA. The other AA received limited-scope review.

The Bismarck AA is the bank's largest AA in this rated area based on deposits. It accounts for \$485 million (51 percent) of rated area deposits, four (27 percent) of rated area branches, seven (33 percent) of rated area ATMs, and 3,718 (38 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 69 percent business loans, 29 percent home mortgage loans, and 2 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Bismarck AA.

LENDING TEST

Lending Test performance in the state of North Dakota is rated High Satisfactory. Bank performance in the full-scope Bismarck AA is good, and performance in the limited-scope AA is consistent.

Conclusions for Areas Receiving Full-Scope Reviews (Bismarck AA)

Bank performance in the full-scope Bismarck AA is good based on an adequate level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the positive impact of CD lending, which elevates otherwise adequate lending performance to good. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Bismarck AA reflect adequate responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked third of 20 banks in area deposits as of June 30, 2015, with \$485 million deposits and a 12.7 percent deposit market share.
- During the evaluation period, the bank reported \$241 million home mortgage, business, and farm loans in the AA. It also originated \$6 million in CD loans specific to the AA.
- Of all loans reported in the Bismarck AA for the year 2015, the bank ranked ninth in the number and dollar volume of home mortgage loans, first in the number of business loans (second by dollar volume), and third in the number and dollar volume of farm loans. While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 140 home loan reporters. The bank's lending market shares for other products generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Bismarck AA is good, as evidenced by adequate distributions of home mortgage and farm loans, a good distribution of business loans, and no lending gaps. Our assessment gives the most weight to business loans as they account for 69 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Bismarck AA is adequate based on good home refinance, poor home purchase, and poor home improvement distributions.

- The geographic distribution of home purchase loans is poor.

- Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- Market aggregate analysis elevates otherwise very poor performance in low-income tracts to poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (but still somewhat lower than) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home improvement loans is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans moderate-income geographies is significantly below its overall product share.
 - Performance in low-income tracts is very poor. The bank reported no home improvement loans in low-income geographies during the evaluation period. The 2015 market share report reflects two home improvement loans in low-income geographies by other lenders.
- The geographic distribution of home refinance loans is good.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to good. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Bismarck AA is good.

- Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.
- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Bismarck AA is adequate. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (13 farms). The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Bismarck AA is adequate, as evidenced by good distributions of home mortgage and farm loans, and an adequate distribution of business loans. Our assessment gives the most weight to business loans as they account for 69 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Bismarck AA is good based on good home refinance, good home improvement, and excellent home purchase distributions.

- The borrower distribution of home purchase loans is excellent overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is lower than its overall product share. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Bismarck AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Bismarck AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.

Community Development Lending

CD lending has a positive impact on lending performance in the Bismarck AA. The bank demonstrated good responsiveness to CD lending needs and opportunities. The bank made five CD loans totaling \$6.1 million during the evaluation period. All of the CD loans are responsive to an identified community need for affordable housing for LMI persons (63 units created or rehabilitated). CD loans include a construction loan to develop a new LIHTC multifamily housing facility with 23 units allocated to tenants earning 30 to 50 percent of the area median income. The dollar volume of CD lending represents 10 percent of allocated Tier 1 Capital for the Bismarck AA.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 1,708 loans totaling \$307 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 265 percent of allocated Tier 1 Capital for the state of North Dakota.

Conclusions for Areas Receiving Limited-Scope Reviews

Lending test performance is consistent/good in the limited-scope AA.

INVESTMENT TEST

Investment Test performance in the state of North Dakota is rated Outstanding. Bank performance in the full-scope Bismarck AA is excellent, and there were no performance differences in the limited-scope AA.

Conclusions for Areas Receiving Full-Scope Reviews (Bismarck AA)

Bank performance in the full-scope Bismarck AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 14 investments totaling \$8.3 million during the evaluation period, plus another 55 qualifying grants and donations totaling \$104 thousand to at least 20 organizations. The bank also has 21 prior period investments with an aggregate outstanding balance of \$2.6 million. The dollar volume of investments represents 18.4 percent of allocated Tier 1 Capital for the Bismarck AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$5.5 million or 66 percent) have this community development purpose and primarily consist of ten bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Bismarck AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has seven such investments (current and prior period) totaling \$432 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of North Dakota.

Because the bank was responsive to community development needs and opportunities in the Bismarck AA, broader statewide investments that provide only indirect benefit were considered and have a neutral impact on performance. Elsewhere in the state, the bank has two investments (current and prior period) totaling \$300 thousand. The dollar volume of these broader statewide investments represents less than 1 percent of allocated Tier 1 Capital for the state of North Dakota.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of North Dakota.

SERVICE TEST

Service Test performance in the state of North Dakota is rated High Satisfactory. Bank performance in the full-scope Bismarck AA is adequate, but performance differences in limited-scope areas have positive impact and result in an overall good service performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Bismarck AA)

Bank performance in the Bismarck AA is adequate based on reasonably accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the Bismarck AA. Our assessment recognizes the bank's limited branch presence in the market. The bank has four branches in the AA, none of which are located in LMI areas. There is only one low-income geography in the AA, which is sparsely populated. Access is demonstrated by overall adequate borrower distributions under the Lending Test.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Bismarck AA based on the bank's relatively high level of services provided and demonstrated leadership. The bank provided 23 qualified service activities involving 11 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 15 of those activities and approximately 200 related service hours. Most service activities address financial education needs. Bank staff provided seven financial education programs to 169 participants, including small businesses, senior citizens, and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in limited scope AAs have positive impact and result in an overall good service performance conclusion and High Satisfactory Service Test rating for the state of North Dakota. Service performance is stronger/excellent in the nonmetropolitan AAs, representing 49 percent of rated area deposits. Stronger performance is attributable to more accessible retail delivery systems.

State of Ohio

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AAs based on good borrower distributions, excellent geographic distributions, a good level of lending activity, and good to excellent levels of CD lending, which elevate otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AAs based on investment activity, responsiveness to community development needs for revitalization/job creation and affordable housing, and the additional support of regional investments.
- Excellent overall service performance in the full-scope AAs based on readily accessible retail delivery systems (with consideration for adjacent MUI branches in the Cleveland AA) and at least good CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Ohio section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Ohio

The state of Ohio is the bank's 10th largest rated area based on deposits. It accounts for \$6.5 billion (2.3 percent) of bank deposits, 210 (7 percent) of bank branches, 253 (5 percent) of bank ATMs, and 84,325 (5 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 18 AAs in this rated area as of year-end 2015, 11 of which are metropolitan areas. The seven nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Ohio

We performed full-scope reviews of the Cleveland and Columbus AAs. The Cleveland AA consists of the entire Cleveland-Elyria MSA. The Columbus AA includes nine (of 10) counties in the Columbus MSA as of year-end 2015. Other AAs received limited-scope reviews.

The Cleveland AA is the bank's largest AA in this rated area based on deposits. It accounts for \$2.2 billion (34 percent) of rated area deposits, 59 (28 percent) of rated area branches, 85 (34 percent) of rated area ATMs, and 19,751 (23 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 62 percent business loans, 38 percent home mortgage loans, and less than 1 percent farm loans.

The Columbus AA is the second largest AA in this rated area based on deposits. It accounts for \$1.4 billion (22 percent) of rated area deposits, 46 (22 percent) of rated area branches, 55 (22 percent) of rated area ATMs, and 21,931 (26 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 51 percent home mortgage loans, 48 percent business loans, and 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the full-scope AAs.

LENDING TEST

Lending Test performance in the state of Ohio is rated Outstanding. Bank performance in the full-scope Cleveland and Columbus AAs is excellent, and performance differences in the limited-scope AAs did not impact the rating. An excellent level of flexible lending in the state further supports lending performance.

Conclusions for Areas Receiving Full-Scope Reviews

Cleveland AA

Bank performance in the full-scope Cleveland AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Cleveland AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked ninth of 37 banks in area deposits as of June 30, 2015, with \$2.2 billion deposits and a 3.4 percent deposit market share.
- During the evaluation period, the bank reported \$1.1 billion home mortgage, business, and farm loans in the AA. It also originated \$63 million in CD loans specific to the AA.
- Of all loans reported in the Cleveland AA for the year 2015, the bank ranked ninth in the number of home mortgage loans (tenth by dollar volume), third in the number of business loans (seventh by dollar volume), and second in the number of farm loans (sixth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 435 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Cleveland AA is excellent, as evidenced by good distributions of home mortgage and farm loans, excellent distributions of multifamily and business loans, and no unexplained lending gaps. Our assessment gives the most weight to business and home mortgage loans, as these products respectively account for 62 percent and 38 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Cleveland AA is good based on good home refinance, good home improvement, and excellent home purchase distributions.

- The geographic distribution of home purchase loans is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise adequate performance in low-income tracts to good. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.

- Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is near its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Cleveland AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Cleveland AA is excellent. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Cleveland AA is good. The percentage of bank loans in both low- and moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in both low- and moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Cleveland AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Cleveland AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Cleveland AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Cleveland AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Cleveland AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made ten CD loans totaling \$62.6 million during the evaluation period. By dollar volume, 62 percent of these loans provide affordable housing to LMI persons (2,160 units created or rehabilitated), and 38 percent fund revitalization projects. CD loans include a loan to acquire a senior residential facility with 424 units, which are subsidized through Section 8 vouchers. The dollar volume of CD lending represents 24 percent of allocated Tier 1 Capital for the Cleveland AA.

Columbus AA

Bank performance in the full-scope Columbus AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Columbus AA reflect good responsiveness to area credit needs in relation to deposits.

- USB ranked eighth of 57 banks in area deposits as of June 30, 2015, with \$1.4 billion deposits and a 2.4 percent deposit market share.
- During the evaluation period, the bank reported \$1.7 billion home mortgage, business, and farm loans in the AA. It also originated \$7 million in CD loans specific to the AA.
- Of all loans reported in the Columbus AA for the year 2015, the bank ranked fifth in the number of home mortgage loans (sixth by dollar volume), fourth in the number of business loans (eighth by dollar volume), and fourth in the number of farm loans (tenth by dollar volume). The bank's lending market shares generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Columbus AA is excellent, as evidenced by an excellent distribution of home mortgage loans, good distributions of business and farm loans, and no unexplained lending gaps. Our assessment gives the most weight to home mortgage loans as they account for 51 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Columbus AA is excellent based on excellent home purchase, good home refinance, and adequate home improvement distributions. Our assessment gives the most weight to home purchase and home refinance loans, as these products respectively account for 54 percent and 43 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is excellent.
 - The geographic distribution of home purchase loans in the 2012-2013 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.

- Market aggregate analysis elevates otherwise adequate performance in low-income tracts to good. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending in low-income geographies by other lenders. The bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home purchase loans in the 2014-2015 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate overall.
 - The geographic distribution of home improvement loans in the 2012-2013 period is poor overall.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is near its overall product share.
- The geographic distribution of home refinance loans is good.
 - The geographic distribution of home refinance loans in the 2012-2013 period is good.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.

- Market aggregate analysis elevates otherwise adequate performance in low-income tracts to good. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies is near its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Columbus AA is good based on good business loan distributions in both the 2012-2013 and 2014-2015 periods.

- The geographic distribution of reported business loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is significantly below its overall product share.
- The geographic distribution of reported business loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies equals the demographic comparator, and the bank's market share of business loans in low-income geographies exceeds its overall product share for the 2014-2015 period.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Columbus AA is good based on good farm loan distributions in both the 2012-2013 and 2014-2015 periods.

- The geographic distribution of reported farm loans in the 2012-2013 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
 - Context and market analysis elevate otherwise very poor performance in low-income tracts to poor. While the bank did not report any farm loans in low-income geographies during this period, farm lending opportunity is somewhat limited (168 farms). The 2013 market share report reflects a total of one farm loan in low-income geographies by other reporting lenders.
- The geographic distribution of reported farm loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is somewhat lower than its overall product share.
 - Context and market analysis elevate otherwise very poor performance in low-income tracts to adequate. While the bank reported only one farm loan in low-income geographies during this period, farm lending opportunity is somewhat limited (142 farms). The 2015 market share report reflects a total of one farm loan in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Columbus AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Columbus AA is good based on good home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is good.
 - The borrower distribution of home purchase loans in the 2012-2013 period is good.

- Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall product share.
- The borrower distribution of home purchase loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.

- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Columbus AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Columbus AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a positive impact on lending performance in the Columbus AA. The bank demonstrated good responsiveness to CD lending needs and opportunities. The bank made four CD loans totaling \$6.6 million during the evaluation period. By dollar volume, 77 percent of these loans provide affordable housing to LMI persons, and 23 percent fund revitalization projects. CD loans include construction and bridge financing to develop a LIHTC housing facility for seniors. All 56 units are allocated to seniors earning 30 to 60 percent of the area median income. The dollar volume of CD lending represents 8 percent of allocated Tier 1 Capital for the Columbus AA.

Statewide Community Development Lending

Statewide CD lending has a neutral impact on performance. The bank made two CD loans totaling \$2.5 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another CD loan totaling \$667 thousand with indirect benefit in a broader statewide area, which is considered because the bank is responsive to CD needs and opportunities in the full-scope AAs. The combined volume of statewide CD lending represents less than 1 percent of allocated Tier 1 Capital for the state of Ohio.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 9,724 loans totaling \$1.2 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 157 percent of allocated Tier 1 Capital for the state of Ohio.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Ohio. Lending performance is consistent/excellent in the Akron and Dayton AAs, collectively representing 17 percent of rated area deposits. Lending performance is weaker/adequate in the Lima and Weirton-Steubenville AAs, collectively representing 2 percent of rated area deposits. Lending performance is weaker/good in the eight remaining limited-scope AAs, collectively representing 25 percent of rated area deposits. Weaker performance is attributable to less favorable borrower distributions (Lima and Springfield AAs), less favorable geographic distributions (Canton-Massillon, Huntington-Ashland, Lima, Mansfield, Springfield, Toledo, Weirton-Steubenville, and Youngstown-Warren-Boardman AAs), and less favorable CD lending (Canton-Massillon, Huntington-Ashland, Lima, Sandusky, Springfield, Toledo, Weirton-Steubenville, and nonmetropolitan AAs).

INVESTMENT TEST

Investment Test performance in the state of Ohio is rated Outstanding. Bank performance in the full-scope Cleveland and Columbus AAs is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in both full-scope AAs is excellent in relation to bank capacity, identified needs, and available investment opportunities.

Cleveland AA

USB demonstrated an excellent level of investment activity with 297 investments totaling \$66.7 million during the evaluation period, plus another 184 qualifying grants and donations totaling \$744 thousand to at least 70 organizations. The bank also has 53 prior period investments with an aggregate outstanding balance of \$21.2 million and three unfunded commitments totaling \$103 thousand. The dollar volume of investments (excluding unfunded commitments) represents 33.4 percent of allocated Tier 1 Capital for the Cleveland AA.

Investments are particularly responsive to community development needs for revitalization/job creation and affordable housing. Most current period investments (\$66.7 million or 99 percent) serve these needs, including:

- Nineteen HTC's totaling \$32.1 million and an \$8.2 million NMTC to redevelop three buildings into a pedestrian-friendly retail, office, hotel, and residential complex. The site had long been a redevelopment priority for the city of Cleveland, with a majority of the complex vacant since 1996. The development is projected to retain/create 350 permanent jobs. It also provides a much needed downtown supermarket and 40 apartments affordable to tenants earning 80 percent or less of the AMI.
- Twenty-four LIHTC's totaling \$3.1 million to repurpose an abandoned hospital into a mixed-use facility that includes 137 units of affordable housing for seniors, a K-8 public charter school, space for the Boys & Girls Club of Cleveland to host after-school programs, and affordable space for local nonprofit organizations.

Columbus AA

USB demonstrated an excellent level of investment activity with 320 investments totaling \$30.9 million during the evaluation period, plus another 109 qualifying grants totaling \$435 thousand to at least 41 organizations. At year-end 2015, the bank also has 39 prior period investments with an aggregate outstanding balance of \$4.2 million. The dollar volume of investments represents 21.1 percent of allocated Tier 1 Capital for the Columbus AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$28.5 million or 90.9 percent), serve this need, including a \$9 million LIHTC to finance a multifamily housing project for seniors with 56 units affordable to tenants earning 60 percent or less of the AMI.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 23 such investments (current and prior period) totaling \$814 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Ohio.

Because the bank was responsive to community development needs and opportunities in the full-scope AAs, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 366 investments (current and prior period) totaling \$45.7 million and two unfunded commitments totaling \$11.8 million. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 5.8 percent of allocated Tier 1 Capital for the state of Ohio.
- The bank also has 99 regional investments (current and prior period) totaling \$106.8 million, and four unfunded commitments totaling \$10.5 million, in the broader East North Central Division, which includes the states of Illinois, Indiana, Ohio, and Wisconsin. The dollar volume of these regional investments (excluding unfunded commitments) represents 1.8 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Chicago MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Ohio.

SERVICE TEST

Service Test performance in the state of Ohio is rated Outstanding. Bank performance in the full-scope Cleveland and Columbus AAs is overall excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in the full-scope AAs is overall excellent. Our assessment gives more weight to performance in the Cleveland AA as it accounts for a larger share of the bank's deposits.

Cleveland AA

Bank performance in the Cleveland AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Cleveland AA. Our assessment recognizes MUI branches in close proximity to LMI geographies. The bank has five branches in low-income geographies and 11 branches in moderate-income geographies. The percentage of branches in low-income areas is near, and in moderate-income areas exceeds, the percentage of the population respectively residing in each area. Additionally, there are 13 MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is further supported by excellent ATM distributions in both low- and moderate-income areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Discretionary branching activity has not adversely affected LMI access to banking services. The bank opened nine branches and closed 15 branches during the evaluation period. There were net closures in low-income tracts (one branch), moderate-income tracts (one branch), middle-income tracts (three branches), and upper-income tracts (one branch). At the site of the low-tract branch closure, the bank maintains a drive-up ATM. The moderate-tract branch closure was not within bank control as the grocery store partnered with another financial institution. Despite the LMI branch closures, the bank maintains excellent branch distributions in LMI areas (with consideration for adjacent MUI branches). We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Cleveland AA based on the bank's relative level of services provided, demonstrated leadership, and responsiveness to an identified community need for financial education. The bank provided 206 qualified service activities involving 46 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 88 of those activities and 1,400 related service hours.

Service activities address a variety of CD initiatives and are particularly responsive to an identified need for financial education. Service activity examples during the evaluation period include:

- Bank staff provided 118 financial education programs to more than 3,000 participants, including several adult financial literacy and elder fraud prevention workshops.
- A bank employee provided 90 service hours as a three-year board member of an organization that provides support for small business growth and advancement within the Northeast Ohio Hispanic community.
- Two bank employees provided nearly 160 service hours as board and committee members of a local development corporation that stimulates economic growth and creates employment opportunities through oversight of small business lending programs.
- The bank also maintains an Individual Development Account program relationship with a local housing nonprofit organization to assist individuals working toward homeownership.

Columbus AA

Bank performance in the Columbus AA is good based on accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Columbus AA. The bank has three branches in low-income geographies and twelve branches in moderate-income geographies. The percentage of branches in low-income area is somewhat lower than, and in moderate-income areas exceeds, the percentage of the population respectively residing in each area. Access is further supported by overall excellent ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Branching activity has not adversely affected access to banking services. The bank opened seven branches and closed nine branches during the evaluation period. There were net closures in low-income tracts (one branch) and upper-income tracts (two branches), and one net opening in middle-income tracts. Despite the closures, the bank maintains an adequate branch distribution in low-income areas. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average approximately 50 hours per week for both LMI and MUI branches. Nearly all branches are open Saturday, and more than one-third are open Sunday. In addition, a larger share of the branches in LMI areas have drive-up facilities.

Community Development Services

CD service performance is good in the Columbus AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 87 qualified service activities involving 36 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 60 of those activities and more than 1,300 related service hours. Service activities primarily address community service needs, including financial education. Bank staff provided 27 financial education programs to 850 participants, including small businesses and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Ohio. Service performance is consistent/excellent in the Akron, Huntington-Ashland, and nonmetropolitan AAs, collectively representing 27 percent of rated area deposits. Service performance is weaker/good in the Sandusky, Toledo, and Weirton-Steubenville AAs, collectively representing 2 percent of rated area deposits. Service performance is weaker/adequate in the Dayton, Lima, Mansfield, Springfield, and Youngstown-Warren-Boardman AAs, collectively representing 15 percent of rated area deposits. Service performance is weaker/very poor in the Canton-Massillon AA, representing 1 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Oregon

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AAs based on adequate-to-good borrower distributions, good geographic distributions, good levels of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good performance to excellent. A good level of flexible lending in the state further supports lending performance. Weaker lending performance in the limited-scope AAs negatively impacts our assessment and results in an overall good lending performance conclusion for the state.
- Good overall investment performance in the full-scope AAs based on investment activity and responsiveness to identified community development needs for economic development/small business financing and affordable housing. Stronger investment performance in most limited-scope AAs positively impacts our assessment and results in an overall excellent performance conclusion for the state.
- Excellent overall service performance in the full-scope AAs based on readily accessible retail delivery systems (with emphasis on moderate-income areas in the Eastern Oregon AA) and at least adequate CD service performance. Service performance differences in the limited-scope areas did not affect the state rating.

Refer to Tables 1-15 in the State of Oregon section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Oregon

The state of Oregon is the bank's 11th largest rated area based on deposits. It accounts for \$4.8 billion (1.7 percent) of bank deposits, 100 (3 percent) of bank branches, 156 (3 percent) of bank ATMs, and 44,163 (3 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 10 AAs in this rated area, seven of which are metropolitan areas. One nonmetropolitan AA (Eastern OR) received full-scope review. The other two nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Oregon

We performed a full-scope reviews of the Salem and Eastern Oregon AAs. The Salem AA consists of the entire Salem MSA. The Eastern Oregon AA consists of 12 nonmetropolitan counties as of year-end 2015. Other AAs received limited-scope reviews.

The Salem AA is the bank's 2nd largest AA in this rated area based on deposits. It accounts for \$890 million (19 percent) of rated area deposits, 17 (17 percent) of rated area branches, 32 (21 percent) of rated area ATMs, and 8,928 (20 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 62 percent business loans, 35 percent home mortgage loans, and 3 percent farm loans.

The Eastern Oregon AA is the bank's largest AA in this rated area based on deposits. It accounts for \$960 million (21 percent) of rated area deposits, 20 (20 percent) of rated area branches, 27 (17 percent) of rated area ATMs, and 8,011 (18 percent) of rated area loans. The bank's mix of loans reported in this area (by number, excluding CD loans) is 61 percent business loans, 30 percent home mortgage loans, and 8 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the full-scope AAs.

LENDING TEST

Lending Test performance in the state of Oregon is rated High Satisfactory. Bank performance in the full-scope Salem and Eastern Oregon AAs is excellent, but weaker performance in limited-scope areas has negative impact and results in an overall good lending performance conclusion for the state. A good level of flexible lending in the state further supports lending performance.

Conclusions for Areas Receiving Full-Scope Reviews

Salem AA

Bank performance in the full-scope Salem AA is excellent based on a good level of lending activity, good overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Salem AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 14 banks in area deposits as of June 30, 2015, with \$890 million deposits and an 18.5 percent deposit market share.
- During the evaluation period, the bank reported \$635 million home mortgage, business, and farm loans in the AA. It also originated \$24 million in CD loans specific to the AA.

- Of all loans reported in the Salem AA for the year 2015, the bank ranked second in the number and dollar volume of home mortgage loans, second in the number of business loans (third by dollar volume), and second in the number of farm loans (third by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 295 home loan reporters. The bank's lending market shares for other products (by number of loans) exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Salem AA is good, as evidenced by an excellent distribution of home mortgage loans, a good distribution of business loans, an adequate distribution of farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Salem AA is excellent based on excellent home purchase, excellent home refinance, and good home improvement distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.

Small Loans to Businesses

The geographic distribution of reported business loans in the Salem AA is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

Small Loans to Farms

The geographic distribution of reported farm loans in the Salem AA is adequate. Context and market analysis elevate otherwise poor performance in moderate-income tracts to adequate. While the bank reported only ten farm loans in moderate-income geographies during the evaluation period, farm lending opportunity is somewhat limited (155 farms). The 2015 market share report reflects a total of four farm loans in moderate-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Salem AA is good, as evidenced by good distributions of home mortgage and business loans, and an adequate distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Salem AA is good based on excellent home purchase, adequate home improvement, and good home refinance distributions.

- The borrower distribution of home purchase loans is excellent.
 - Consideration for the area's high housing costs, shortage of affordable housing stock, and market aggregate performance elevates otherwise adequate performance in the low-income sector to excellent. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Salem AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Salem AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Salem AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 12 CD loans totaling \$24 million during the evaluation period. By dollar volume, 69 percent of these loans fund revitalization projects, 23 percent support community services for LMI persons, and 8 percent provide affordable housing to LMI persons. CD loans include a construction loan to develop a blighted site in an Urban Renewal area and SBA-designated HUBZone. The project, which is part of a larger city redevelopment plan, will create a 115-unit apartment complex, retail and office space, parking, and new jobs. The dollar volume of CD lending represents 22 percent of allocated Tier 1 Capital for the Salem AA.

Eastern Oregon AA

Bank performance in the full-scope Eastern Oregon AA is excellent based on a good level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Eastern Oregon AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked first of 15 banks in area deposits as of June 30, 2015, with \$960 million deposits and a 23.1 percent deposit market share.
- During the evaluation period, the bank reported \$488 million home mortgage, business, and farm loans in the AA. It also originated \$4 million in CD loans specific to the AA.
- Of all loans reported in the Eastern Oregon AA for the year 2015, the bank ranked third in the number of home mortgage loans (fourth by dollar volume), first in the number of business loans (second by dollar volume), and second in the number of farm loans (fifth by dollar volume). While lending market shares are generally less than the bank's deposit market share, this is a competitive market with more than 265 home loan reporters and at least 25 business/farm loan reporters.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Eastern Oregon AA is good, as evidenced by an adequate distribution of home mortgage loans, good distributions of business and farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Eastern Oregon AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is adequate.
 - The geographic distribution of home purchase loans in the 2012-2013 period is adequate overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The bank reported no home purchase loans in low-income geographies during the 2012-2013 period. The 2013 market share report reflects a total of 26 home purchase loans in low-income geographies by other lenders.
 - The geographic distribution of home purchase loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is lower than its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate.
 - The geographic distribution of home improvement loans in the 2012-2013 period is adequate overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The bank reported no home improvement loans in low-income geographies during the 2012-2013 period. The 2013 market share report reflects a total of one home improvement loan in low-income geographies by other lenders.

- The geographic distribution of home improvement loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate.
 - The geographic distribution of home refinance loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.
 - The geographic distribution of home refinance loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Eastern Oregon AA is good. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported business loans.

- The geographic distribution of reported business loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.

- Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is lower than its overall product share.
- The geographic distribution of reported business loans in the 2012-2013 period is adequate overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of business loans in low-income geographies is significantly below its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Eastern Oregon AA is good. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (three farms). Our assessment also gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported farm loans.

- The geographic distribution of reported farm loans in the 2014-2015 period is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of reported farm loans in the 2012-2013 period is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator for the 2012-2013 period, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Eastern Oregon AA is adequate, as evidenced by a good distribution of home mortgage loans, and adequate distributions of business and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Eastern Oregon AA is good based on good home refinance, good home improvement, and adequate home purchase distributions.

- The borrower distribution of home purchase loans is adequate.
 - The borrower distribution of home purchase loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.

- Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
- Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home purchase loans in the 2014-2015 period is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The overall distribution of reported loans to businesses of different sizes in the Eastern Oregon AA is adequate. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported business loans.

- The distribution of reported loans to businesses of different sizes in the 2014-2015 period is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses is near its overall product share.
- The distribution of reported loans to businesses of different sizes in the 2012-2013 period is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The overall distribution of reported loans to farms of different sizes in the Eastern Oregon AA is adequate. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported farm loans.

- The distribution of reported loans to farms of different sizes in the 2014-2015 period is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms is near its overall product share.
- The distribution of reported loans to farms of different sizes in the 2012-2013 period is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Eastern Oregon AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities, with consideration of broader statewide CD lending. The bank made four CD loans totaling \$3.8 million during the evaluation period, all of which provide affordable housing to LMI persons (135 units created or rehabilitated). CD loans include financing (as part of a private placement tax exempt bond) to acquire and rehabilitate three existing LIHTC housing projects. Loan proceeds are allocated for two multifamily housing projects located in a distressed middle-income geography. The loan creates 70 affordable housing units under a Rural Development rent subsidy program that will be allocated to tenants earning 60 or less of the area median income. The dollar volume of CD lending represents 6 percent of allocated Tier 1 Capital for the Eastern Oregon AA.

Statewide and Regional Community Development Lending

Statewide CD lending elevates otherwise adequate CD lending performance in the Eastern Oregon AA to excellent, and provides additional support for performance in the Salem AA. The bank made 14 CD loans totaling \$89.4 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The dollar volume of statewide CD lending represents 15 percent of allocated Tier 1 Capital for the state of Oregon.

Regional CD lending has a neutral impact on performance. The bank made two CD loans totaling \$12.3 million in the Pacific Division, which includes the states of Alaska, California, Hawaii, Oregon, and Washington. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the full-scope AAs. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of California, Oregon, and Washington, as well as the multistate metropolitan areas of Lewiston and Portland.

Statewide Product Flexibility

The bank uses flexible lending products to serve credit needs. The bank originated 2,353 loans totaling \$515 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 89 percent of allocated Tier 1 Capital for the state of Oregon.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did negatively impact our assessment and result in an overall good lending performance conclusion and High Satisfactory Lending Test rating for the state of Oregon. Lending performance is weaker/good in six limited-scope AAs, collectively representing 58 percent of rated area deposits (Albany, Bend-Redmond, Corvallis, Eugene, Medford, and other nonmetropolitan AAs). Lending performance is weaker/poor in the Grants Pass AA, representing 2 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending, less favorable borrower distributions (Grants Pass AA), and less favorable geographic distributions (Grants Pass and Medford AAs).

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

Investment Test performance in the state of Oregon is rated Outstanding. Bank performance in the full-scope Salem and Eastern Oregon AAs is overall good, but stronger performance in the limited-scope areas has positive impact and results in an overall excellent investment performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in the full-scope AAs is overall good in relation to bank capacity, identified needs, and available investment opportunities. Our assessment gives more weight to performance in the Eastern Oregon AA as it represents a larger share of rated area deposits.

Salem AA

USB demonstrated an excellent level of investment activity with 25 investments totaling \$8.8 million during the evaluation period, plus another 36 qualifying grants totaling \$227 thousand to 22 organizations. The bank also has 30 prior period investments with an aggregate outstanding balance of \$3.8 million. The dollar volume of investments represents 11.8 percent of allocated Tier 1 Capital for the Salem AA.

Investments are particularly responsive to an identified community development need for economic development/small business financing. Most current period investments (\$5 million or 56.1 percent) serve this need and primarily consist of nine bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Salem AA.

Eastern Oregon AA

USB demonstrated a good level of investment activity with 43 investments totaling \$7.4 million during the evaluation period, plus another 42 qualifying grants totaling \$117 thousand to at least 20 organizations. At year-end 2015, the bank also has 32 prior period investments with an aggregate outstanding balance of \$1.1 million. The dollar volume of investments represents 7.0 percent of allocated Tier 1 Capital for the Eastern Oregon AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$4 million or 53.7 percent) serve this need, including fifteen LIHTCs totaling \$2.1 million to renovate a low-income, 36-unit apartment complex for tenants earning less than 50 percent of the AMI.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 49 such investments (current and prior period) totaling \$1.6 million. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Oregon.

Because the bank was responsive to community development needs and opportunities in the full-scope AAs, broader statewide and regional investments that provide only indirect benefit were considered and have a neutral impact on performance.

- Elsewhere in the state, the bank has four investments (current and prior period) totaling \$8 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents less than 1 percent of allocated Tier 1 Capital for the state of Oregon.

- The bank also has 54 regional investments (current and prior period) totaling \$56.1 million, and three unfunded commitments totaling \$68 thousand, in the broader Pacific Division, which includes the states of California, Oregon, and Washington. The dollar volume of these regional investments represents less than 1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Portland MMA (excluding unfunded commitments).

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did positively impact our assessment and result in an overall excellent investment conclusion and Outstanding Investment Test rating for the state of Oregon. Investment performance is consistent/good in the Grants Pass AA, representing 2 percent of rated area deposits. Investment performance is stronger/excellent in the remaining seven limited-scope AAs, which collectively represent 58 percent of rated area deposits. Stronger performance is attributable to higher relative investment volumes.

SERVICE TEST

Service Test performance in the state of Oregon is rated Outstanding. Bank performance in the full-scope Salem and Eastern Oregon AAs is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews

Salem AA

Bank performance in the Salem AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Salem AA. The bank has four branches in moderate-income geographies. There are no low-income geographies in the AA. The percentage of branches in moderate-income areas exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Salem AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 53 qualified service activities involving nine different organizations during the evaluation period. Leadership is evident through Board or committee participation in 27 of those activities and more than 1,600 related service hours. Service activities primarily address community service needs, including financial education. Bank staff provided 26 financial education programs to approximately 600 participants.

Eastern Oregon AA

Bank performance in the Eastern Oregon AA is excellent based on readily accessible retail delivery systems and adequate CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Eastern Oregon AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of the area's sole low-income geography. The bank has no branches in low-income geographies and four branches in moderate-income geographies. The percentage of branches in moderate-income areas exceeds the percentage of the population residing there. Access is further supported by an excellent ATM distribution in moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is adequate in the Eastern Oregon AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 61 qualified service activities involving 25 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 23 of those activities and approximately 350 related service hours. Service activities primarily address community service needs, including financial education. Bank staff provided 38 financial education programs to nearly 800 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Oregon. Service performance is consistent/excellent in the Bend-Redmond, Corvallis, Eugene, and other nonmetropolitan AAs, collectively representing 47 percent of rated area deposits. Service performance is weaker/good in the Albany AA, representing 1 percent of rated area deposits). Service performance is weaker/ adequate in the Grants Pass AA, representing 2 percent of rated area deposits. Service performance is weaker/poor in the Medford AA, representing 10 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of South Dakota

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, excellent geographic distributions, and an excellent level of lending activity. The significantly positive impact of CD lending and an excellent level of flexible lending in the state further supports lending performance. Weaker lending performance in limited-scope areas negatively impacts our assessment and results in an overall good lending performance conclusion for the state.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to economic development/small business financing needs. Investment performance was consistent in the limited-scope areas.
- Excellent service performance based on readily accessible retail delivery systems and excellent CD service performance. Service performance differences in the limited-scope areas did not affect the state rating.

Refer to Tables 1-15 in the State of South Dakota section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of South Dakota

The state of South Dakota is the bank's 27th largest rated area based on deposits. It accounts for \$1.0 billion (<1 percent) of bank deposits, 17 (1 percent) of bank branches, 39 (1 percent) of bank ATMs, and 12,767 (1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has five AAs in this rated area, two of which are metropolitan areas. The three nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of South Dakota

We performed a full-scope review of the Sioux Falls AA, which includes two (of four) counties in the Sioux Falls MSA. Other AAs received limited-scope reviews.

The Sioux Falls AA is the bank's largest AA in this rated area based on deposits. It accounts for \$441 million (44 percent) of rated area deposits, 10 (59 percent) of rated area branches, 27 (69 percent) of rated area ATMs, and 7,061 (55 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 52 percent home mortgage loans, 42 percent business loans, and 6 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Sioux Falls AA.

LENDING TEST

Lending Test performance in the state of South Dakota is rated High Satisfactory. Bank performance in the full-scope Sioux Falls AA is excellent, but weaker performance in limited-scope areas has negative impact and results in an overall good lending performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews (Sioux Falls AA)

Bank performance in the full-scope Sioux Falls AA is excellent based on an excellent level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which further supports excellent lending performance. An excellent level of flexible lending in the state also supports lending performance.

Lending Activity

Lending levels in the Sioux Falls AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked eighth of 28 banks in area deposits as of June 30, 2015, with \$441 million deposits and a 0.1 percent deposit market share.
- During the evaluation period, the bank reported \$700 million home mortgage, business, and farm loans in the AA. It also originated \$16 million in CD loans specific to the AA.
- Of all loans reported in the Sioux Falls AA for the year 2015, the bank ranked ninth in the number and dollar volume of home mortgage loans, first in the number business loans (sixth by dollar volume), and second in the number and dollar volume of farm loans. The bank's lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Sioux Falls AA is excellent, as evidenced by excellent distributions of home mortgage, business, and farm loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Sioux Falls AA is excellent based on excellent home purchase, adequate home improvement, and good home refinance distributions. Our assessment gives the most weight to home purchase and home refinance loans, as these products respectively account for 65 percent and 31 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.

Small Loans to Businesses

The geographic distribution of reported business loans in the Sioux Falls AA is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The geographic distribution of reported farm loans in the Sioux Falls AA is excellent. While the bank reported only ten farm loans in moderate-income geographies during the evaluation period, our assessment considers the limited opportunity for farm lending (97 farms). The 2015 market share report reflects that of all reporting lenders, the bank reported the most farm loans in moderate-income geographies.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Sioux Falls AA is good, as evidenced by an excellent distribution of home mortgage loans, an adequate distribution of business loans, and a good distribution of farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Sioux Falls AA is excellent based on excellent home purchase, excellent home refinance, and good home improvement distributions.

- The borrower distribution of home purchase loans is excellent. The percentage of bank loans to both low- and moderate-income borrowers essentially equals (or exceeds) the demographic comparator, and the bank's market share of home purchase loans to both low- and moderate-income borrowers exceeds its overall product share.

- The borrower distribution of home improvement loans is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is somewhat lower than its overall product share. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is excellent overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Sioux Falls AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses is near its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Sioux Falls AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Sioux Falls AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made nine CD loans totaling \$16.3 million during the evaluation period. By dollar volume, 74 percent of these loans fund revitalization projects, 25 percent promote economic development, and the remainder provide affordable housing to LMI persons. CD loans include a construction-to-permanent loan to develop a single tenant retail property in a middle-income geography, which is adjacent to several moderate-income geographies. The project creates 50 to 100 jobs for LMI persons. The dollar volume of CD lending represents 30 percent of allocated Tier 1 Capital for the Sioux Falls AA.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 860 loans totaling \$137 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 111 percent of allocated Tier 1 Capital for the state of South Dakota.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did negatively impact our assessment and result in an overall good lending performance conclusion and High Satisfactory Lending Test rating for the state of South Dakota. Lending performance is weaker/adequate in the Rapid City and Sioux Falls AAs, collectively representing 56 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending, borrower distributions, and geographic distributions.

INVESTMENT TEST

Investment Test performance in the state of South Dakota is rated Outstanding. Bank performance in the full-scope Sioux Falls AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Sioux Falls AA)

Bank performance in the full-scope Sioux Falls AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with nine investments totaling \$5.0 million during the evaluation period, plus another 12 qualifying grants totaling \$363 thousand to at least four organizations. The bank also has 20 prior period investments with an aggregate outstanding balance of \$2.5 million. The dollar volume of investments represents 14.5 percent of allocated Tier 1 Capital for the Sioux Falls AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$5 million or 93.3 percent) have this community development purpose and primarily consist of nine bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Sioux Falls AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has six such investments (current and prior period) totaling \$1.1 million. The dollar volume of these investments represents 1 percent of allocated Tier 1 Capital for the state of South Dakota.

Because the bank was responsive to community development needs and opportunities in the Sioux Falls AA, broader statewide investments that provide only indirect benefit were considered and have a neutral impact on performance. Elsewhere in the state, the bank has two investments (current and prior period) totaling \$2.9 million. The dollar volume of these broader statewide investments represents 2.3 percent of allocated Tier 1 Capital for the state of South Dakota.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of South Dakota.

SERVICE TEST

Service Test performance in the state of South Dakota is rated Outstanding. Bank performance in the full-scope Sioux Falls AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Sioux Falls AA)

Bank performance in the Sioux Falls AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Sioux Falls AA. The bank has six branches in moderate-income tracts. There are no low-income geographies in the AA. The distribution of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by excellent ATM distributions in moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Sioux Falls AA based on the bank's relative level of services provided and strong leadership. The bank provided 45 qualified service activities involving 17 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 27 of those activities and more than 800 related service hours. Service activities primarily address affordable housing and community service needs, including financial education. Bank staff provided 18 financial education programs to more than 500 participants, including small businesses, first-time homebuyers, senior citizens, and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of South Dakota. Service performance is consistent/excellent in the Rapid City AA, representing 41 percent of rated area deposits. Service performance is weaker/adequate in the nonmetropolitan AAs, representing 15 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Tennessee

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on good borrower distributions, adequate geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity, responsiveness to an identified community development need for affordable housing, and the additional support of regional investments.
- Good service performance in the full-scope AA based on accessible retail delivery systems (with consideration for adjacent MUI branches) and good CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Tennessee section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Tennessee

The state of Tennessee is the bank's 18th largest rated area based on deposits. It accounts for \$2.5 billion (<1 percent) of bank deposits, 95 (3 percent) of bank branches, 104 (2 percent) of bank ATMs, and 33,527 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has six AAs in this rated area, four of which are metropolitan areas. The two nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Tennessee

We performed a full-scope review of the Nashville AA, which includes nine (of 14) counties in the Nashville-Davidson-Murfreesboro-Franklin MSA as of year-end 2015. Other AAs received limited-scope reviews.

The Nashville AA is the bank's largest AA in this rated area based on deposits. It accounts for \$1.6 billion (67 percent) of rated area deposits, 55 (58 percent) of rated area branches, 59 (57 percent) of rated area ATMs, and 23,637 (71 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 56 percent home mortgage loans, 44 percent business loans, and less than 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Nashville AA.

LENDING TEST

Lending Test performance in the state of Tennessee is rated Outstanding. Bank performance in the full-scope Nashville AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Nashville AA)

Bank performance in the full-scope Nashville AA is excellent based on an excellent level of lending activity, adequate overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Nashville AA reflect excellent responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked sixth of 62 banks in area deposits as of June 30, 2015, with \$1.6 billion deposits and a 3.5 percent deposit market share.
- During the evaluation period, the bank reported \$2.6 billion home mortgage, business, and farm loans in the AA. It also originated \$65 million in CD loans specific to the AA.
- Of all loans reported in the Nashville AA for the year 2015, the bank ranked third in the number of home mortgage loans (fourth by dollar volume), second in the number of business loans (eighth by dollar volume), and second in the number of farm loans (seventh by dollar volume). While home mortgage lending market shares are slightly less than the bank's deposit market share, this is a competitive market with more than 635 home loan reporters. The bank's lending market shares for other products exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Nashville AA is adequate, as evidenced by an adequate distribution of home mortgage loans, a good distribution of business loans, a poor distribution of farm loans, and no unexplained lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Nashville AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is near the demographic comparator. The bank's market share of home purchase loans in low-income geographies exceeds its overall product share for the 2012-2013 period, and is somewhat lower than its overall product share for the 2014-2015 period.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home improvement loans.
 - The geographic distribution of home improvement loans in the 2012-2013 period is adequate overall.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home refinance loans.
 - The geographic distribution of home refinance loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.

- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies equals its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Nashville AA is good. Our assessment gives more weight to performance in the 2014-2015 period as it contains a larger share of the bank's reported business loans.

- The geographic distribution of reported business loans in the 2014-2015 period is good overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.
- The geographic distribution of reported business loans in the 2012-2013 period is excellent. The percentage of bank loans in moderate-income geographies essentially equals the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Nashville AA is poor. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- On a consolidated basis (2012-2015), performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies is lower than its overall product share for the year 2015.

- On a consolidated basis (2012-2015), performance in low-income tracts is adequate. The bank reported two farm loans in low-income geographies during this period, despite limited farm lending opportunity (86 farms). The 2015 market share report reflects no farm loans in low-income geographies by other reporting lenders.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Nashville AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Nashville AA is good based on good home refinance, good home improvement, and excellent home purchase distributions.

- The borrower distribution of home purchase loans is excellent. The percentage of bank loans to both low- and moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to both low-and moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Nashville AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than (or near) the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Nashville AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than (or near) the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Nashville AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made nine CD loans totaling \$65.3 million during the evaluation period. By dollar volume, 77 percent of these loans fund revitalization projects, 15 percent provide affordable housing to LMI persons, 6 percent support community services for LMI persons, and the remainder promote economic development. CD loans include a binding commitment to revitalize a moderate-income geography through the construction of a mixed-use facility (multifamily residential housing and retail space) and the creation of employment opportunities. The dollar volume of CD lending represents 65 percent of allocated Tier 1 Capital for the Nashville AA.

Statewide CD lending has a neutral impact on performance. The bank made four CD loans totaling \$10.0 million in the statewide area that provide only indirect benefit to its AAs, but are considered because the bank is responsive to CD needs and opportunities in the Nashville AA. The dollar volume of statewide CD lending represents 3 percent of the allocated Tier 1 Capital for the state of Tennessee.

Regional CD lending has a neutral impact on performance. The bank made one CD loan totaling \$6.6 million in the East South Central Division, which includes the states of Alabama, Kentucky, Mississippi, and Tennessee. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Nashville AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of Kentucky and Tennessee, as well as the multistate metropolitan areas of Cincinnati, Clarksville, and Louisville.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 15,734 loans totaling \$2.2 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 723 percent of allocated Tier 1 Capital for the state of Tennessee.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Tennessee. Lending performance is weaker/good in the Kingsport, Knoxville, and nonmetropolitan AAs, collectively representing 31 percent of rated area deposits. Lending performance is weaker/adequate in the Morristown AA, representing 2 percent of rated area deposits. Weaker performance is attributable to less favorable geographic distributions (Morristown AA) and CD lending.

INVESTMENT TEST

Investment Test performance in the state of Tennessee is rated Outstanding. Bank performance in the full-scope Nashville AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Nashville AA)

Bank performance in the full-scope Nashville AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 25 investments totaling \$34.3 million during the evaluation period, plus another 100 qualifying grants totaling \$371 thousand to at least 32 organizations. At year-end 2015, the bank also has 67 prior period investments with an aggregate outstanding balance of \$17.7 million. The dollar volume of investments represents 26.3 percent of allocated Tier 1 Capital for the Nashville AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$25.2 million or 72.6 percent) serve this need, including:

- Two LIHTCs totaling \$18 million to renovate an apartment community with 264 units affordable to families earning a maximum of 50 to 60 percent of the AMI.
- Eleven LIHTCs totaling \$6.6 million to construct a senior housing complex with 60 units affordable to tenants earning 60 percent or less of the AMI.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has six such investments (current period) totaling \$8 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Tennessee.

Because the bank was responsive to community development needs and opportunities in the Nashville AA, broader statewide and regional investments that provide only indirect benefit were considered and further support performance.

- Elsewhere in the state, the bank has 31 investments (current and prior period) totaling \$37.5 million. The dollar volume of these broader statewide investments represents 12.5 percent of allocated Tier 1 Capital for the state of Tennessee.
- The bank also has 104 regional investments (current and prior period) totaling \$197.8 million, and eight unfunded commitments totaling \$11.8 million, in the East South Central Division, which includes the states of Kentucky and Tennessee. The dollar volume of these regional investments (excluding unfunded commitments) represents 31.1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Clarksville MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Tennessee.

SERVICE TEST

Service Test performance in the state of Tennessee is rated High Satisfactory. Bank performance in the full-scope Nashville AA is good, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Nashville AA)

Bank performance in the Nashville AA is good based on accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are accessible to geographies and individuals of different income levels in the Nashville AA. Our assessment recognizes MUI branches in close proximity to LMI geographies. The bank has two branches in low-income geographies and seven branches in moderate-income geographies. The percentage of branches in both low- and moderate-income tracts is somewhat lower than the percentage of the population respectively residing in each area. However, there are four MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is further supported by overall good ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

Branching activity has not adversely affected access to banking services. The bank opened three branches and closed two branches during the evaluation period. There was one net branch opening in a middle-income geography. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Nashville AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 127 qualified service activities involving 36 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 56 of those activities and more than 1,100 related service hours. Service activities primarily address financial education needs. Bank staff provided 71 financial education programs to more than 1,000 small businesses, first-time homebuyers, and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Tennessee. Service performance is consistent/good in the Knoxville AA, representing 6 percent of rated area deposits. Service performance is stronger/ excellent in the nonmetropolitan AAs, representing 22 percent of rated area deposits. Service performance is weaker/adequate in the Kingsport-Bristol-Bristol and Morristown AAs, collectively representing 6 percent of rated area deposits. Stronger (or weaker) performance is attributable to more (or less) accessible retail delivery systems.

State of Utah

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good performance to excellent. An excellent level of flexible lending in the state further supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to identified community development needs for economic development/small business financing and revitalization/job creation.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems (with emphasis on moderate-income areas) and adequate CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Utah section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Utah

The state of Utah is the bank's 22nd largest rated area based on deposits. It accounts for \$2.0 billion (<1 percent) of bank deposits, 72 (2 percent) of bank branches, 84 (2 percent) of bank ATMs, and 32,108 (2 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has six AAs in this rated area, four of which are metropolitan areas. The two nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Utah

We performed a full-scope review of the Salt Lake AA, which includes one (of two) counties in the Salt Lake City MSA as of year-end 2015. Other AAs received limited-scope reviews.

The Salt Lake AA is the bank's largest AA in this rated area based on deposits. It accounts for \$1.6 billion (81 percent) of rated area deposits, 39 (54 percent) of rated area branches, 49 (58 percent) of rated area ATMs, and 15,645 (49 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 54 percent home mortgage loans and 46 percent business loans. The bank has an insufficient number of reported farm loans in this market for meaningful analysis.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Salt Lake AA.

LENDING TEST

Lending Test performance in the state of Utah is rated Outstanding. Bank performance in the full-scope Salt Lake AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Salt Lake AA)

Bank performance in the full-scope Salt Lake AA is excellent based on an excellent level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Salt Lake AA reflect excellent responsiveness to area credit needs in relation to deposits.

- USB ranked 19th of 44 banks in area deposits as of June 30, 2015, with \$1.6 billion deposits and a 0.3 percent deposit market share.
- During the evaluation period, the bank reported \$2.4 billion home mortgage, business, and farm loans in the AA. It also originated \$104 million in CD loans specific to the AA.
- Of all loans reported in the Salt Lake AA for the year 2015, the bank ranked seventh in the number and dollar volume of home mortgage loans and fifth in the number of business loans (fourth by dollar volume). The bank's lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Salt AA is good, as evidenced by an adequate distribution of home mortgage loans, an excellent distribution of business loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Salt Lake AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The geographic distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase loans.

- The geographic distribution of home purchase loans in the 2012-2013 period is poor overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is significantly below its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is near its overall product share.
- The geographic distribution of home purchase loans in the 2014-2015 period is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home improvement loans.
 - The geographic distribution of home improvement loans in the 2012-2013 period is adequate overall.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies equals the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is very poor. The bank reported no home improvement loans in low-income geographies during the 2012-2013 period. The 2013 market share report reflects a total of 17 home improvement loans in low-income geographies by other lenders.
 - The geographic distribution of home improvement loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home refinance loans.
 - The geographic distribution of home refinance loans in the 2012-2013 period is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.

- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
- Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans in the 2014-2015 period is good overall.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is near its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Salt Lake AA is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Salt Lake AA is adequate, as evidenced by an adequate distribution of home mortgage loans and a good distribution of business loans. Our assessment gives the most weight to home mortgage loans as they account for 54 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Salt Lake AA is adequate based on good home refinance, good home improvement, and poor home purchase distributions.

- The borrower distribution of home purchase loans is poor.
 - The borrower distribution of home purchase loans in the 2012-2013 period is poor overall. Our assessment gives more weight to the moderate-income sector as it contains more families.

- Performance in the moderate-income sector is poor. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is significantly below its overall product share.
- Performance in the low-income sector is very poor. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
- The borrower distribution of home purchase loans in the 2014-2015 period is poor overall.
 - Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
 - Performance in the low-income sector is very poor. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
- The borrower distribution of home improvement loans is good.
 - The borrower distribution of home improvement loans in the 2012-2013 period is good. The percentage of bank loans to both low- and moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to both low- and moderate-income borrowers exceeds its overall product share.
 - The borrower distribution of home improvement loans in the 2014-2015 period is good overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is near its overall product share.
- The borrower distribution of home refinance loans is good.
 - The borrower distribution of home refinance loans in the 2012-2013 period is good overall.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - The borrower distribution of home refinance loans in the 2014-2015 period is good overall.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is near its overall product share.
- Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Salt Lake AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Salt Lake AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 20 CD loans totaling \$103.6 million during the evaluation period. By dollar volume, 97 percent of these loans fund revitalization projects, and the remainder promote economic development or provide affordable housing to LMI persons. CD loans include a construction loan to build a new headquarters facility for a provider of physicians in a low-income geography and a SBA-designated HUBZone. The project brings 1,000 existing employees to the area and creates 500 additional jobs. The dollar volume of CD lending represents 104 percent of allocated Tier 1 Capital for the Salt Lake AA.

Statewide CD lending has a neutral impact on performance. The bank made six CD loans totaling \$58 thousand in the statewide area that provide only indirect benefit to its AAs, but are considered because the bank is responsive to CD needs and opportunities in the Salt Lake AA. The dollar volume of statewide CD lending represents less than 1 percent of the allocated Tier 1 Capital for the state of Utah.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 3,604 loans totaling \$754 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 303 percent of allocated Tier 1 Capital for the state of Utah.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Utah. Lending performance is consistent/excellent in the Provo-Orem AA, representing 4 percent of rated area deposits. Lending performance is weaker/adequate in the Ogden-Clearfield, St. George, and nonmetropolitan AAs, collectively representing 15 percent of rated area deposits. Weaker performance is attributable to less favorable geographic distributions (Ogden-Clearfield and nonmetropolitan AAs) as well as less favorable CD lending.

INVESTMENT TEST

Investment Test performance in the state of Utah is rated Outstanding. Bank performance in the full-scope Salt Lake City AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Salt Lake City AA)

Bank performance in the full-scope Salt Lake City AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 28 investments totaling \$24 million during the evaluation period, plus another 96 qualifying grants totaling \$415 thousand to at least 32 organizations. At year-end 2015, the bank also has 17 prior period investments with an aggregate outstanding balance of \$5.5 million and three unfunded commitments totaling \$1.2 million. The dollar volume of investments (excluding unfunded commitments) represents 14.9 percent of allocated Tier 1 Capital for the Salt Lake City AA.

Investments are particularly responsive to identified community development needs for economic development/small business financing and revitalization/job creation. Most current period investments (\$23.7 million or 96.9 percent) serve these needs, including:

- Eight bonds totaling \$12.2 million that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Salt Lake City AA.
- Two HTCs and three NMTCs totaling \$3.65 million to repurpose a vacant manufacturing warehouse located in a low-income area. The development will create 12 permanent jobs, 13 affordable housing units, as well as work space for artists, nonprofit organizations, and startup companies. All apartments will be affordable to tenants earning 80 percent or less of the AMI, and the move-in ready commercial spaces will have affordable set rent with no common area maintenance fees.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has eight such investments (current and prior period) totaling \$6.7 million. The dollar volume of these investments represents 2.7 percent of allocated Tier 1 Capital for the state of Utah.

Because the bank was responsive to community development needs and opportunities in the Salt Lake City AA, broader statewide investments that provide only indirect benefit were considered and have a neutral impact on performance. Elsewhere in the state, the bank has seven investments (current and prior period) totaling \$5.5 million. The dollar volume of these broader statewide investments represents 2.2 percent of allocated Tier 1 Capital for the state of Utah.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Utah.

SERVICE TEST

Service Test performance in the state of Utah is rated Outstanding. Bank performance in the full-scope Salt Lake City AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Salt Lake City AA)

Bank performance in the Salt Lake City AA is excellent based on readily accessible retail delivery systems and adequate CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Salt Lake City AA. Our assessment is primarily based on performance in moderate-income areas given the sparse population of low-income areas. The bank has one branch in low-income geographies and nine branches in moderate-income geographies. The percentage of branches in low-income tracts is somewhat lower than, and in moderate-income tracts exceeds, the percentage of the population respectively residing in each area. Access is further supported by overall excellent ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in low- and/or moderate-income areas.

Branching activity has not adversely affected access to banking services. The bank opened three branches and closed one branch during the evaluation period. There were two net branch openings in middle-income tracts. Branch hours and services are tailored to the convenience and needs of the AA. Business hours average more than 50 hours per week for both LMI and MUI branches, and a majority of branches are open Saturday. In addition, a larger share of the branches in LMI areas have drive-up facilities and are traditional branches.

Community Development Services

CD service performance is adequate in the Salt Lake City AA based on the bank's relative level of services provided and some demonstrated leadership. The bank provided 92 qualified service activities involving 13 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 31 of those activities, although the average number of related service hours was limited. Service activities primarily address community service needs, including financial education. Bank staff provided 61 financial education programs to more than 1,300 participants, including small businesses, first-time homebuyers, and youth.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Utah. Service performance is consistent/excellent in the Ogden- Clearfield and Provo-Orem AAs, collectively representing 12 percent of rated area deposits. Service performance is weaker/good in the nonmetropolitan AAs, representing 3 percent of rated area deposits. Service performance is weaker/adequate in the St. George AA, representing 4 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Washington

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on adequate borrower distributions, excellent geographic distributions, a good level of lending activity, and an the significantly positive impact of CD lending, which elevates otherwise good performance to excellent. A good level of flexible lending in the state also supports lending performance.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to an identified community development need for affordable housing.
- Excellent service performance in the full-scope AA based on readily accessible retail delivery systems, branching activity that has improved LMI access, and good CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Washington section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Washington

The state of Washington is the bank's 6th largest rated area based on deposits. It accounts for \$13.3 billion (4.8 percent) of bank deposits, 167 (5 percent) of bank branches, 311 (6 percent) of bank ATMs, and 96,338 (6 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 15 AAs in this rated area, 12 of which are metropolitan areas. The three nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Washington

We performed a full-scope review of the Seattle AA, which consists of the entire Seattle-Bellevue-Everett MD. Other AAs received limited-scope reviews.

The Seattle AA is the bank's largest AA in this rated area based on deposits. It accounts for \$8.9 billion (67 percent) of rated area deposits, 68 (41 percent) of rated area branches, 158 (51 percent) of rated area ATMs, and 48,180 (50 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 64 percent business loans and 36 percent home mortgage loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Seattle AA.

LENDING TEST

Lending Test performance in the state of Washington is rated Outstanding. Bank performance in the full-scope Seattle AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Seattle AA)

Bank performance in the full-scope Seattle AA is excellent based on a good level of lending activity, excellent overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. A good level of flexible lending in the state also supports lending performance.

Lending Activity

Lending levels in the Seattle AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked fourth of 49 banks in area deposits as of June 30, 2015, with \$8.9 billion deposits and an 11.1 percent deposit market share.
- During the evaluation period, the bank reported \$6.8 billion home mortgage, business, and farm loans in the AA. It also originated \$446 million in CD loans specific to the AA.
- Of all loans reported in the Seattle AA for the year 2015, the bank ranked seventh in the number of home mortgage loans (sixth by dollar volume), third in the number of business loans (first by dollar volume), and second in the number of farm loans (seventh by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 540 home loan reporters. The bank's lending market shares for other products generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Seattle AA is excellent, as evidenced by good distributions of home mortgage and farm loans, excellent distributions of multifamily and business loans, and no unexplained lending gaps. Our assessment gives the most weight to business and home mortgage loans, as they respectively account for 64 percent and 36 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Seattle AA is good based on good home purchase, good home refinance, and adequate home improvement distributions.

- The geographic distribution of home purchase loans is good. The percentage of bank loans in low-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is near its overall product share. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall product share.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is adequate. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is near its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Seattle AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Seattle AA is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of business loans in low-income geographies is near its overall product share. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies exceeds its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Seattle AA is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Context and market analysis elevate otherwise poor performance in low-income tracts to adequate. While the percentage of bank loans in low-income geographies is lower than the demographic comparator, there is somewhat limited opportunity for farm lending (111 farms). The bank reported two farm loans in low-income geographies over the evaluation period, while other lenders reported a total of 11 loans.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Seattle AA is adequate, as evidenced by a good distribution of home mortgage loans, and adequate distributions of business and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Seattle AA is good based on good home refinance, good home improvement, and adequate home purchase distributions.

- The borrower distribution of home purchase loans is adequate overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Market aggregate analysis elevates otherwise very poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator. Bank performance is better in comparison to (and essentially equals) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers is lower than its overall product share.
 - Performance in the moderate-income sector is poor. The percentage of bank loans to moderate-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home improvement loans is good overall.
 - Market aggregate analysis elevates otherwise poor performance in the low-income sector to adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home improvement lending to low-income borrowers by other lenders. The bank's market share of home improvement loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.

- The borrower distribution of home refinance loans is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Seattle AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Seattle AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Seattle AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 71 CD loans totaling \$445.9 million during the evaluation period. By dollar volume, 51 percent of these loans provide affordable housing to LMI persons (1,888 units created or rehabilitated), 26 percent fund revitalization projects, 22 percent support community services for LMI persons, and the remainder promote economic development. CD loans include financing (as part of a private placement tax exempt bond) to acquire and rehabilitate a LIHTC senior housing complex with 378 units. The project is restricted to seniors and disabled persons earning 60 percent or less of the area median income. The dollar volume of CD lending represents 41 percent of allocated Tier 1 Capital for the Seattle AA.

Statewide CD lending has a neutral impact on performance. The bank made three CD loans totaling \$9.9 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another two CD loans totaling \$1.2 million in the statewide area that provide only indirect benefit, but are considered because the bank is responsive to CD needs and opportunities in the Seattle AA. The combined volume of statewide CD lending represents less than 1 percent of allocated Tier 1 Capital for the state of Washington.

Regional CD lending has a neutral impact on performance. The bank made two CD loans totaling \$12.3 million in the Pacific Division, which includes the states of Alaska, California, Hawaii, Oregon, and Washington. Broader regional lending is considered because the bank is responsive to CD needs and opportunities in the Seattle AA. The dollar volume of regional CD lending represents less than 1 percent of the aggregate allocated Tier 1 Capital for the states of California, Oregon, and Washington, as well as the multistate metropolitan areas of Lewiston and Portland.

Statewide Product Flexibility

The bank uses flexible lending products to serve credit needs. The bank originated 4,744 loans totaling \$1.3 billion statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 80 percent of allocated Tier 1 Capital for the state of Washington.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Washington. Lending performance is consistent/excellent in the Bellingham and Yakima AAs, collectively representing 6 percent of rated area deposits. Lending performance is weaker/adequate in the Wenatchee AA, representing 1 percent of rated area deposits. Lending performance is weaker/good in the nine remaining limited-scope AAs, collectively representing 26 percent of rated area deposits (Bremerton-Silverdale, Kennewick-Richland, Longview, Mount Vernon-Anacortes, Olympia-Tumwater, Spokane-Spokane Valley, Tacoma-Lakewood, Walla Walla, and nonmetropolitan AAs). Weaker performance is attributable to less favorable geographic distributions (Bremerton-Silverdale, Longview, and Wenatchee AAs) and less favorable CD lending (Kennewick-Richland, Mount Vernon-Anacortes, Olympia-Tumwater, Spokane-Spokane Valley, Tacoma-Lakewood, Walla Walla, Wenatchee, and nonmetropolitan AAs).

INVESTMENT TEST

Investment Test performance in the state of Washington is rated Outstanding. Bank performance in the full-scope Seattle AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Seattle AA)

Bank performance in the full-scope Seattle AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with 300 investments totaling \$198.8 million during the evaluation period, plus another 245 qualifying grants and donations totaling \$1.9 million to at least 93 organizations. The bank also has 74 prior period investments with an aggregate outstanding balance of \$33.1 million and three unfunded commitments totaling \$8.0 million. The dollar volume of investments (excluding unfunded commitments) represents 21.5 percent of allocated Tier 1 Capital for the Seattle AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$122.4 million or 61 percent) serve this need, including:

- A \$22.5 million LIHTC to construct an affordable rental complex, which is part of a new mixed-use commercial, residential, and retail development in the heart of Seattle. The project will create 112 units of housing affordable to working families of four earning 60 percent or less of the AMI.
- A \$10.2 million LIHTC to construct a multifamily senior housing facility with 216 units affordable to tenants earning 60 percent or less of the AMI.
- Fifteen LIHTCs totaling \$3.1 million to construct a multifamily senior housing project with 116 apartments affordable to low-income seniors, including those with disabilities or other special needs.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 60 such investments (current and prior period) totaling \$1.8 million. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Washington.

Because the bank was responsive to community development needs and opportunities in the Seattle AA, broader statewide and regional investments that provide only indirect benefit were considered and have a neutral impact on performance.

- Elsewhere in the state, the bank has three investments (current and prior period) totaling \$104 thousand. The dollar volume of these broader statewide investments represents less than 1 percent of allocated Tier 1 Capital for the state of Washington.
- The bank also has 54 regional investments (current and prior period) totaling \$56.1 million, and three unfunded commitments totaling \$68 thousand, in the broader Pacific Division, which includes the states of California, Oregon, and Washington. The dollar volume of these regional investments (excluding funded commitments) represents less than 1 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Portland MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Washington.

SERVICE TEST

Service Test performance in the state of Washington is rated Outstanding. Bank performance in the full-scope Seattle AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Seattle AA)

Bank performance in the Seattle AA is excellent based on readily accessible retail delivery systems and good CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Seattle AA. The bank has five branches in low-income areas and 19 branches in moderate-income areas. The percentage of branches in low- and moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

Branching activity has improved LMI access to banking services. The bank opened seven branches and closed five branches during the evaluation period. There were net openings in low-income tracts (two branches) and middle-income tracts (one branch), plus two net closures in upper-income tracts. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is good in the Seattle AA based on the bank's relative level of services provided and demonstrated leadership. The bank provided 262 qualified service activities involving 37 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 97 of those activities and more than 2,000 related service hours. Service activities address a variety of CD initiatives, including financial education. Bank staff provided 164 financial education programs to nearly 3,900 participants.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Washington. Service performance is consistent/excellent in seven limited-scope AAs, collectively representing 18 percent of rated area deposits (Bremerton-Silverdale, Kennewick-Richland, Longview, Mount Vernon-Anacortes, Olympia-Tumwater, Spokane-Spokane Valley, and Yakima AAs). Service performance is weaker/good in the Bellingham and nonmetropolitan AAs, collectively representing 10 percent of rated area deposits. Service performance is weaker/adequate in the Tacoma-Lakewood, Walla Walla, and Wenatchee AAs, collectively representing 5 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Wisconsin

CRA Rating for the State:	<u>Outstanding</u>
The Lending Test is rated:	Outstanding
The Investment Test is rated:	Outstanding
The Service Test is rated:	Outstanding

The major factors that support this rating include:

- Excellent lending performance in the full-scope AAs based on adequate-to-good borrower distributions, excellent geographic distributions, a good level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good performance to excellent.
- Excellent investment performance in the full-scope AAs based on investment activity and responsiveness to identified community development needs for affordable housing and revitalization/job creation.
- Excellent service performance in the full-scope AAs based on readily accessible retail delivery systems (with consideration for adjacent MUI branches, ATM distributions, and ADS usage in the Milwaukee AA), branching activity that has improved access in the Milwaukee AA, and at least adequate CD service performance.
- Performance differences in the limited-scope areas did not affect state ratings.

Refer to Tables 1-15 in the State of Wisconsin section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Wisconsin

The state of Wisconsin is the bank's 4th largest rated area based on deposits. It accounts for \$30.0 billion (10.7 percent) of bank deposits, 123 (4 percent) of bank branches, 206 (4 percent) of bank ATMs, and 100,911 (6 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has 18 AAs in this rated area, 12 of which are metropolitan areas. The six nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Wisconsin

We performed a full-scope reviews of the Madison and Milwaukee AAs. The Madison AA includes two (of four) counties in the Madison MSA. The Milwaukee AA consists of the entire Milwaukee-Waukesha-West Allis MSA. Other AAs received limited-scope reviews.

The Madison AA is the bank's 2nd largest AA in this rated area based on deposits. It accounts for \$1.6 billion (5 percent) of rated area deposits, 12 (10 percent) of rated area branches, 19 (9 percent) of rated area ATMs, and 13,192 (13 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 74 percent business loans, 25 percent home mortgage loans, and 1 percent farm loans.

The Milwaukee AA is the bank's largest AA in this rated area based on deposits. It accounts for \$26.0 billion (86 percent) of rated area deposits, 53 (43 percent) of rated area branches, 93 (45 percent) of rated area ATMs, and 39,158 (39 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 71 percent business loans, 28 percent home mortgage loans, and less than 1 percent farm loans.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the full-scope AAs.

LENDING TEST

Lending Test performance in the state of Wisconsin is rated Outstanding. Bank performance in the full-scope Madison and Milwaukee AAs is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews

Madison AA

Bank performance in the full-scope Madison AA is excellent based on a good level of lending activity, excellent overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Madison AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked second of 47 banks in area deposits as of June 30, 2015, with \$1.6 billion deposits and a 10.6 percent deposit market share.
- During the evaluation period, the bank reported \$966 million home mortgage, business, and farm loans in the AA. It also originated \$34 million in CD loans specific to the AA.
- Of all loans reported in the Madison AA for the year 2015, the bank ranked eighth in the number of home mortgage loans (ninth by dollar volume), first in the number and dollar volume of business loans, and fourth in the number of farm loans (eighth by dollar volume). While home mortgage lending market shares are less than the bank's deposit market share, this is a competitive market with more than 385 home loan reporters. The bank's lending market shares for other products generally exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Madison AA is excellent, as evidenced by an adequate distribution of home mortgage loans, excellent distributions of business and farm loans, and no unexplained lending gaps. Our assessment gives the most weight to business and farm loans, which collectively represent 75 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Madison AA is adequate based on adequate home refinance, good home purchase, and excellent home improvement distributions. Our assessment gives the most weight to home refinance and home purchase loans, as these products respectively account for 60 percent and 36 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is good overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase loans.
 - The geographic distribution of home purchase loans in the 2012-2013 period is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies is near its overall product share. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of home purchase loans in low-income geographies is somewhat lower than its overall product share.
 - The geographic distribution of home purchase loans in the 2014-2015 period is excellent. The percentage of bank loans in both low- and moderate-income geographies essentially equals or exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies essentially equals or exceeds its overall product share.
- The geographic distribution of home improvement loans is excellent overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home improvement loans.
 - The geographic distribution of home improvement loans in the 2012-2013 period is excellent overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
 - Performance in low-income tracts is good. The percentage of bank loans in low-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is exceeds its overall product share.
 - The geographic distribution of home improvement loans in the 2014-2015 period is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.

- Performance in moderate-income tracts is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in low-income geographies is lower than its overall product share.
- The geographic distribution of home refinance loans is adequate overall.
 - The geographic distribution of home refinance loans in the 2012-2013 period is poor overall.
 - Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall product share.
 - Performance in low-income tracts is very poor. The percentage of bank loans in low-income geographies is significantly below the demographic comparator, and the bank's market share of home refinance loans in low-income geographies is significantly below its overall product share.
 - The geographic distribution of home refinance loans in the 2014-2015 period is good.
 - Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is near the demographic comparator, and the bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise adequate performance in low-income tracts to good. The percentage of bank loans in low-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Madison AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in both low- and moderate-income geographies exceeds or is near its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans in the Madison AA is excellent. Our assessment is based on performance in moderate-income geographies as there is essentially no lending opportunity in low-income geographies (seven farms). Our assessment also gives more weight to the 2014-2015 period as it contains a larger share of the bank's reported farm loans.

- The geographic distribution of reported farm loans in the 2014-2015 period is excellent. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of reported farm loans in the 2012-2013 period is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Madison AA is adequate, as evidenced by adequate distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Madison AA is adequate based on adequate home purchase, home improvement, and home refinance distributions.

- The borrower distribution of home purchase loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home purchase loans.
 - The borrower distribution of home purchase loans in the 2012-2013 period is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is lower than its overall product share.
 - The borrower distribution of home purchase loans in the 2014-2015 period is good overall.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is near its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home improvement loans.
 - The borrower distribution of home improvement loans in the 2012-2013 period is adequate overall.

- Performance in the low-income sector is very poor. The percentage of bank loans to low-income borrowers is significantly below the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers is lower than its overall product share.
- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is near its overall product share.
- The borrower distribution of home improvement loans in the 2014-2015 period is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is lower than its overall product share.
- The borrower distribution of home refinance loans is adequate overall. Our assessment gives more weight to performance in the 2012-2013 period as it contains a larger share of the bank's reported home refinance loans.
 - The borrower distribution of home refinance loans in the 2012-2013 period is adequate overall.
 - Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is somewhat lower than its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers essentially equals the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers somewhat lower than its overall product share.
 - The borrower distribution of home refinance loans in the 2014-2015 period is good overall. Our assessment gives more weight to the low-income sector as it contains more families.
 - Performance in the low-income sector is good. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is adequate. The percentage of bank loans to moderate-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is lower than its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Madison AA is adequate. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Madison AA is adequate. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Madison AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 15 CD loans totaling \$34.2 million during the evaluation period. By dollar volume, 80 percent of these loans fund revitalization projects, and 20 percent provide affordable housing to LMI persons. CD loans include a construction loan to acquire and construct a 48-unit LIHTC housing facility with all units allocated to tenants earning 60 percent or less of the area median income. The dollar volume of CD lending represents 34 percent of allocated Tier 1 Capital for the Madison AA.

Milwaukee AA

Bank performance in the full-scope Milwaukee AA is excellent based on a good level of lending activity, excellent overall geographic distributions, good overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent.

Lending Activity

Lending levels in the Milwaukee AA reflect good responsiveness to area credit needs in relation to deposits and the competitive banking environment. Our assessment also considers the large volume of centralized nonlocal deposits the bank attributes to this market.

- USB ranked first of 52 banks in area deposits as of June 30, 2015, with \$26.0 billion deposits and a 40.5 percent deposit market share. The bank would still have a first-place deposit rank excluding the large volume of centralized nonlocal deposits (\$15.4 billion), but its deposit market share would be 22 percent.
- During the evaluation period, the bank reported \$2.9 billion home mortgage, business, and farm loans in the AA. It also originated \$261 million in CD loans specific to the AA.
- Of all loans reported in the Milwaukee AA for the year 2015, the bank ranked fourth in the number of home mortgage loans (fifth dollar volume), first in the number business loans (second by dollar volume), and first in the number of farm loans (second by dollar volume). Lending market shares are less than the bank's deposit market share due to the large volume of centralized nonlocal deposits. Additionally, this market is competitive for home mortgage lending (more than 470 reporters) and business/farm lending (at least 105 reporters).

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Milwaukee AA is excellent, as evidenced by good distributions of home mortgage and farm loans, excellent distributions of multifamily and business loans, and no unexplained lending gaps. Our assessment gives the most weight business and home mortgage loans, as they respectively account for 71 percent and 28 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Milwaukee AA is good based on excellent home purchase, adequate home improvement, and good home refinance distributions.

- The geographic distribution of home purchase loans is excellent. The percentage of bank loans in both low- and moderate-income geographies essentially equals or exceeds the demographic comparator, and the bank's market share of home purchase loans in both low- and moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is adequate overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Performance in moderate-income tracts is poor. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is lower than its overall product share.
 - Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies essentially equals the demographic comparator, and the bank's market share of home improvement loans in low-income geographies exceeds its overall product share.
- The geographic distribution of home refinance loans is good overall. Our assessment gives more weight to performance in moderate-income geographies as they contain more owner-occupied housing units.
 - Market aggregate analysis elevates otherwise adequate performance in moderate-income tracts to good. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and equals) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies exceeds its overall product share.
 - Market aggregate analysis elevates otherwise poor performance in low-income tracts to adequate. The percentage of bank loans in low-income geographies is significantly below the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in low-income geographies by other lenders. The bank's market share of home refinance loans in low-income geographies exceeds its overall product share.

Multifamily Loans

The overall geographic distribution of multifamily loans reported in the Milwaukee AA is excellent. The percentage of bank loans in both low- and moderate-income geographies exceeds the demographic comparator.

Small Loans to Businesses

The overall geographic distribution of reported business loans in the Milwaukee AA is excellent based on additional market analysis, which elevates otherwise adequate performance to excellent. Market share reports reflect that of all reporting lenders, the bank reported the most business loans in both low- and moderate-income geographies during the evaluation period.

The geographic distribution of reported business loans in the Milwaukee AA is adequate. Our assessment gives more weight to performance in moderate-income geographies as they contain more businesses.

- Performance in moderate-income tracts is adequate. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of business loans in moderate-income geographies is near its overall product share.
- Performance in low-income tracts is poor. The percentage of bank loans in low-income geographies is lower than the demographic comparator, and the bank's market share of business loans in low-income geographies is somewhat lower than its overall product share.

Small Loans to Farms

The overall geographic distribution of reported farm loans is good. Our assessment gives more weight to performance in moderate-income geographies as they contain more farms.

- Performance in moderate-income tracts is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of farm loans in moderate-income geographies exceeds its overall product share.
- Performance in low-income tracts is excellent. The percentage of bank loans in low-income geographies exceeds the demographic comparator, and the bank's market share of farm loans in low-income geographies exceeds its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Milwaukee AA is good, as evidenced by good distributions of home mortgage, business, and farm loans.

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Milwaukee AA is good based on good home refinance, good home improvement, and excellent home purchase distributions.

- The borrower distribution of home purchase loans is excellent.
 - Consideration for the area's shortage of affordable housing stock and market aggregate performance elevates otherwise good performance in the low-income sector to excellent. The percentage of bank loans to low-income borrowers is near the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home purchase lending to low-income borrowers by other lenders. The bank's market share of home purchase loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home improvement loans is good.
 - Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home improvement lending to low-income borrowers by other lenders. The bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is good.
 - Market aggregate analysis elevates otherwise adequate performance in the low-income sector to good. The percentage of bank loans to low-income borrowers is lower than the demographic comparator. Bank performance is better in comparison to (and exceeds) the aggregate percentage of home refinance lending to low-income borrowers by other lenders. The bank's market share of home refinance loans to low-income borrowers exceeds its overall product share.
 - Performance in the moderate-income sector is good. The percentage of bank loans to moderate-income borrowers is near the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers exceeds its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Milwaukee AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Small Loans to Farms

The distribution of reported loans to farms of different sizes in the Milwaukee AA is good. The percentage of loans to small farms (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small farms exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Milwaukee AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made 35 CD loans totaling \$260.6 million during the evaluation period. By dollar volume, 74 percent of these loans fund revitalization projects, 14 percent support community services for LMI persons, 6 percent promote economic development, and the remainder provide affordable housing to LMI persons. The dollar volume of CD lending represents 8 percent of allocated Tier 1 Capital for the Milwaukee AA.

CD loans include:

- Participation in a syndicated construction loan to redevelop a warehouse in a designated redevelopment area into a retail center and hotel. The project will reuse underutilized buildings, develop retail and restaurant space, create new jobs, and promote further development.
- Participation in a multi-bank loan to construct a hotel in a low-income geography, which is also a SBA-designated HUBZone and a Milwaukee Renewal Community. The project will create more than 100 new jobs.

Statewide Community Development Lending

Statewide CD lending has a neutral impact on performance. The bank made three CD loans totaling \$15.6 million in the statewide area that have a purpose, mandate, or function to directly serve its AAs. The bank made another eight CD loans totaling \$19.9 million in the statewide area that provide only indirect benefit, but are considered because the bank is responsive to CD needs and opportunities in the full-scope AAs. The combined volume of statewide CD lending represents less than 1 percent of allocated Tier 1 Capital for the state of Wisconsin.

Product Flexibility

Product flexibility has a neutral impact on performance. The bank uses flexible lending products to serve credit needs. The bank originated 5,650 loans totaling \$853 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 23 percent of allocated Tier 1 Capital for the state of Wisconsin.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Lending Test rating for the state of Wisconsin. Lending performance is consistent/excellent in the Oshkosh-Neenah and Racine AAs, collectively representing 1 percent of rated area deposits. Lending performance is weaker/adequate in the Green Bay and Wausau AAs, collectively representing 1 percent of rated area deposits. Lending performance is weaker/good in the seven remaining limited-scope AAs, collectively representing 6 percent of rated area deposits (Appleton, Eau Claire, Fond du Lac, Janesville-Beloit, LaCrosse-Onalaska, Sheboygan, and nonmetropolitan AAs). Weaker performance is primarily attributable to less favorable CD lending; geographic distributions are also less favorable in the Wausau AA.

INVESTMENT TEST

Investment Test performance in the state of Wisconsin is rated Outstanding. Bank performance in the full-scope Madison and Milwaukee AAs is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in both full-scope AAs is excellent in relation to bank capacity, identified needs, and available investment opportunities. Our assessment also gives consideration for the bank's large volume of centralized, non-local deposits in the Milwaukee AA (as described in the Lending Activity and Market Profile sections).

Madison AA

USB demonstrated an excellent level of investment activity with 35 investments totaling \$31.9 million during the evaluation period, plus another 74 qualifying grants totaling \$477 thousand to at least 25 organizations. At year-end 2015, the bank also has 25 prior period investments with an aggregate outstanding balance of \$4.0 million. The dollar volume of investments represents 18.1 percent of allocated Tier 1 Capital for the Madison AA.

Investments are particularly responsive to an identified community development need for affordable housing. Most current period investments (\$21.6 million or 66.7 percent) serve this need, including:

- Twenty-three LIHTCs totaling \$6.4 million to construct an affordable, independent senior living facility with 56 units. The project is part of a campus consisting of a total of 135 units designed for senior independent living, assisted living, and memory care. All independent living units are affordable to seniors earning 60 percent or less of the AMI.
- A \$5.8 million LIHTC to construct an affordable, supportive housing complex targeting homeless persons. Fifty-four (of 60) units are under Section 8 vouchers, and the remaining six units are reserved for tenants earning 30 percent or less of the AMI. Tenants also benefit from a comprehensive package of supportive services.
- A \$7.3 million LIHTC to construct a multifamily housing project with 48 units. All units are affordable to tenants earning 30 to 60 percent of the AMI, with eight units reserved for homeless persons.

Milwaukee AA

USB demonstrated an excellent level of investment activity with 298 investments totaling \$157.6 million during the evaluation period, plus another 277 qualifying grants and donations totaling \$4.2 million to at least 83 organizations. The bank also has 70 prior period investments with an aggregate outstanding balance of \$48.5 million and three unfunded commitments totaling \$11 thousand. The dollar volume of investments (excluding unfunded commitments) represents 6.6 percent of allocated Tier 1 Capital for the Milwaukee AA.

Investments are particularly responsive to identified community development needs for affordable housing and revitalization/job creation. Most current period investments (\$155.3 million or 96 percent) serve these needs, including:

- A \$6.5 million LIHTC to convert a vacant historic warehouse into affordable housing for working families. Sixty-one units (of 72) are restricted to tenants earning 30 to 60 percent of the AMI.
- Thirty-nine LIHTCs totaling \$9.8 million to construct an affordable, supportive housing project with 37 units for persons who are homeless or at risk of homelessness.
- A \$3 million NMTC to construct a commercial building that will house an affordable fresh foods grocery and parking garage in a distressed neighborhood and SBA-designated HUBZone. The development is projected to create 85 full-time jobs.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has 21 such investments (current and prior period) totaling \$2.5 million. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Wisconsin.

Because the bank was responsive to community development needs and opportunities in the full-scope AAs, broader statewide and regional investments that provide only indirect benefit were considered and have a neutral impact on performance.

- Elsewhere in the state, the bank has 49 investments (current and prior period) totaling \$52.1 million, and one unfunded commitment totaling \$26 thousand. The dollar volume of these broader statewide investments (excluding unfunded commitments) represents 1.4 percent of allocated Tier 1 Capital for the state of Wisconsin.
- The bank also has 99 regional investments (current and prior period) totaling \$106.8 million, and four unfunded commitments totaling \$10.5 million, in the broader East North Central Division, which includes the states of Illinois, Indiana, Ohio, and Wisconsin. The dollar volume of these regional investments (excluding unfunded commitments) represents 1.8 percent of the aggregate allocated Tier 1 Capital in the aforementioned states and the Chicago MMA.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas and consistent with the Outstanding Investment Test rating for the state of Wisconsin.

SERVICE TEST

Service Test performance in the state of Wisconsin is rated Outstanding. Bank performance in the full-scope Madison and Milwaukee AAs is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews

Madison AA

Bank performance in the Madison AA is excellent based on readily accessible retail delivery systems and adequate CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Madison AA. The bank has one branch in low-income geographies and three branches in moderate-income geographies. The percentage of branches in low- and moderate-income tracts exceeds the percentage of the population respectively residing in each area. Access is further supported by excellent ATM distributions in both low- and moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is adequate in the Madison AA based on the bank's relative level of services provided and some demonstrated leadership. The bank provided 56 qualified service activities involving 21 different organizations during the evaluation period. Leadership is evident through Board or committee participation in 32 of those activities, although the average number of related service hours was limited. Service activities primarily address community service needs, including financial education. Bank staff provided 24 financial education programs to nearly 300 participants.

Milwaukee AA

Bank performance in the Milwaukee AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Milwaukee AA. Our assessment recognizes MUI branches in close proximity to LMI geographies and positively considers ATM distributions and ADS usage. The bank has four branches in low-income geographies and seven branches in moderate-income geographies. The percentage of branches in low-income tracts is somewhat lower than, and in moderate-income tracts is near, the percentage of the population respectively residing in each area. However, there are eight MUI branches in close proximity to LMI geographies (across street or within blocks), which improve the bank's access to both low- and moderate-income areas. Access is expanded by overall good ATM distributions in LMI areas, as well as the availability and demonstrated usage of the call center, interactive voice response, and ATMs by customers residing in LMI areas.

Branching activity has improved access to banking services. The bank opened seven branches and closed no branches during the evaluation period. Branches were opened in moderate-income tracts (two branches), middle-income tracts (two branches), and upper-income tracts (three branches). We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Milwaukee AA based on the bank's high level of services provided, strong leadership, and responsiveness to an identified community need for financial education. The bank provided 430 qualified service activities involving 86 different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 191 of those activities and more than 2,700 related service hours.

Service activities are primarily responsive to financial education and other community service needs. Service activity examples during the evaluation period include:

- A bank employee provided nearly 100 service hours as a four-year board member (including one year as Chair) of an organization dedicated to helping residents transform distressed neighborhoods into healthy sustainable communities.
- A bank employee provided nearly 80 service hours as a four-year board member (including one year as Vice President) of an organization that provides education, advocacy, and supportive services to help residents achieve successful homeownership.
- Bank staff provided 239 financial education programs to more than 5,500 participants, including homebuyer education, foreclosure prevention, small business seminars, and youth programs.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Wisconsin. Service performance is consistent/excellent in the Eau Claire, La Crosse-Onalaska, Sheboygan, Wausau, and nonmetropolitan AAs, collectively representing 5 percent of rated area deposits. Service performance is weaker/good in the Appleton, Fond du Lac, Janesville-Beloit, Oshkosh-Neenah, and Racine AAs, collectively representing 2 percent of rated area deposits). Service performance is weaker/adequate in the Green Bay AA, representing 1 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

State of Wyoming

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

The major factors that support this rating include:

- Excellent lending performance in the full-scope AA based on adequate borrower distributions, good geographic distributions, an excellent level of lending activity, and the significantly positive impact of CD lending, which elevates otherwise good performance to excellent. An excellent level of flexible lending in the state further supports lending performance. Weaker lending performance in the limited-scope AAs negatively impacts our assessment and results in an overall good lending performance conclusion for the state.
- Excellent investment performance in the full-scope AA based on investment activity and responsiveness to economic development/small business financing needs. Investment performance was consistent in the limited-scope areas.
- Excellent service performance based on readily accessible retail delivery systems and excellent CD service performance. Service performance differences in the limited-scope areas did not affect the state rating.

Refer to Tables 1-15 in the State of Wyoming section of Appendix D for the facts and data supporting performance conclusions under the Lending, Investment, and Service Tests.

Description of Institution's Operations in the State of Wyoming

The state of Wyoming is the bank's 34th largest rated area based on deposits. It accounts for \$412 million (<1 percent) of bank deposits, 15 (<1 percent) of bank branches, 18 (<1 percent) of bank ATMs, and 7,133 (<1 percent) of bank-reported loans inside its AAs during the evaluation period. The bank has eight AAs in this rated area, two of which are metropolitan areas. The six nonmetropolitan AAs are combined for analysis and presentation. Refer to Appendix A for a detailed listing of bank AAs.

Scope of Evaluation in the State of Wyoming

We performed a full-scope review of the Cheyenne AA, which consists of the entire Cheyenne MSA. Other AAs received limited-scope reviews.

The Cheyenne AA is the bank's largest AA in this rated area based on deposits. It accounts for \$89 million (22 percent) of rated area deposits, two (13 percent) of rated area branches, two (11 percent) of rated area ATMs, and 1,596 (22 percent) of rated area loans. The bank's mix of loans reported in this AA (by number, excluding CD loans) is 66 percent home mortgage loans, 33 percent business loans, and 1 percent farm loans. The bank has an insufficient number of reported farm loans in this market for meaningful analysis.

Refer to the market profile in Appendix C for detailed demographics, community contact information, and other performance context specific to the Cheyenne AA.

LENDING TEST

Lending Test performance in the state of Wyoming is rated High Satisfactory. Bank performance in the full-scope Cheyenne AA is excellent, but weaker performance in limited-scope areas has negative impact and results in an overall good lending performance conclusion for the state.

Conclusions for Areas Receiving Full-Scope Reviews

Bank performance in the full-scope Cheyenne AA is excellent based on an excellent level of lending activity, good overall geographic distributions, adequate overall borrower distributions, and the significantly positive impact of CD lending, which elevates otherwise good lending performance to excellent. An excellent level of flexible lending in the state further supports lending performance.

Lending Activity

Lending levels in the Cheyenne AA reflect excellent responsiveness to area credit needs in relation to deposits and the competitive banking environment.

- USB ranked seventh of 19 banks in area deposits as of June 30, 2015, with \$89 million deposits and a 5.8 percent deposit market share.
- During the evaluation period, the bank reported \$220 million home mortgage, business, and farm loans in the AA. It also originated \$3 million in CD loans specific to the AA.
- Of all loans reported in the Cheyenne AA for the year 2015, the bank ranked fifth in the number and dollar volume of home mortgage loans and sixth in the number of business loans (fourth by dollar volume). While home mortgage lending market shares are slightly less than the bank's deposit market share, this is a competitive market with more than 165 home loan reporters. The bank's business lending market shares exceed its deposit market share.

Distribution of Loans by Income Level of the Geography

The overall geographic distribution of loans in the Cheyenne AA is good, as evidenced by good distributions of home mortgage and business loans, and no lending gaps.

Home Mortgage Loans

The overall geographic distribution of home mortgage loans reported in the Cheyenne AA is good based on good home purchase, adequate home refinance, and very poor home improvement distributions. Our assessment gives the most weight to home purchase and home refinance loans, as these products respectively account for 56 percent and 42 percent of the bank's reported home mortgage loans in this AA (by number).

- The geographic distribution of home purchase loans is good. The percentage of bank loans in moderate-income geographies is somewhat lower than the demographic comparator, and the bank's market share of home purchase loans in moderate-income geographies exceeds its overall product share.
- The geographic distribution of home improvement loans is very poor. The percentage of bank loans in moderate-income geographies is significantly below the demographic comparator, and the bank's market share of home improvement loans in moderate-income geographies is significantly below its overall product share.
- The geographic distribution of home refinance loans is adequate. Market aggregate analysis elevates otherwise poor performance in moderate-income tracts to adequate. The percentage of bank loans in moderate-income geographies is lower than the demographic comparator. Bank performance is better in comparison to (and near) the aggregate percentage of home refinance lending in moderate-income geographies by other lenders. The bank's market share of home refinance loans in moderate-income geographies is lower than its overall product share.

Small Loans to Businesses

The geographic distribution of reported business loans in the Cheyenne AA is good. The percentage of bank loans in moderate-income geographies exceeds the demographic comparator, and the bank's market share of business loans in moderate-income geographies is somewhat lower than its overall product share.

Distribution of Loans by Income Level of the Borrower

The overall borrower distribution of loans in the Cheyenne AA is adequate, as evidenced by an adequate distribution of home mortgage loans and a good distribution of business loans. Our assessment gives the most weight to home mortgage loans as they account for 66 percent of the bank's reported loans in this AA (by number).

Home Mortgage Loans

The overall borrower distribution of home mortgage loans reported in the Cheyenne AA is adequate based on good home purchase, good home improvement, and poor home refinance distributions.

- The borrower distribution of home purchase loans is good overall. Our assessment gives more weight to the moderate-income sector as it contains more families.

- Performance in the moderate-income sector is excellent. The percentage of bank loans to moderate-income borrowers exceeds the demographic comparator, and the bank's market share of home purchase loans to moderate-income borrowers exceeds its overall product share.
- Performance in the low-income sector is poor. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home purchase loans to low-income borrowers is significantly below its overall product share.
- The borrower distribution of home improvement loans is good. The percentage of bank loans to moderate-income borrowers equals the demographic comparator, and the bank's market share of home improvement loans to moderate-income borrowers is lower than its overall product share. The percentage of bank loans to low-income borrowers is somewhat lower than the demographic comparator, and the bank's market share of home improvement loans to low-income borrowers exceeds its overall product share.
- The borrower distribution of home refinance loans is poor overall. Our assessment gives more weight to the moderate-income sector as it contains more families.
 - Performance in the moderate-income sector is poor. The percentage of bank loans to moderate-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to moderate-income borrowers is significantly below its overall product share.
 - Performance in the low-income sector is adequate. The percentage of bank loans to low-income borrowers is lower than the demographic comparator, and the bank's market share of home refinance loans to low-income borrowers is near its overall product share.

Small Loans to Businesses

The distribution of reported loans to businesses of different sizes in the Cheyenne AA is good. The percentage of loans to small businesses (i.e., those with gross annual revenues of \$1 million or less) is somewhat lower than the demographic comparator, and the bank's market share of loans to small businesses exceeds its overall product share.

Community Development Lending

CD lending has a significantly positive impact on lending performance in the Cheyenne AA. The bank demonstrated excellent responsiveness to CD lending needs and opportunities. The bank made eight CD loans totaling \$2.7 million during the evaluation period. By dollar volume, 77 percent of these loans fund revitalization projects, 13 percent promote economic development, 9 percent support community services for LMI persons, and the remainder provide affordable housing to LMI persons. CD loans include a construction-to-permanent loan to expand and relocate a restaurant business to a moderate-income geography. The project retains 30 existing jobs and creates 20 new jobs. The dollar volume of CD lending represents 25 percent of allocated Tier 1 Capital for the Cheyenne AA.

Statewide Product Flexibility

The bank extensively uses flexible lending products to serve credit needs. The bank originated 859 loans totaling \$179 million statewide through the flexible products and programs described in the Executive Summary section (data was not readily available for all programs at the AA level). The dollar volume of flexible lending represents 355 percent of allocated Tier 1 Capital for the state of Wyoming.

Conclusions for Areas Receiving Limited-Scope Reviews

Because the limited-scope areas comprise a significant portion of the bank's deposit base in this state, performance differences in the limited scope AAs did negatively impact our assessment and result in an overall good lending performance conclusion and High Satisfactory Lending Test rating for the state of Wyoming. Lending performance is weaker/adequate in the Casper and nonmetropolitan AAs, collectively representing 78 percent of rated area deposits. Weaker performance is attributable to less favorable CD lending and geographic distributions.

INVESTMENT TEST

Investment Test performance in the state of Wyoming is rated Outstanding. Bank performance in the full-scope Cheyenne AA is excellent, and there were no performance differences in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews (Cheyenne AA)

Bank performance in the full-scope Cheyenne AA is excellent in relation to bank capacity, identified needs, and available investment opportunities.

USB demonstrated an excellent level of investment activity with five investments totaling \$1.2 million during the evaluation period, plus another 19 qualifying grants totaling \$44 thousand to at least seven organizations. The bank also has 11 prior period investments with an aggregate outstanding balance of \$2.5 million. The dollar volume of investments represents 34.0 percent of allocated Tier 1 Capital for the Cheyenne AA.

Investments are particularly responsive to economic development/small business financing needs. Most current period investments (\$1 million or 84.8 percent) have this community development purpose, consisting of four bonds that provide funding for SBA guaranteed/insured 504 Certified Development Loans to small businesses in the Cheyenne AA.

Statewide investments with a purpose, mandate, or function to directly serve the bank's AAs have a neutral impact on performance. The bank has four such investments (current period) totaling \$27 thousand. The dollar volume of these investments represents less than 1 percent of allocated Tier 1 Capital for the state of Wyoming.

Conclusions for Areas Receiving Limited-Scope Reviews

Investment performance is excellent in all limited-scope areas are consistent with the Outstanding Investment Test rating for the state of Wyoming.

SERVICE TEST

Service Test performance in the state of Wyoming is rated Outstanding. Bank performance in the full-scope Cheyenne AA is excellent, and performance differences in the limited-scope AAs did not impact the rating.

Conclusions for Areas Receiving Full-Scope Reviews (Cheyenne AA)

Bank performance in the Cheyenne AA is excellent based on readily accessible retail delivery systems and excellent CD service performance.

Retail Banking Services

Retail delivery systems are readily accessible to geographies and individuals of different income levels in the Cheyenne AA. The bank has two branches in the AA, one of which is located in a moderate-income area. There are no low-income geographies in the AA. The distribution of branches in moderate-income tracts exceeds the percentage of the population residing there. Access is further supported by excellent ATM distributions in moderate-income areas.

There was no branching activity in this AA during the evaluation period. We did not identify any branch differences in product availability, services offered, or business hours that inconvenience LMI geographies or individuals.

Community Development Services

CD service performance is excellent in the Cheyenne AA based on the bank's relative level of services provided and strong leadership. The bank provided 13 qualified service activities involving four different organizations during the evaluation period. Strong leadership is evident through Board or committee participation in 12 of those activities and approximately 275 related service hours. Service activities primarily address community service needs.

Conclusions for Areas Receiving Limited-Scope Reviews

Performance differences in the limited-scope AAs did not impact the Service Test rating for the state of Wyoming. Service performance is consistent/excellent in the nonmetropolitan AAs, representing 66 percent of rated area deposits. Service performance is weaker/good in the Casper AA, representing 13 percent of rated area deposits. Weaker performance is attributable to less accessible retail delivery systems.

Appendix A: Scope of Evaluation

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

Time Period Reviewed	January 1, 2012 through December 31, 2015 – with consideration for community development activities (loans, investments, and services) from April 1, 2012 through December 31, 2015.		
Financial Institution		Products Reviewed	
U.S. Bank National Association (USB)		Home Mortgage Loans Small Loans to B u sinesses and Farms Community Development Loans, Investments, and Services	
Affiliate(s)		Products Reviewed	
U.S. Bancorp Community Development Corporation U.S. Bancorp Community Investment Corporation U.S. Bank Foundation (formerly known as U.S. Bancorp Foundation) Mississippi Valley Company U.S. Bank National Association ND (merged with USB)		Community Development Investments Community Development Investments Community Development Investments Community Development Service Home Mortgage Loans and Small Loans to Businesses (2012)	
List of Assessment Areas and Type of Evaluation			
Assessment Area	MSA/ MD #	Evaluation Type	Counties in Delineated AA
Multistate Rating Areas			
Chicago-Naperville-Elgin, IL-IN-WI MMA			
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	16974	FS	Cook, DuPage, Kane, Kendall, McHenry, and Will Counties IL
Chicago-Naperville-Arlington Heights, IL MD 2014-2015			Ditto, less Kane County IL
Elgin, IL MD 2014-2015	20994	LS	Kane County IL
Lake County–Kenosha County, IL–WI MD	29404	LS	Lake County IL; Kenosha County WI
Cincinnati, OH–KY–IN MSA	17140	FS	Dearborn County IN; Boone, Bracken, Campbell, Kenton, and Pendleton Counties KY; Brown, Butler, Clermont, Hamilton, and Warren Counties OH
Clarksville, TN–KY MSA	17300	FS	Christian County KY; Montgomery County TN
Davenport–Moline–Rock Island, IA–IL MSA	19340	FS	Scott County IA; Henry and Rock Island Counties IL
Fargo, ND–MN MSA	22020	FS	Cass County ND; Clay County MN
Grand Forks, ND–MN MSA	24220	FS	Grand Forks County ND; Polk County MN
Kansas City, MO–KS MSA	28140	FS	Johnson and Wyandotte Counties KS; Cass, Clay, Clinton, Jackson, Lafayette, Platte, and Ray Counties MO
Lewiston, ID–WA MSA	30300	FS	Nez Perce County ID; Asotin County WA
Logan, UT–ID MSA	30860	FS	Franklin County ID; Cache County UT
Louisville/Jefferson County, KY–IN MSA	31140	FS	Clark and Floyd Counties IN; Bullitt, Jefferson, and Shelby Counties KY

Minneapolis–St. Paul-Bloomington, MN–WI MSA	33460	FS	
Minneapolis–St. Paul-Bloomington, MN–WI MSA 2012-2013			Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Ramsey, Scott, Sherburne, Washington, and Wright Counties MN; St. Croix County WI
Minneapolis–St. Paul-Bloomington, MN–WI MSA 2014-2015			Ditto, plus Mille Lacs County MN
Omaha-Council Bluffs, NE–IA MSA	36540	FS	Pottawattamie County IA; Cass, Douglas, Sarpy, and Washington Counties NE
Portland–Vancouver-Hillsboro, OR–WA MSA	38900	FS	Clackamas, Columbia, Multnomah, Washington, and Yamhill Counties OR; Clark County WA
St. Louis, MO–IL MSA	41180	FS	
St. Louis, MO–IL MSA 2012-2013			Clinton, Macoupin, Madison, Monroe, and St. Clair Counties IL; Franklin, Jefferson, Lincoln, St. Charles, St. Louis, St. Louis City, Warren, and Washington Counties MO
St. Louis, MO–IL MSA 2014-2015			Ditto, less Washington County MO
State Rating Areas			
State of Arizona (AZ)			
Phoenix-Mesa-Scottsdale, AZ MSA	38060	FS	Maricopa and Pinal Counties
Lake Havasu City-Kingman, AZ MSA	29420	LS	Mohave County
Prescott, AZ MSA	39140	LS	Yavapai County
Tucson, AZ MSA	46060	LS	Pima County
State of Arkansas (AR)			
Little Rock-North Little Rock-Conway, AR MSA	30780	FS	Faulkner, Grant, Perry, Pulaski, and Saline Counties
Fort Smith, AR-OK MSA	22900	LS	Crawford County AR
Hot Springs, AR MSA	26300	LS	Garland County
AR NonMSA Total	NA	LS	Baxter, Clark, Cleburne, Conway, Hot Spring, and Marion Counties
State of California (CA)			
Los Angeles-Long Beach-Glendale, CA MD	31084	FS	Los Angeles County
Sacramento-Arden Arcade-Roseville, CA MSA	40900	FS	El Dorado, Placer, Sacramento, and Yolo Counties
Anaheim-Santa Ana-Irvine, CA MD	11244	LS	Orange County
Bakersfield, CA MSA	12540	LS	Kern County
Chico, CA MSA	17020	LS	Butte County
Modesto, CA MSA	33700	LS	Stanislaus County
Napa, CA MSA	34900	LS	Napa County
Oakland-Haywood-Berkeley, CA MD	36084	LS	Alameda and Contra Costa Counties
Oxnard-Thousand Oaks-Ventura, CA MSA	37100	LS	Ventura County
Redding, CA MSA	39820	LS	Shasta County
Riverside-San Bernardino-Ontario, CA MSA	40140	LS	Riverside and San Bernardino Counties
Salinas, CA MSA	41500	LS	Monterey County
San Diego-Carlsbad-San Marcos, CA MSA	41740	LS	San Diego County
San Francisco (SF)-Redwood City-South SF, CA MD 2012-2013	41884	LS	Marin, San Francisco, and San Mateo Counties
San Francisco (SF)-Redwood City-South SF, CA MD 2014-2015			Ditto, less Marin County
San Jose-Sunnyvale-Santa Clara, CA MSA	41940	LS	Santa Clara County

San Luis Obispo-Paso Robles-Arroyo Grande, CA MSA	42020	LS	San Luis Obispo County
San Rafael, CA MD 2014-2015	42034	LS	Marin County
Santa Cruz-Watsonville, CA MSA	42100	LS	Santa Cruz County
Santa Maria-Santa Barbara, CA MSA	42200	LS	Santa Barbara County
Santa Rosa, CA MSA	42220	LS	Sonoma County
Stockton-Lodi, CA MSA	44700	LS	San Joaquin County
Vallejo-Fairfield, CA MSA	46700	LS	Solano County
Yuba City, CA MSA	49700	LS	Sutter and Yuba Counties
CA NonMSA Total	NA	LS	Calaveras, Colusa, Del Norte, Glenn, Humboldt, Lassen, Mendocino, Modoc, Nevada, Plumas, Siskiyou, Tehama, and Tuolumne Counties
State of Colorado (CO)			
Denver-Aurora-Lakewood, CO MSA	19740	FS	Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson Counties
Boulder, CO MSA	14500	LS	Boulder County
Colorado Springs, CO MSA	17820	LS	El Paso County
Fort Collins, CO MSA	22660	LS	Larimer County
Grand Junction, CO MSA	24300	LS	Mesa County
Greeley, CO MSA	24540	LS	Weld County
Pueblo, CO MSA	39380	LS	Pueblo County
CO NonMSA Total	NA	LS	Delta, Eagle, Fremont, Garfield, Grand, Montrose, Otero, Pitkin, San Miguel, and Summit Counties
State of Florida (FL)			
West Palm Beach-Boca Raton-Delray Beach, FL MD	48424	FS	Palm Beach County
Naples-Immokalee-Marco Island, FL MSA	34940	LS	Collier County
State of Idaho (ID)			
Boise City, ID MSA	14260	FS	Ada, Canyon, Gem, and Owyhee Counties
Coeur d'Alene, ID MSA	17660	LS	Kootenai County
Idaho Falls, ID MSA	26820	LS	Bonneville and Jefferson Counties
Pocatello, ID MSA 2012-2013	38540	LS	Bannock and Power Counties
Pocatello, ID MSA 2014-2015			Ditto, less Power County
ID NonMSA Total 2012-2013	NA	LS	Adams, Bear Lake, Benewah, Bingham, Blaine, Bonner, Camas, Caribou, Cassia, Clearwater, Custer, Elmore, Gooding, Idaho, Jerome, Latah, Lemhi, Lewis, Madison, Minidoka, Oneida, Payette, Shoshone, Teton, Twin Falls, Valley, and Washington Counties
ID NonMSA Total 2014-2015			Ditto, plus Power County
State of Illinois (IL)			
Springfield, IL MSA	44100	FS	Sangamon County
Bloomington, IL MSA	14060	LS	McLean County
Carbondale-Marion, IL MSA 2014-2015	16060	LS	Williamson County
Rockford, IL MSA	40420	LS	Winnebago County

IL NonMSA Total 2012-2013	NA	LS	Christian, Clay, Coles, Franklin, Jefferson, Jo Daviess, Lee, Marion, Morgan, Stephenson, Union, Whiteside, and Williamson Counties
IL NonMSA Total 2014-2015			Ditto, less Williamson County
State of Indiana (IN)			
IN NonMSA (Eastern Indiana)	NA	FS	Fayette, Randolph, and Wayne Counties
State of Iowa (IA)			
Cedar Rapids, IA MSA	16300	FS	Benton and Linn Counties
Ames, IA MSA	11180	LS	Story County
Des Moines-West Des Moines, IA MSA	19780	LS	Dallas, Polk, and Warren Counties
Dubuque, IA MSA	20220	LS	Dubuque County
Iowa City, IA MSA	26980	LS	Johnson and Washington Counties
Sioux City, IA-NE-SD MSA	43580	LS	Woodbury County IA
Waterloo-Cedar Falls, IA MSA	47940	LS	Black Hawk County
IA NonMSA Total	NA	LS	Appanoose, Boone, Cedar, Cerro Gordo, Clay, Clinton, Des Moines, Dickinson, Hamilton, Henry, Humboldt, Iowa, Jackson, Jasper, Keokuk, Lucas, Lyon, Mahaska, Marion, Marshall, Monona, Montgomery, Muscatine, O'Brien, Osceola, Ringgold, Sioux, Wapello, and Wayne Counties
State of Kansas (KS)			
Lawrence, KS MSA	29940	FS	Douglas County
Topeka, KS MSA	45820	LS	Shawnee County
KS NonMSA (Pittsburg)	NA	LS	Crawford County
State of Kentucky (KY)			
Bowling Green, KY MSA 2012-2013	14540	FS	Warren County
Bowling Green, KY MSA 2014-2015			Ditto, plus Allen County
Evansville, IN-KY MSA	21780	LS	Henderson County KY
Lexington-Fayette, KY MSA	30460	LS	Fayette County
Owensboro, KY MSA	36980	LS	Daviess, Hancock, and McLean Counties
KY NonMSA Total 2012-2013	NA	LS	Allen, Barren, Boyle, Calloway, Carroll, Estill, Fleming, Floyd, Graves, Hopkins, Logan, Madison, Marion, Marshall, Mason, McCracken, Monroe, Pike, Rowan, Simpson, and Washington Counties
KY NonMSA Total 2014-2015			Ditto, less Allen County
State of Minnesota (MN)			
Duluth, MN-WI MSA	20260	FS	Carlton and St. Louis Counties MN
Mankato-North Mankato, MN MSA	31860	LS	Blue Earth County
Rochester, MN MSA	40340	LS	Olmstead County
St. Cloud, MN MSA	41060	LS	Benton and Stearns Counties
MN NonMSA Total 2012-2013	NA	LS	Cass, Crow Wing, Douglas, Freeborn, Itasca, Kandiyohi, Lyon, Martin, Mille Lacs, Morrison, Mower, Otter Tail, Pine, Redwood, and Steele Counties
MN NonMSA Total 2014-2015			Ditto, less Mille Lacs County
State of Missouri (MO)			
Springfield, MO MSA	44180	FS	Christian, Dallas, Greene, Polk, and Webster Counties
Cape Girardeau, MO-IL MSA	16020	LS	Bollinger and Cape Girardeau Counties MO
Columbia, MO MSA	17860	LS	Boone County
Fayetteville-Springdale-Rogers, AR-MO MSA	22220	LS	McDonald County MO

Jefferson City, MO MSA	27620	LS	Cole County
Joplin, MO MSA	27900	LS	Jasper and Newton Counties
St. Joseph, MO-KS MSA	41140	LS	Andrew, Buchanan, and DeKalb Counties MO
MO NonMSA Total 2012-2013	NA	LS	Adair, Atchison, Audrain, Barry, Barton, Butler, Camden, Chariton, Dent, Grundy, Henry, Hickory, Howell, Johnson, Laclede, Lawrence, Linn, Macon, Marion, Mercer, Miller, Montgomery, Morgan, New Madrid, Nodaway, Perry, Pettis, Phelps, Pike, Pulaski, Randolph, Ripley, St. Francois, Ste. Genevieve, Scotland, Scott, Shelby, Stoddard, Stone, Taney, Vernon, and Wright Counties
MO NonMSA 2014-2015			Ditto, plus Washington County
State of Montana (MT)			
Billings, MT MSA	13740	FS	Yellowstone County
Great Falls, MT MSA	24500	LS	Cascade County
Missoula, MT MSA	33540	LS	Missoula County
MT NonMSA Total	NA	LS	Chouteau, Custer, Dawson, Flathead, Gallatin, Hill, Lewis and Clark, Liberty, Ravalli, Silver Bow, and Toole Counties
State of Nebraska (NE)			
Lincoln, NE MSA	30700	FS	Lancaster County
Grand Island, NE MSA 2014-2015	24260	LS	Hall County
NE NonMSA Total 2012-2013	NA	LS	Adams, Buffalo, Butler, Dodge, Gage, Hall, Lincoln, Madison, Platte, and Scotts Bluff Counties
NE NonMSA Total 2014-2015			Ditto, less Hall County
State of Nevada (NV)			
Las Vegas-Henderson-Paradise, NV MSA	29820	FS	Clark County
Carson City, NV MSA	16180	LS	Carson City County
Reno, NV MSA	39900	LS	Washoe County
NV NonMSA Total	NA	LS	Churchill, Douglas, Elko, Humboldt, Lyon, and Nye Counties
State of New Mexico (NM)			
Albuquerque, NM MSA	10740	FS	Bernalillo, Sandoval, Torrance, and Valencia Counties
Las Cruces, NM MSA	29740	LS	Dona Ana County
Santa Fe, NM MSA	42140	LS	Santa Fe County
NM NonMSA Total	NA	LS	Cibola, Curry, McKinley, Roosevelt, and Taos Counties
State of North Dakota (ND)			
Bismarck, ND MSA	13900	FS	Burleigh and Morton Counties
ND NonMSA Total	NA	LS	Barnes, Cavalier, Mercer, Ramsey, Ransom, Richland, Stark, Stutsman, Walsh, Ward, and Williams Counties
State of Ohio (OH)			
Cleveland-Elyria, OH MSA	17460	FS	Cuyahoga, Geauga, Lake, Lorain, and Medina Counties
Columbus, OH MSA 2012-2013	18140	FS	Delaware, Fairfield, Franklin, Licking, Morrow, and Pickaway Counties
Columbus, OH MSA 2014-2015			Ditto, plus Hocking, Perry, and Union Counties

Akron, OH MSA	10420	LS	Portage and Summit Counties
Canton-Massillon, OH MSA	15940	LS	Carroll and Stark Counties
Dayton, OH MSA 2012-2013	19380	LS	Greene, Miami, Montgomery, and Preble Counties
Dayton, OH MSA 2014-2015			Ditto, less Preble County
Huntington-Ashland, WV-KY-OH MSA	26580	LS	Lawrence County OH
Lima, OH MSA	30620	LS	Allen County
Mansfield, OH MSA	31900	LS	Richland County
Sandusky, OH MSA 2012-2013	41780	LS	Erie County
Springfield, OH MSA	44220	LS	Clark County
Toledo, OH MSA 2012-2013	45780	LS	Ottawa County
Weirton-Steubenville, WV-OH MSA	48260	LS	Jefferson County OH
Youngstown-Warren-Boardman, OH-PA MSA	49660	LS	Mahoning and Trumbull Counties OH
OH NonMSA Total 2012-2013	NA	LS	Ashtabula, Auglaize, Crawford, Darke, Fayette, Gallia, Guernsey, Hardin, Harrison, Highland, Hocking, Perry, Pike, Sandusky, Scioto, Seneca, Shelby, Tuscarawas, Van Wert, and Wayne Counties
OH NonMSA Total 2014-2015			Ditto, less Hocking and Perry Counties, and plus Erie, Preble, and Ottawa Counties
State of Oregon (OR)			
Salem, OR MSA	41420	FS	Marion and Polk Counties
Eastern OR NonMSA 2012-2013	NA	FS	Baker, Crook, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Linn, Malheur, Umatilla, Union, and Wasco Counties
Eastern OR NonMSA 2014-2015			Ditto, less Linn County
Albany, OR MSA 2014-2015	10540	LS	Linn County
Bend-Redmond, OR MSA	13460	LS	Deschutes County
Corvallis, OR MSA	18700	LS	Benton County
Eugene, OR MSA	21660	LS	Lane County
Grants Pass, OR MSA 2014-2015	24420	LS	Josephine County
Medford, OR MSA	32780	LS	Jackson County
Other OR NonMSA Total 2012-2013	NA	LS	Clatsop, Coos, Curry, Douglas, Josephine, Lincoln, and Tillamook Counties
Other OR NonMSA Total 2014-2015			Ditto, less Josephine County
State of South Dakota (SD)			
Sioux Falls, SD MSA	43620	FS	Lincoln and Minnehaha Counties
Rapid City, SD MSA	39660	LS	Pennington County
SD NonMSA Total	NA	LS	Brown, Davison, and Hughes Counties
State of Tennessee (TN)			
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2012-2013	34980	FS	Cheatham, Davidson, Dickson, Robertson, Rutherford, Sumner, Williamson, and Wilson Counties
Nashville-Davidson-Murfreesboro-Franklin, TN MSA 2014-2015			Ditto, plus Maury County
Kingsport-Bristol-Bristol, TN-VA MSA	28700	LS	Hawkins County TN

Knoxville, TN MSA 2012-2013	28940	LS	Blount and Knox Counties
Knoxville, TN MSA 2014-2015			Ditto, plus Roane County
Morristown, TN MSA	34100	LS	Hamblen and Jefferson Counties
TN NonMSA Total 2012-2013	NA	LS	Bedford, Cocke, Coffee, Cumberland, Franklin, Lincoln, Maury, Putnam, Roane, Servier, Warren, and White Counties
TN NonMSA Total 2014-2015			Ditto, less Maury and Roane Counties
State of Utah (UT)			
Salt Lake City, UT MSA 2012-2013	41620	FS	Salt Lake and Summit Counties
Salt Lake City, UT MSA 2014-2015			Ditto, less Summit County
Ogden-Clearfield, UT MSA 2012-2013	36260	LS	Davis and Weber Counties
Ogden-Clearfield, UT MSA 2014-2015			Ditto, plus Box Elder County
Provo-Orem, UT MSA	39340	LS	Utah County
St. George, UT MSA	41100	LS	Washington County
UT NonMSA Total 2012-2013	NA	LS	Box Elder, Iron, and Wasatch Counties
UT NonMSA Total 2014-2015			Ditto, less Box Elder County, and plus Summit County
State of Washington (WA)			
Seattle-Bellevue-Everett, WA MD	42644	FS	King and Snohomish Counties
Bellingham, WA MSA	13380	LS	Whatcom County
Bremerton-Silverdale, WA MSA	14740	LS	Kitsap County
Kennewick-Richland, WA MSA	28420	LS	Benton and Franklin Counties
Longview, WA MSA	31020	LS	Cowlitz County
Mount Vernon-Anacortes, WA MSA	34580	LS	Skagit County
Olympia-Tumwater, WA MSA	36500	LS	Thurston County
Spokane-Spokane Valley, WA MSA	44060	LS	Spokane County
Tacoma-Lakewood, WA MD	45104	LS	Pierce County
Walla Walla, WA MSA 2014-2015	47460	LS	Walla Walla County
Wenatchee, WA MSA	48300	LS	Chelan County
Yakima, WA MSA	49420	LS	Yakima County
WA NonMSA Total 2012-2013	NA	LS	Adams, Clallam, Garfield, Grant, Grays Harbor, Island, Jefferson, Kittitas, Lincoln, Okanogan, Walla Walla, and Whitman Counties
WA NonMSA Total 2014-2015			Ditto, less Walla Walla County
State of Wisconsin (WI)			
Madison, WI MSA	31540	FS	Columbia and Dane Counties
Milwaukee-Waukesha-West Allis, WI MSA	33340	FS	Milwaukee, Ozaukee, Washington, and Waukesha Counties
Appleton, WI MSA	11540	LS	Calumet and Outagamie Counties
Eau Claire, WI MSA	20740	LS	Chippewa and Eau Claire Counties
Fond du Lac, WI MSA	22540	LS	Fond du Lac County
Green Bay, WI MSA	24580	LS	Brown County

Janesville-Beloit, WI MSA	27500	LS	Rock County
La Crosse-Onalaska, WI-MN MSA	29100	LS	La Crosse County WI
Oshkosh-Neenah, WI MSA	36780	LS	Winnebago County
Racine, WI MSA	39540	LS	Racine County
Sheboygan, WI MSA	43100	LS	Sheboygan County
Wausau, WI MSA	48140	LS	Marathon County
WI NonMSA Total	NA	LS	Adams, Barron, Burnett, Dodge, Green Lake, Manitowoc, Marquette, Oneida, Polk, Portage, Vilas, Walworth, Washburn, Waushara, and Wood Counties
State of Wyoming (WY)			
Cheyenne, WY MSA	16940	FS	Laramie County
Casper, WY MSA	16220	LS	Natrona County
WY NonMSA Total	NA	LS	Albany, Campbell, Fremont, Goshen, Park, Sheridan, Sweetwater, Teton, Unita, and Washakie Counties

Appendix B: Ratings Summary

U.S. Bank National Association CRA Ratings				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
U.S. Bank National Association	Outstanding	Outstanding	Outstanding	Outstanding
Multistate Metropolitan Rated Areas:				
Chicago-Naperville-Elgin, IL-IN-WI	Outstanding	Outstanding	High Satisfactory	Outstanding
Cincinnati, OH-KY-IN	Outstanding	Outstanding	Outstanding	Outstanding
Clarksville, TN-KY	High Satisfactory	Outstanding	Outstanding	Outstanding
Davenport-Moline-Rock Island, IA-IL	Outstanding	Outstanding	High Satisfactory	Outstanding
Fargo, ND-MN	Outstanding	Outstanding	Outstanding	Outstanding
Grand Forks, ND-MN	Outstanding	Outstanding	High Satisfactory	Outstanding
Kansas City, MO-KS	Outstanding	Outstanding	High Satisfactory	Outstanding
Lewiston, ID-WA	Outstanding	Outstanding	Outstanding	Outstanding
Logan, UT-ID	Outstanding	Outstanding	High Satisfactory	Outstanding
Louisville/Jefferson County, KY-IN	Outstanding	Outstanding	Outstanding	Outstanding
Minneapolis-St. Paul-Bloomington, MN-WI	Outstanding	Outstanding	Outstanding	Outstanding
Omaha-Council Bluffs, NE-IA	Outstanding	Outstanding	Outstanding	Outstanding
Portland-Vancouver-Hillsboro, OR-WA	Outstanding	Outstanding	Outstanding	Outstanding
St. Louis, MO-IL	Outstanding	Outstanding	Outstanding	Outstanding
State Rated Areas:				
Arizona	Outstanding	Outstanding	High Satisfactory	Outstanding
Arkansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Colorado	Outstanding	Outstanding	Outstanding	Outstanding
Florida	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Idaho	High Satisfactory	Outstanding	Outstanding	Outstanding
Illinois	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	Outstanding	Outstanding

Iowa	Outstanding	Outstanding	Outstanding	Outstanding
Kansas	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Minnesota	High Satisfactory	Outstanding	Outstanding	Outstanding
Missouri	High Satisfactory	Outstanding	Outstanding	Outstanding
Montana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Nebraska	Outstanding	Outstanding	High Satisfactory	Outstanding
Nevada	Outstanding	Outstanding	High Satisfactory	Outstanding
New Mexico	Outstanding	Outstanding	Outstanding	Outstanding
North Dakota	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Ohio	Outstanding	Outstanding	Outstanding	Outstanding
Oregon	High Satisfactory	Outstanding	Outstanding	Outstanding
South Dakota	High Satisfactory	Outstanding	Outstanding	Outstanding
Tennessee	Outstanding	Outstanding	High Satisfactory	Outstanding
Utah	Outstanding	Outstanding	Outstanding	Outstanding
Washington	Outstanding	Outstanding	Outstanding	Outstanding
Wisconsin	Outstanding	Outstanding	Outstanding	Outstanding
Wyoming	High Satisfactory	Outstanding	Outstanding	Outstanding

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

Appendix C: Community Profiles for Full-Scope Areas

Chicago MMA: Chicago Assessment Area

2012-2013: Demographic Information for Full Scope Area: Chicago Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,830	13.39	23.83	31.53	30.98	0.27
Population by Geography	7,727,924	9.14	23.77	33.53	33.56	0.00
Owner-Occupied Housing by Geography	1,865,203	4.00	18.06	37.39	40.55	0.00
Business by Geography	546,099	4.96	15.94	32.66	46.32	0.12
Farms by Geography	8,225	2.54	12.68	39.96	44.78	0.04
Family Distribution by Income Level	1,849,276	22.65	16.83	19.43	41.09	0.00
Distribution of LMI Families throughout AA Geographies	730,021	16.13	34.21	32.76	16.89	0.00
Median Family Income (2010)		\$72,747	Median Housing Value (2010)			\$289,293
Adjusted Median Family Income (2013)		\$73,400	MD Unemployment Rate (2013)			9.3%
2014-2015: Demographic Information for Full Scope Area: Chicago Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	1,748	13.79	22.88	31.69	31.35	0.29
Population by Geography	7,212,655	9.64	22.55	33.95	33.86	0.00
Owner-Occupied Housing by Geography	1,734,014	4.23	16.89	37.75	41.14	0.00
Business by Geography	419,115	4.79	15.11	32.01	47.94	0.14
Farms by Geography	6,507	2.89	11.68	39.66	45.75	0.02
Family Distribution by Income Level	1,721,828	22.78	16.66	19.30	41.26	0.00
Distribution of LMI Families throughout AA Geographies	679,155	17.04	32.56	33.25	17.15	0.00
Median Family Income (2010)		\$72,196	Median Housing Value (2010)			\$291,356
Adjusted Median Family Income (2015)		\$77,700	MMA Gross Median Rent (2015)			\$1,033
Families Below Poverty Level (2015)		9.63%	MD Unemployment Rate (2015)			5.9%

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

Source: US Census, FFIEC, and Bureau of Labor Statistics (not seasonally adjusted).

The Chicago AA consists of five (of six) counties in the Chicago-Naperville-Arlington Heights, IL MD (Chicago MD). The area includes Cook, DuPage, Kendall, McHenry, and Will Counties in northeast Illinois. Grundy County is not included in the AA as it is located on the outer edge of a large MD. The OMB removed Kane County from the Chicago MD as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Chicago MD is part of the larger Chicago-Naperville-Elgin, IL-IN-WI MMA, which is the third largest metropolitan area in the U.S. (by population). The current MMA population is estimated at 7.34 million with less than 1 percent growth since the 2010 Census. The MMA recently experienced its first population loss in over 20 years - and the largest loss of any major metropolitan area in the country. The MMA has suffered from persistent out-migration in recent years, which is partly due to taxes, political issues, and high crime rates. The population is projected to continue declining, with the MMA losing its third-place rank by 2020.

The banking environment is very competitive, and the high level of competition is a contextual consideration for this AA. There are 174 banks with 2,244 offices in the Chicago AA as of June 30, 2015. The RBS Citizens acquisition in 2014 nearly doubled USB's presence in the AA, and the bank now has a tenth place deposit rank with \$10.1 billion deposits, a 3 percent deposit market share, 160 branches, and 215 ATMs. JPMorgan Chase (JPMC) has the largest share of area deposits (24 percent), followed by BMO Harris (13 percent), Bank of America (12 percent), and The Northern Trust Company (9 percent). All other financial institutions have deposit market shares less than 4 percent.

The local economy is very large, diversified, and continues to recover. Economic drivers are finance, logistics, and tourism. Chicago is an economic hub for the Midwest, serving as a transportation and distribution center for many businesses. It is also a major financial center and home to the largest futures exchange in the world (Chicago Mercantile Exchange). The area benefits from strong tourism for its renowned museums, local events, and other attractions, including Navy Pier, Willis Tower, and Millennium Park. There are a number of Global 500 and more than 30 FORTUNE 500 companies in the greater Chicago area, including Boeing, Archer Daniels Midland, Walgreens, United Continental Holdings, and Allstate. Major employers include the Advocate Health Care System, University of Chicago, JPMorgan Chase & Co., Northwestern Memorial Healthcare, Walgreen Co., United Continental Holdings Inc., and AT&T.

Chicago job growth is slow and less broad-based compared to other large metropolitan areas in the country. Although the current unemployment rate (5.9 percent) has improved significantly since 2012 (9.4 percent), Chicago still has the highest unemployment rate among metropolitan areas with more than two million residents. Chicago also suffers from severe state and local budgetary pressures, which are expected to hurt businesses and residents alike as property taxes rise.

Home value appreciation is meager in Chicago, ranking last among major U.S. cities. This has contributed to higher rates of negative home equity. Approximately 20 percent of homeowners currently owe more to lenders than their home is worth. After peaking in 2007, home values bottomed out in 2012 before beginning to slowly increase. The foreclosure rate in the Chicago metropolitan area (0.14 percent) is higher than the state of Illinois (0.12 percent) and more than double the national rate (0.06 percent). In addition, the foreclosure rate in Cook County is nearly triple the national rate (0.17 percent).

The OCC relied on community contacts with three local housing organizations to better understand area credit needs and opportunities for bank involvement. The contacts spoke of needs for affordable housing stock, affordable home rehabilitation programs to repair foreclosed properties, more homeownership and financial counseling programs, and participation by large financial institutions in loan pools targeting LMI areas.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include capacity building for nonprofit organizations, job creation/placement to offset high unemployment, affordable housing for purchase or rent by LMI persons, and financing for small businesses/farms.

There are significant opportunities to meet credit and community development needs in the Chicago AA. Chicago is an urban renewal community as well as an Urban Round I Empowerment Zone, which makes it eligible for various grants, business tax credits, bonding authority, and other benefits. There are six enterprise zones in the area, which offer state and local tax incentives to stimulate economic growth and neighborhood revitalization. There are 29 CDFIs in the metropolitan area consisting of depository institutions, loan funds, and a venture capital fund. Additionally, there are more than 500 designated Brownfield sites, primarily within Cook County (concentrated in the downtown area) and the city's South side. These designations typically allow financial support and/or incentives for specific economic development efforts.

Cincinnati MMA: Cincinnati Assessment Area

2012-2013 Demographic Information for Full Scope Area: Cincinnati Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	488	12.30	23.36	40.57	22.95	0.82
Population by Geography	2,067,685	6.87	19.74	43.98	28.84	0.56
Owner-Occupied Housing by Geography	545,002	3.06	16.51	47.74	32.70	0.00
Business by Geography	164,296	5.80	20.88	41.09	32.17	0.06
Farms by Geography	5,256	1.83	15.89	57.50	24.75	0.04
Family Distribution by Income Level	524,688	20.81	17.22	21.15	40.81	0.00
Distribution of LMI Families throughout AA Geographies	199,587	11.67	28.50	44.89	14.93	0.01
Median Family Income (2010)		\$67,515	Median Housing Value (2010)			\$161,647
Adjusted Median Family Income (2013)		\$68,700	MMA Unemployment Rate (2013)			7.3%
2014-2015 Demographic Information for Full Scope Area: Cincinnati Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	488	11.48	23.98	39.75	23.98	0.82
Population by Geography	2,067,685	6.40	19.96	43.18	29.89	0.56
Owner-Occupied Housing by Geography	545,002	2.81	16.53	46.62	34.04	0.00
Business by Geography	131,240	5.39	21.16	39.99	33.40	0.06
Farms by Geography	4,409	1.81	15.01	55.84	27.33	0.00
Family Distribution by Income Level	524,688	20.59	17.10	21.11	41.20	0.00
Distribution of LMI Families throughout AA Geographies	197,776	11.00	29.03	44.27	15.70	0.01
Median Family Income (2010)		\$67,016	Median Housing Value (2010)			\$161,647
Adjusted Median Family Income (2015)		\$72,400	Fair Market Two-Bedroom Rent (2015)			\$769
Families Below Poverty Level (2015)		8.70%	MMA Unemployment Rate (2015)			4.5%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Cincinnati AA consists of 11 (of 15) counties in the Cincinnati, OH-KY-IN MMA (Cincinnati MMA). The area includes: Brown, Butler, Clermont, Hamilton, and Warren Counties in Ohio; Boone, Bracken, Campbell, Kenton, and Pendleton Counties in Kentucky; and Dearborn County in Indiana. Gallatin and Grant Counties in Kentucky, and Franklin and Ohio Counties in Indiana, are not included as they are generally located on the outer edges of a very large MMA. The Cincinnati AA delineation did not change during the evaluation period, but OMB changes in other portions of the Cincinnati MMA produced slight demographic changes. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Cincinnati MMA is the 28th largest metropolitan area in the U.S. and the largest in the state of Ohio. The current population for the MMA is estimated at 2.16 million with 2 percent growth since the 2010 Census. The MMA population is projected to increase at a similar pace and reach 2.22 million by 2020.

The banking environment is very competitive. There are 65 banks with 747 offices in the Cincinnati AA as of June 30, 2015. USB has a first place deposit rank with \$38.9 billion deposits, a 43 percent deposit market share, 118 branches, and 149 ATMs. A significant portion of the deposits that USB attributes to this AA (\$18.5 billion or 48 percent) are non-local deposits that have been centralized for administrative purposes. The bank's level of local deposits (\$20.4 billion) is a contextual consideration for this AA. Fifth Third Bank is the only other financial institution with a significant deposit market share (31 percent). All other financial institutions have deposit market shares of 7 percent or less.

The local economy continues to recover and is diverse. Manufacturing, financial services, and healthcare are economic drivers. Cincinnati continues to outperform most other metropolitan areas in the state of Ohio and many elsewhere in the Midwest. The area benefits from a highly educated workforce, a diversified industrial base, and the presence of ten FORTUNE 500 companies and three Global 500 companies. Major area employers include the Kroger Company, the University of Cincinnati, the Cincinnati Children's Hospital, TriHealth Inc., and Procter & Gamble.

Recent economic growth in professional and financial services, healthcare, and nondurable goods manufacturing has spurred area employment. The current unemployment rate (4.5 percent) has improved since 2012 (7.4 percent), and compares favorably to the statewide rates for Ohio (4.9 percent) and Kentucky (5.4 percent). The tightening labor market is driving up wages and home values. While home values are rebounding, the local housing market is still affected by an above-average level of foreclosure inventory.

The OCC conducted two community contacts and relied on another recent contact to better understand area credit needs and opportunities for bank involvement. The contacts included economic development, affordable housing, and social service representatives. Contacts expressed needs for affordable housing, financial education/counseling, and job training.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include job creation/placement to offset unemployment, capacity building for nonprofit organizations, affordable housing for LMI persons, economic revitalization, financing for small businesses and farms, and financial products targeted to underserved/underbanked populations.

There are significant opportunities to meet credit and community development needs in the Cincinnati AA. The area has numerous community-based nonprofit organizations and eight CDFIs. Additionally, there is an Empowerment Zone for several areas in Cincinnati, an Urban Renewal Community for portions of Butler County, and an abundance of designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development efforts.

Clarksville MMA: Clarksville Assessment Area

2012-2015 Demographic Information for Full Scope Area: Clarksville Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	58	3.45	18.97	58.62	13.79	5.17
Population by Geography	246,286	2.27	18.08	60.08	17.84	1.72
Owner-Occupied Housing by Geography	53,957	1.35	11.81	60.67	26.17	0.00
Business by Geography	12,438	5.97	19.05	55.68	18.54	0.76
Farms by Geography	730	1.64	13.01	57.67	27.53	0.14
Family Distribution by Income Level	62,488	20.24	18.24	22.08	39.44	0.00
Distribution of LMI Families throughout AA Geographies	24,043	3.32	27.54	57.70	11.44	0.00
Median Family Income (2010)		\$51,407	Median Housing Value (2010)			\$115,843
Adjusted Median Family Income (2015)		\$55,400	Fair Market Two-Bedroom Rent (2015)			\$781
Families Below Poverty Level (2015)		12.43%	MMA Unemployment Rate (2015)			5.9%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Clarksville AA consists of two (of three) counties in the Clarksville TN-KY, MMA (Clarksville MMA). The area includes Christian County in Kentucky and Montgomery County in Tennessee. Trigg County, Kentucky is not included as the entire MSA is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Clarksville MMA is the 166th largest metropolitan area in the U.S. The current population for the MMA is estimated at 281 thousand with 8 percent growth since the 2010 Census. The MMA's above-average population growth is partly due to its proximity to Nashville and more favorable cost of living for commuters. The MMA population is projected to increase at a similar pace and reach 300 thousand by 2020.

The banking environment is moderately competitive. There are 14 banks with 74 offices in the Clarksville AA as of June 30, 2015. USB has a fourth place deposit rank with \$309 million deposits and a 10 percent deposit market share. USB also has 12 branches in this market (more than any other bank) and 15 ATMs. Financial institutions with the largest share of area deposits are Planters Bank, Inc. (19 percent), F&M Bank (12 percent), and First Advantage Bank (10 percent). Other competitors have deposit market shares less than 8 percent.

The local economy is expanding, but ranks among the least diverse in the U.S. Manufacturing and a local military base are the primary economic drivers. Fort Campbell is the area's largest employer with nearly 35 thousand military personnel. Automotive parts manufacturing accounts for nearly one fourth of the area's factory jobs. Manufacturing performance has been strong in recent years, although the number of jobs began decreasing in early 2015, with more manufacturing jobs lost in the area than anywhere else in the state of Tennessee. Other major employers include Wal-Mart Stores Inc., Trane Co., Gateway Health System, and Quebecor. The current unemployment rate (5.9 percent) has improved since 2012 (8.1 percent), but remains above the statewide rates for Kentucky (5.4 percent) and Tennessee (5.6 percent).

The OCC conducted a community contact with a local affordable housing and economic development representative to better understand area credit needs and opportunities for bank involvement. The contact expressed a significant need for affordable home lending programs. The contact was of the opinion there are few affordable mortgage financing options in the area besides VA (Veterans Affairs) loans. The contact also stated that downtown Clarksville was devastated by a tornado in 2006, and that economic development is still needed as many lots remain vacant.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable housing for LMI persons, and economic revitalization (including financing), and/or economic development planning.

There are several opportunities to meet credit and community development needs in the Clarksville AA. The area has numerous community-based and regional nonprofit organizations. Additionally, there are several designated Brownfield sites in the area.

Davenport MMA: Davenport Assessment Area

2012-2015 Demographic Information for Full Scope Area: Davenport Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	100	8.00	21.00	51.00	20.00	0.00
Population by Geography	363,256	5.07	17.73	53.92	23.28	0.00
Owner-Occupied Housing by Geography	105,667	2.44	14.82	57.19	25.56	0.00
Business by Geography	22,348	8.84	14.10	48.59	28.47	0.00
Farms by Geography	1,608	0.81	5.10	66.42	27.67	0.00
Family Distribution by Income Level	94,292	20.02	18.42	21.80	39.77	0.00
Distribution of LMI Families throughout AA Geographies	36,245	7.97	24.52	53.78	13.73	0.00
Median Family Income (2010)		\$61,723	Median Housing Value (2010)			\$125,644
Adjusted Median Family Income (2015)		\$69,000	Fair Market Two-Bedroom Rent (2015)			\$710
Families Below Poverty Level (2015)		8.6%	MMA Unemployment Rate (2015)			5.6%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Davenport AA consists of three (of four) counties in the Davenport- Moline-Rock Island-MMA (Davenport MMA). The area includes Henry and Rock Island Counties in Illinois and Scott County in Iowa. Mercer County, Illinois is not included as it is located on the outer edge of a large MMA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Davenport MMA, also known as the Quad Cities, is the 137th largest metropolitan area in the U.S and the third largest in the state of Iowa. The current population for the MMA is estimated at 384 thousand with only 1 percent growth since the 2010 Census. The MMA population is projected to decline slightly in coming years due to an aging population and poor migration trends.

The banking environment is moderately competitive. There are 34 banks with 137 offices in the Davenport AA as of June 30, 2015. USB has a fourth place deposit rank with \$605 million deposits, an 8 percent deposit market share, 11 branches, and 17 ATMs. Wells Fargo Bank has the largest share of area deposits (15 percent), followed by Quad City Bank (13 percent), and Blackhawk Bank & Trust (11 percent). All other financial institutions have deposit market shares of 7 percent or less.

The local economy weakened late in the evaluation period. Key sectors of the economy, including manufacturing, were impacted by declines in farming and construction that reduced the demand for machinery. The area also suffers from below-average educational attainment and per capita income. Rock Island (one of the Quad Cities) is relatively resilient to economic downturns due to a military base, which is the area's largest employer. Other major employers include John Deere & Company, Genesis Health Systems, and HNI Corp. The area is home to one FORTUNE 500 and Global 500 company (John Deere).

Area unemployment (5.6 percent) remains higher than the statewide rate for Iowa (3.7 percent) and the national average (5.3 percent), but has declined over the last several years and remains below the statewide rate for Illinois (5.9 percent).

The OCC relied on a community contact with an affordable housing organization and a community development listening session held in Davenport to better understand area credit needs and opportunities for bank participation. Contacts expressed a need for affordable housing, particularly within inner-city Davenport. Other community needs include micro-and small business lending and development, small dollar consumer loans, access to low-cost bank accounts and services, financial education, and first-time homebuyer counseling and down payment assistance.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include job creation/placement to offset unemployment, financing and technical assistance for small businesses/farms, and economic revitalization and/or economic development planning.

There are several opportunities to meet credit and community development needs in the Davenport AA. The area has numerous community-based nonprofit organizations, as well as a CDFI in Moline. An Empowerment Zone exists for several cities in the area, and there are several designated Brownfield sites along the Mississippi River. These designations typically allow financial support and/or incentives for specific economic development efforts.

Fargo MMA: Fargo Assessment Area

2012-2015 Demographic Information for Full Scope Area: Fargo Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	46	4.35	15.22	60.87	19.57	0.00
Population by Geography	208,777	4.49	12.80	56.35	26.36	0.00
Owner-Occupied Housing by Geography	49,149	0.69	9.77	62.54	26.99	0.00
Business by Geography	15,460	3.35	20.19	52.06	24.39	0.00
Farms by Geography	1,139	0.26	4.83	74.71	20.19	0.00
Family Distribution by Income Level	48,919	18.15	17.92	24.84	39.09	0.00
Distribution of LMI Families throughout AA Geographies	17,646	4.62	17.75	61.66	15.97	0.00
Median Family Income (2010)		\$67,695	Median Housing Value (2010)			\$146,683
Adjusted Median Family Income (2015)		\$76,600	Fair Market Two-Bedroom Rent (2015)			\$715
Families Below Poverty Level (2015)		6.16%	Unemployment Rate (2015)			2.4%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Fargo AA consists of the entire Fargo ND-MN MMA (Fargo MMA). The area includes Cass County in North Dakota and Clay County in Minnesota. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Fargo MMA is the 192nd largest metropolitan area in the U.S. and the largest in the state of North Dakota. The area has experienced above-average population growth in recent years due to in-migration related to a state oil boom. The current population is estimated at 234 thousand with 12 percent growth since the 2010 Census. The population is projected to grow at a slower pace and reach 245 thousand by 2020.

The banking environment is competitive. There are 27 banks with 92 offices in the Fargo AA as of June 30, 2015. USB has a third place deposit rank with \$539 million deposits, an 8 percent deposit market share, seven branches, and 25 ATMs. Bell State Bank & Trust has the largest share of area deposits (35 percent), followed by Wells Fargo Bank (14 percent). All other financial institutions have deposit market shares of 5 percent or less.

The local economy has slowed considerably, but is relatively diverse. Economic drivers are energy, logistics, and financial services. The area benefits from relatively low business costs, ample affordable housing, and a well-educated population. Major employers include Sanford Health, North Dakota State University, and Essentia Health. Local employment continues to grow despite falling oil prices. The unemployment rate (2.4 percent) is among the lowest in the nation and compares favorably to the statewide rates for North Dakota (2.7 percent) and Minnesota (3.7 percent).

The OCC relied on a recent community contact with a local community development representative to better understand area credit needs and opportunities for bank participation. The contact stated the largest issues facing low-income persons are homelessness, access to public transit, and access to credit for immigrants. The contact also mentioned that a lack of federal funding hinders assistance for LMI residents.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable housing for purchase or rent by LMI persons, and economic revitalization and/or economic development planning.

There are several opportunities to meet credit and community development needs in the Fargo AA. The city of Fargo has a Consolidated Plan to address community needs, including housing and services for homeless persons. The area also has numerous community-based nonprofit organizations, one CDFI, and several designated Brownfield sites.

Grand Forks MMA: Grand Forks Assessment Area

2012-2015 Demographic Information for Full Scope Area: Grand Forks Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	3.57	17.86	67.86	10.71	0.00
Population by Geography	98,461	5.29	16.88	65.76	12.07	0.00
Owner-Occupied Housing by Geography	23,556	0.49	17.23	67.34	14.94	0.00
Business by Geography	6,930	2.29	19.34	66.77	11.60	0.00
Farms by Geography	1,071	0.19	12.04	81.89	5.88	0.00
Family Distribution by Income Level	22,957	19.55	18.31	24.20	37.94	0.00
Distribution of LMI Families throughout AA Geographies	8,691	2.65	22.85	67.97	6.54	0.00
Median Family Income (2010)		\$64,,258	Median Housing Value (2010)			\$127,851
Adjusted Median Family Income (2015)		\$74,200	Fair Market Two-Bedroom Rent (2015)			\$719
Families Below Poverty Level (2015)		8.13%	Unemployment Rate (2015)			3.0%

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

Source: U.S. Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Grand Forks AA consists of the entire Grand Forks, ND–MN MMA (Grand Forks MMA). The area includes Grand Forks County in North Dakota and Polk County in Minnesota. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Grand Forks MMA is the 348th largest metropolitan area in the U.S. and the third largest in the state of North Dakota. The current population is estimated at 102 thousand with 4 percent growth since the 2010 Census. The population is projected to increase at a similar pace and reach 107 thousand by 2020.

The banking environment is moderately competitive. There are 21 banks with 46 offices in the Grand Forks AA as of June 30, 2015. USB has a third place deposit rank with \$256 million deposits, a 10 percent deposit market share, three branches, and 13 ATMs. The market is somewhat concentrated with Alerus Financial and Bremer Bank holding a combined 42 percent share of area deposits. Other financial institutions have deposit market shares of 7 percent or less.

The local economy is moderately diverse, but remains at risk due to heavy reliance on a weak agricultural industry. The area underperforms other metropolitan areas in the state due weak crop prices that have declined from historic highs in 2012-2013. The public sector is also an economic driver and provides employment stability. The area's largest employers include the University of North Dakota, the Grand Forks Air Force Base, and Altru Health System. The unemployment rate (3 percent) is among the lowest in the nation, but remains higher than other metropolitan areas in the state and the statewide rate for North Dakota (2.7 percent).

The OCC relied on a recent community contact with an affordable housing representative to better understand area credit needs and opportunities for bank participation. The contact expressed a significant need for affordable housing stock as new construction of apartments and single-family homes has not kept pace with the increasing population. The contact stated the shortage is partly attributable to the limited availability of land for housing development as the productive farm land surrounds the city.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable housing for purchase or rent by LMI persons, financial education, and technical assistance for small business/farm owners.

There are several opportunities to meet credit and community development needs in the Grand Forks AA. The area is served by a variety of local, regional, and statewide community development organizations. Grand Forks is part of a state-designated Renaissance Zone, a program created to help revitalize communities and encourage development through tax incentives. Grand Forks County also has one designated Brownfield site.

Kansas City MMA: Kansas City Assessment Area

2012-2013 Demographic Information for Full Scope Area: Kansas City Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	498	13.25	23.49	32.13	27.91	3.21
Population by Geography	1,864,199	8.45	21.87	36.92	32.75	0.01
Owner-Occupied Housing by Geography	497,288	5.39	18.66	39.29	36.67	0.00
Business by Geography	156,807	6.88	18.98	33.32	39.28	1.55
Farms by Geography	5,145	2.45	16.70	48.07	32.50	0.29
Family Distribution by Income Level	478,414	20.38	17.66	21.47	40.48	0.00
Distribution of LMI Families throughout AA Geographies	181,998	15.45	32.30	36.67	15.58	0.00
Median Family Income (2010)		\$69,313	Median Housing Value (2010)			\$161,765
Adjusted Median Family Income (2013)		\$71,200	MMA Unemployment Rate (2013)			6.3%
2014-2015 Demographic Information for Full Scope Area: Kansas City Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	498	13.05	23.69	31.93	28.11	3.21
Population by Geography	1,864,199	8.26	22.06	36.67	33.00	0.01
Owner-Occupied Housing by Geography	497,288	5.25	18.79	39.02	36.94	0.00
Business by Geography	131,241	6.61	19.22	32.83	39.65	1.69
Farms by Geography	4,438	2.59	17.17	47.07	32.88	0.29
Family Distribution by Income Level	478,414	20.20	17.53	21.42	40.86	0.00
Distribution of LMI Families throughout AA Geographies	180,491	15.25	32.62	36.47	15.66	0.00
Median Family Income (2010)		\$68,846	Median Housing Value (2010)			\$161,765
Adjusted Median Family Income (2015)		\$74,700	Fair Market Two-Bedroom Rent (2015)			\$891
Families Below Poverty Level (2015)		8.00%	MMA Unemployment Rate (2015)			4.8%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Kansas City AA consists of nine (of 14) counties in the Kansas City, MO-KS MMA (Kansas City MMA). The area includes Cass, Clay, Clinton, Jackson, Lafayette, Platte, and Ray Counties in Missouri, and Johnson and Wyandotte Counties in Kansas. Bates and Caldwell Counties in Missouri, and Leavenworth, Linn, and Miami Counties in Kansas, are not included as they are generally located on the outer edges of a very large MMA. The Kansas City AA delineation did not change during the evaluation period, but OMB changes in other portions of the Kansas City MMA produced slight demographic changes. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Kansas City MMA is the 30th largest metropolitan area in the U.S. The current population for the MMA is estimated at 2.09 million with nearly 4 percent growth since the 2010 Census. The MMA population is projected to increase at a slightly slower pace and reach 2.14 million by 2020.

The banking environment is very competitive. There are 123 banks with 649 offices in the Kansas City AA as of June 30, 2015. USB has a fourth place deposit rank with \$3.0 billion deposits, a 6 percent deposit market share, 59 branches, and 75 ATMs. UMB Bank has the largest share of area deposits (20 percent), followed by Commerce Bank (13 percent), and Bank of America (10 percent). All other financial institutions have deposit market shares of 5 percent or less.

The local economy is expanding and diverse. Economic drivers are financial services, technology, and logistics. The area benefits from an educated workforce, above-average per capita income, and below-average costs of doing business. The area is home to two FORTUNE 500 companies (Seaboard Corp. and Lansing Trade Group LLC). Major employers include Cerner Corp, HCA Midwest Health System, Saint Luke's Health System, and Sprint Corp. Employment gains in professional and businesses services, as well as select manufacturing sectors, have increased hourly earnings and personal wages. The unemployment rate (4.8 percent) continues to decline and is at a post-recession low. Unemployment compares favorably to the statewide rate for Missouri (5.0 percent) and the national average (5.3 percent), but continues to underperform the statewide rate for Kansas (4.2 percent).

The OCC contacted a local financial intermediary to better understand area credit needs and opportunities for bank participation. The contact indicated there is a need for affordable home loans and small business financing.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include capacity building for nonprofit organizations, job creation/placement to offset unemployment, strategies to address vacant/abandoned properties, and economic revitalization and/or economic development planning.

There are several opportunities to meet credit and community development needs in the Kansas City AA. The area has a variety of community-based nonprofit organizations and five CDFIs. The Missouri portion of the AA has several state-designated enterprise zones, which provide incentives to support economic development. Additionally, there are many designated Brownfield sites in the MSA.

Lewiston MMA: Lewiston Assessment Area

2012-2015 Demographic Information for Full Scope Area: Lewiston Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	16	0.00	25.00	68.75	6.25	0.00
Population by Geography	60,888	0.00	23.42	67.79	8.78	0.00
Owner-Occupied Housing by Geography	17,327	0.00	19.15	70.05	10.80	0.00
Business by Geography	3,779	0.00	37.95	57.18	4.87	0.00
Farms by Geography	287	0.00	17.42	78.40	4.18	0.00
Family Distribution by Income Level	16,053	19.98	18.23	22.24	39.55	0.00
Distribution of LMI Families throughout AA Geographies	6,134	0.00	31.24	62.47	6.29	0.00
Median Family Income (2010)		\$54,262	Median Housing Value (2010)			\$158,043
Adjusted Median Family Income (2015)		\$60,100	Fair Market Two-Bedroom Rent (2015)			\$695
Families Below Poverty Level (2015)		8.96%	Unemployment Rate (2015)			4.1%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Lewiston AA consists of the entire Lewiston, ID-WA MMA (Lewiston MMA). The area includes Nez Perce County in Idaho and Asotin County in Washington. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Lewiston MMA is the 381st largest metropolitan area in the U.S. The current population is estimated at 62 thousand with 2 percent growth since the 2010 Census. The population is projected to increase at a similar pace and reach 64 thousand by 2020.

The banking environment is moderately competitive. There are 12 banks with 23 offices in the Lewiston AA as of June 30, 2015. USB has a fourth place deposit rank with \$125 million deposits, a 15 percent deposit market share, three branches, and six ATMs. Wells Fargo Bank has the largest share of area deposits (26 percent), followed by Umpqua Bank and Banner Bank (16 percent each). All other financial institutions have deposit market shares of 10 percent or less.

The local economy is slowly recovering, but remains the worst performing metropolitan area in the state. The economy is not particularly diverse and primarily reliant upon manufacturing. Healthcare is increasingly becoming an economic driver due, in part, to a large senior citizen population. The area's aging population and below-average skill level impede business' ability to recruit local talent. Major employers include Clearwater Paper, ATK, Nez Perce Tribe, and St. Joseph Regional Medical Center. Area unemployment (4.1 percent) is comparable to the statewide rate for Idaho (4.2 percent), and lower than the statewide rate for Washington (5.6 percent).

The OCC relied on a recent community contact with an economic development association. The contact expressed a significant need for affordable housing, and commented that local financial institutions are adequately meeting community needs.

There are some opportunities to meet credit and community development needs in the Lewiston AA. The area has a number of community-based nonprofit organizations and several designated Brownfield sites.

Logan MMA: Logan Assessment Area

2012-2015 Demographic Information for Full Scope Area: Logan Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	28	3.57	25.00	50.00	21.43	0.00
Population by Geography	125,442	2.17	26.70	55.37	15.76	0.00
Owner-Occupied Housing by Geography	24,897	0.00	14.51	65.45	20.04	0.00
Business by Geography	8,973	1.11	30.38	49.78	18.72	0.00
Farms by Geography	627	0.00	8.61	79.59	11.80	0.00
Family Distribution by Income Level	28,853	18.78	19.53	22.44	39.25	0.00
Distribution of LMI Families throughout AA Geographies	11,054	3.25	41.15	47.58	8.02	0.00
Median Family Income (2010)		\$54,558	Median Housing Value (2010)			\$174,794
Adjusted Median Family Income (2015)		\$57,200	Fair Market Two-Bedroom Rent (2015)			\$649
Families Below Poverty Level (2015)		10.06%	Unemployment Rate (2015)			3.1%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Logan AA consists of the entire Logan, UT-ID MMA (Logan MMA). The area includes Franklin County in Idaho and Cache County in Utah. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Logan MMA is the 299th largest metropolitan area in the U.S. The current population is estimated at 134 thousand with 7 percent growth since the 2010 Census. The population is projected to increase nearly 8 percent and reach 144 thousand by 2020. Area residents are considerably younger than the national average, with more than half the population under 30 years of age.

Banking competition is moderately competitive. There are ten banks with 28 offices in the Logan AA as of June 30, 2015. USB has an eighth place deposit rank with \$36.5 million deposits, a 2 percent deposit market share, two branches, and two ATMs. Zions First National Bank has the largest share of area deposits (27 percent), followed by Cache Valley Bank (20 percent), Lewiston State Bank (18 percent), and Wells Fargo Bank (17 percent). All other financial institutions have deposit market shares of 5 percent or less.

The local economy is strong and driven by manufacturing, education, and agriculture. Logan has fared better than other manufacturing-dependent metropolitan areas due to strong domestic demand and limited exposure to foreign demand. The cost of doing business in the area is also among the lowest in the nation. The presence of the Utah State University provides economic stability as it is a major employer and contributor to the area's high quality labor force. Other major employers include ICON, Logan Regional Hospital, and EA Miller. Area unemployment (3.1 percent) is well below the national average (5.3 percent) and compares favorably to the statewide rates for Idaho (4.2 percent) and Utah (3.4 percent).

The OCC contacted a local economic development representative to better understand area credit needs and opportunities for bank participation. The contact mentioned several opportunities for bank participation and did not specify any unmet community needs.

There are some opportunities to meet credit and community development needs in the Logan AA. While there is a limited number of community-based nonprofit organizations at the local level, several regional and statewide organizations serve the area. The area also has many designated Brownfield sites.

Louisville MMA: Louisville Assessment Area

2012-2013 Demographic Information for Full Scope Area: Louisville Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	264	12.88	21.59	36.36	28.41	0.76
Population by Geography	1,042,299	9.96	18.39	41.25	30.39	0.00
Owner-Occupied Housing by Geography	279,697	4.96	15.14	44.47	35.43	0.00
Business by Geography	94,194	10.88	16.74	33.44	38.63	0.31
Farms by Geography	2,638	4.02	11.79	39.69	44.35	0.15
Family Distribution by Income Level	265,713	21.69	17.77	20.57	39.97	0.00
Distribution of LMI throughout AA Geographies	104,829	17.23	26.33	40.24	16.19	0.00
Median Family Income (2010)		\$59,921	Median Housing Value (2010)			\$154,149
Adjusted Median Family Income (2013)		\$60,400	Unemployment Rate (2013)			7.3%
2014-2015 Demographic Information for Full Scope Area: Louisville Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	264	13.26	21.21	36.36	28.41	0.76
Population by Geography	1,042,299	10.20	18.15	41.25	30.39	0.00
Owner-Occupied Housing by Geography	279,697	5.17	14.92	44.47	35.43	0.00
Business by Geography	76,865	11.54	16.86	32.84	38.46	0.30
Farms by Geography	2,218	3.83	11.54	39.27	45.27	0.09
Family Distribution by Income Level	265,713	21.79	17.83	20.65	39.73	0.00
Distribution of LMI Families throughout AA Geographies	105,267	17.71	25.80	40.27	16.22	0.00
Median Family Income (2010)		\$60,164	Median Housing Value (2010)			\$154,149
Adjusted Median Family Income (2015)		\$65,400	Fair Market Two-Bedroom Rent (2015)			\$737
Families Below Poverty Level (2015)		10.81%	Unemployment Rate (2015)			4.7%

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

Source: U.S. Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Louisville AA consists of five (of 12) counties in the Louisville/Jefferson County, KY-IN MMA (Louisville MMA). The area includes Bullitt, Clark, Floyd, Jefferson, and Shelby Counties in Kentucky. Henry, Oldham, Spencer, and Trimble Counties in Kentucky, and Harrison, Washington, and Scott Counties in Indiana, are not included as they are generally located on the outer edges of a very large MMA. The Louisville AA delineation did not change during the evaluation period, but OMB changes in other portions of the Louisville MMA produced slight demographic changes. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Louisville MMA is the 43rd largest metropolitan area in the U.S. and the largest in the state of Kentucky. The current population for the MMA is estimated at 1.28 million with 3.5 percent growth since the 2010 Census. The MMA population is projected to increase at a similar pace and reach 1.32 million by 2020.

The banking environment is competitive. There are 32 banks with 365 offices in the Louisville AA as of June 30, 2015. USB has a seventh place deposit rank with \$789 million deposits, a 4 percent deposit market share, 27 branches, and 32 ATMs. PNC Bank has the largest share of area deposits (24 percent), followed by JPMC (18 percent), Fifth Third Bank (11 percent), and Republic Bank & Trust (9 percent). All other financial institutions have less than 8 percent deposit market shares.

The local economy is expanding and moderately diverse. Economic drivers are logistics, defense, and manufacturing. The area is home to one Global 500 and three FORTUNE 500 companies, as well as Fort Knox, a U.S. army post and one of the area's largest employers. The area is also a major research center due to the presence of the University of Louisville. Other major employers include United Parcel Service, Humana Inc., Norton Healthcare, and Ford Motor Co. Job growth exceeds state, regional, and national rates, and area unemployment (4.7 percent) compares favorably to the statewide rates for Kentucky (5.4 percent) and Indiana (4.8 percent).

The OCC relied on input from a recent outreach session to better understand area credit needs and opportunities for bank participation. Numerous community development representatives attended the event. Contacts expressed needs for financial education, funding for nonprofit organizations, small business financing and technical assistance, and revitalization of areas with concentrations of vacant/abandoned properties.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include job creation/placement to offset unemployment, economic revitalization and/or economic development planning, strategies to address vacant/abandoned properties, financial products targeted to underserved/underbanked populations, and technical assistance for small businesses.

There are several opportunities to meet credit and community development needs in the Louisville AA. Numerous community-based nonprofit organizations and three CDFIs serve the area. In addition, there were two federally-designated disasters during the evaluation period, and the area has many designated Brownfield sites. These designations typically allow financial support and/or incentives for specific revitalization efforts.

Minneapolis MMA: Minneapolis Assessment Area

2012-2013 Demographic Information for Full Scope Area: Minneapolis Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	764	8.51	20.68	45.55	24.74	0.52
Population by Geography	3,238,814	6.45	17.79	49.02	26.63	0.12
Owner-Occupied Housing by Geography	906,701	2.59	14.63	53.07	29.70	0.00
Business by Geography	301,002	4.74	16.58	48.00	30.67	0.02
Farms by Geography	8,841	1.11	11.58	63.94	23.37	0.00
Family Distribution by Income Level	808,735	19.48	18.03	23.70	38.79	0.00
Distribution of LMI Families throughout AA Geographies	303,345	10.34	25.26	49.37	15.03	0.00
Median Family Income (2010)		\$80,925	Median Housing Value (2010)			\$254,849
Adjusted Median Family Income (2013)		\$82,300	MMA Unemployment Rate (2013)			4.7%
2014-2015 Demographic Information for Full Scope Area: Minneapolis Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	771	8.17	19.20	45.14	26.98	0.52
Population by Geography	3,264,911	6.26	16.38	48.31	28.93	0.12
Owner-Occupied Housing by Geography	914,859	2.49	13.43	51.77	32.32	0.00
Business by Geography	256,939	4.52	14.94	47.23	33.30	0.02
Farms by Geography	8,000	1.13	10.55	60.80	27.52	0.00
Family Distribution by Income Level	815,617	19.03	17.65	23.34	39.99	0.00
Distribution of LMI Families throughout AA Geographies	299,160	10.20	23.95	49.25	16.60	0.00
Median Family Income (2010)		\$79,301	Median Housing Value (2010)			\$254,057
Adjusted Median Family Income (2015)		\$85,700	Fair Market Two-Bedroom Rent (2015)			\$996
Families Below Poverty Level (2015)		6.28%	MMA Unemployment Rate (2015)			3.4%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Minneapolis AA consists of 13 (of 16) counties in the Minneapolis-St. Paul-Bloomington, MN-WI MMA (Minneapolis MMA). The area includes Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Mille Lacs, Ramsey, Scott, Sherburne, Washington, and Wright Counties in Minnesota, and St. Croix County in Wisconsin. Sibley and Le Sueur Counties in Minnesota, and Pierce County in Wisconsin, are not included in the AA as they are on the outer edges of a very large MMA. The OMB added Mille Lacs, Sibley, and Le Sueur Counties to the Minneapolis MMA as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Minneapolis MMA is the 16th largest metropolitan area in the U.S. The MMA is home to the two largest cities in the state of Minnesota, Minneapolis and St. Paul, otherwise known as the Twin Cities. The current population for the MMA is estimated at 3.52 million with 5 percent growth since the 2010 Census. The MMA population is projected to continue growing at a healthy pace and reach 3.7 million by 2020.

The banking environment is very competitive. There are 143 banks with 784 offices in the Minneapolis AA as of June 30, 2015. USB and Wells Fargo Bank dominate the market with a combined deposit market share of 79 percent. USB has a second place deposit rank with \$59.9 billion deposits, a 35 percent deposit market share, 99 branches, and 441 ATMs. A significant portion of the deposits that USB attributes to this AA (\$26.5 billion or 44 percent) are non-local deposits that have been centralized for administrative purposes. The bank's level of local deposits (\$33.4 billion) is a contextual consideration for this AA. TCF National Bank and BMO Harris Bank have distant third and fourth place deposit rankings, with a combined deposit market share of 5 percent.

The local economy is expanding and highly diversified. It is the second largest economy in the Midwest. The area is a center for high-tech electronics, medical instruments, health care, finance, insurance, entertainment and the arts, printing and publishing, as well as the processing and transportation of agricultural products. The city of St. Paul is the state capital.

The area is home to 18 FORTUNE 500 companies and six Global 500 companies. Target Corporation is the largest employer, with more than 31,000 employees. Other major employers include Allina Health System, University of Minnesota, HealthPartners, Fairview Health System, Wells Fargo, and 3M Corp. Area unemployment (3.4 percent) consistently ranks among the lowest nationally for cities with populations over one million, and compares favorably to the statewide rate for Minnesota (3.7 percent) and the national average (5.3 percent).

The Twin Cities is also a major sports and entertainment center for the upper Midwest. There are several professional sports teams, as well as thriving theatres, orchestras, and art museums. The Mall of America, which is the largest shopping mall in the U.S., is another popular tourist attraction with nearly 40 million visitors annually. While the Twin Cities have a strong tourism draw on their own, the area is also a starting point for much of Minnesota's fishing, hunting, and lake recreation areas.

The OCC conducted three community contacts with economic development and affordable housing representatives to better understand area credit needs and opportunities for bank involvement. Contacts expressed needs for affordable housing (particularly in suburban areas), financing and technical assistance for small businesses, and transit-oriented development. Two contacts specifically mentioned USB as an active participant, both as an investor and through board member participation.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include job creation/placement to offset unemployment, affordable housing for purchase or rent by LMI persons, programs for homeless persons, financing and technical assistance for small businesses/farms, and economic revitalization.

There are significant opportunities to meet credit and community development needs in the Minneapolis AA. The area has numerous community-based nonprofit organizations and 17 CDFIs. The nonprofit sector is well organized, informed, and aware of CRA requirements. Both Minneapolis and St. Paul have HUD-approved Consolidated Plans to address community needs. In addition, there are two Consolidated Plans for the area, led by Dakota and Hennepin Counties in participation with a consortium of other counties and cities. Portions of the city of Minneapolis are within a HUD-designated Empowerment Zone. Portions of Minneapolis, St. Paul, and surrounding suburbs are in a SBA HUBZone. There also are hundreds of designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development efforts.

Omaha MMA: Omaha Assessment Area

2012-2015 Demographic Information for Full Scope Area: Omaha Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	240	12.08	21.25	39.58	26.67	0.42
Population by Geography	814,583	8.93	20.59	40.24	29.92	0.32
Owner-Occupied Housing by Geography	208,500	5.51	17.02	43.99	33.47	0.00
Business by Geography	53,847	6.80	17.12	44.09	31.54	0.45
Farms by Geography	2,964	1.65	6.51	62.99	28.81	0.03
Family Distribution by Income Level	202,824	20.54	17.35	22.61	39.50	0.00
Distribution of LMI Families throughout AA Geographies	76,850	15.86	29.47	40.23	14.44	0.00
Median Family Income (2010)		\$69,538	Median Housing Value (2010)			\$148,002
Adjusted Median Family Income (2015)		\$72,800	Fair Market Two-Bedroom Rent (2015)			\$807
Families Below Poverty Level (2015)		7.85%	MMA Unemployment Rate (2015)			3.2%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Omaha AA consists of five (of eight) counties in the Omaha-Council Bluffs, NE-IA MMA (Omaha MMA). The area includes Cass, Douglas, Sarpy, and Washington Counties in Nebraska, and Pottawattamie County in Iowa. Harrison and Mills Counties in Iowa, and Saunders County in Nebraska, are excluded from the AA as the MMA is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Omaha MMA is the 59th largest metropolitan area in the U.S. and the largest in the state of Nebraska. The area benefits from strong population growth. The current population for the MMA is estimated at 915 thousand with nearly 6 percent growth since the 2010 Census. The MMA population is projected to increase at a similar pace and reach 959 thousand by 2020.

The banking environment is competitive. There are 54 banks with 287 offices in the Omaha AA as of June 30, 2015. USB has a fourth place deposit rank with \$2.6 billion deposits and a 9 percent deposit market share. USB has the largest retail footprint in the market with 34 branches and 52 ATMs, followed closely by First National Bank of Omaha (FNBO) with 32 branches. FNBO has the largest share of area deposits (27 percent), followed by Wells Fargo Bank and Mutual of Omaha Bank (15 percent each). All other financial institutions have deposit market shares less than 6 percent.

The local economy is growing and diverse. Economic drivers are financial services and logistics. Omaha benefits from low business costs, a skilled workforce, and above-average per capita income. The area is home to one Global 500 company and five FORTUNE 500 companies, including Berkshire Hathaway, ConAgra Foods, Union Pacific, Peter Kiewit Sons', and Mutual of Omaha. There are also two large universities in the area, the University of Nebraska Omaha and Creighton University. Major employers include Offutt Air Force Base, CHI Health, Nebraska Medical Center, and The Methodist Health System. The healthcare, finance, and insurance industries are adding jobs at an above-average pace, although manufacturing weaknesses are driving unemployment higher. Area unemployment (3.2 percent) still outperforms regional and national averages.

The OCC relied on a recent community contact with a local economic development representative to better understand area credit needs and opportunities for bank involvement. The contact spoke of unmet credit needs in pockets of northern Omaha due to tightening lending restrictions. The contact stated the biggest community need is access to capital for small business owners who may have poor credit histories.

U.S. Bank conducted an external survey in 2015 to assess community needs. Needs identified through the survey include financial products targeted to underserved/underbanked populations, financial education for individuals, job creation/placement to offset unemployment, and affordable rental housing for LMI persons.

There are several opportunities to meet credit and community development needs in the Omaha AA. The area has numerous community-based nonprofit organizations and two CDFIs. Portions of Omaha are included in a state-designated Enterprise Zone, and there are many designated Brownfield sites in the Omaha and Council Bluffs areas. These designations typically allow financial support and/or incentives for specific economic development and or revitalization efforts.

Portland MMA: Portland Assessment Area

2012-2015 Demographic Information for Full Scope Area: Portland Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	486	2.88	23.87	47.12	25.72	0.41
Population by Geography	2,214,943	2.70	23.71	48.08	25.50	0.01
Owner-Occupied Housing by Geography	535,935	1.26	18.34	50.29	30.11	0.00
Business by Geography	209,619	4.30	22.64	43.83	29.11	0.12
Farms by Geography	6,266	1.76	14.65	54.13	29.41	0.05
Family Distribution by Income Level	537,668	20.51	17.75	21.41	40.33	0.00
Distribution of LMI Families throughout AA Geographies	205,712	4.39	33.28	47.11	15.22	0.00
Median Family Income (2010)		\$68,924	Median Housing Value (2010)			\$303,264
Adjusted Median Family Income (2015)		\$73,900	Fair Market Two-Bedroom Rent (2015)			\$944
Families Below Poverty Level (2015)		8.28%	MMA Unemployment Rate (2015)			5.2%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Portland AA consists of six (of seven) counties in the Portland-Vancouver-Hillsboro OR-WA MMA (Portland MMA). The area includes Clackamas, Columbia, Multnomah, Washington, and Yamhill Counties in Oregon, and Clark County in Washington. Skamania County, Washington is excluded as the area is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Portland MMA is the 23rd largest metropolitan area in the U.S. and the largest in the state of Oregon. The MMA has experienced above-average population growth due to favorable migration patterns. The current population for the MMA is estimated at 2.39 million with 7 percent growth since the 2010 Census. The MMA population is projected to grow at a slightly slower pace and reach 2.54 million by 2020.

The banking environment is competitive. There are 36 financial institutions with 555 offices in the Portland AA as of June 30, 2015. USB has a first place deposit rank with \$9.8 billion deposits, a 23 percent deposit market share, 106 branches, and 222 ATMs. Banks with the next largest share of area deposits are Bank of America (20 percent) and Wells Fargo Bank (19 percent). All other financial institutions have deposit market shares of 10 percent or less.

The local economy is expanding and highly diversified. Economic drivers are technology, logistics, and manufacturing. The area is home to two FORTUNE 500 companies and one Global 500 company (Nike). Major employers include Intel Corp, Providence Health Systems, Oregon Health & Science University, and Kaiser Permanente. The local job market is strong and income growth is accelerating, driven by high-tech services. The area benefits from a highly skilled workforce, and the unemployment rate (5.2 percent) has fallen below the 2008 pre-recession level (6.1 percent). Current unemployment compares favorably to the statewide rate for Oregon (5.6 percent) and is similar to the national average (5.3 percent), but is still somewhat higher compared to other large metropolitan areas.

High housing demand has increased home values. Vacancy rates for Portland housing (both homeowner and rental) are well below rates for the state of Oregon and the nation overall. The median home sales price (\$312 thousand in 2015) increased 9.1 percent in the prior year, and is not affordable for people making the median income.

The OCC relied on two community contacts with affordable housing and economic development organizations to better understand area credit needs and opportunities. One contact expressed needs for gap financing, small dollar business loans, and credit building loan programs for persons with lower credit scores. The other contact expressed a need for more affordable housing options due to the growing population and housing demand.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include affordable rental housing for LMI persons, job creation/ placement to offset unemployment, capacity building for nonprofit organizations, programs for homeless persons, financial education, and economic revitalization and/or economic development planning.

There are significant opportunities to meet credit and community development needs in the Portland AA. The area has a wide variety of community development organizations and 14 CDFIs, including loan funds, banks, and credit unions. There are a number of state-designated Enterprise Zones, at least ten designated Urban Renewal Areas, as well as an abundance of designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development efforts.

St. Louis MMA: St. Louis Assessment Area

2012-2013 Demographic Information for Full Scope Area: St. Louis Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	608	12.50	20.39	39.64	27.14	0.33
Population by Geography	2,767,054	7.82	18.96	42.69	30.50	0.04
Owner-Occupied Housing by Geography	781,368	4.49	17.23	45.11	33.17	0.00
Business by Geography	215,934	5.63	16.60	39.32	38.37	0.09
Farms by Geography	7,650	1.45	12.73	54.58	31.20	0.04
Family Distribution by Income Level	716,406	21.17	17.20	21.17	40.46	0.00
Distribution of LMI Families throughout AA Geographies	274,899	13.99	27.93	41.87	16.20	0.00
Median Family Income (2010)		\$67,013	Median Housing Value (2010)			\$170,485
Adjusted Median Family Income (2013)		\$69,200	MMA Unemployment Rate (2013)			7.1%
2014-2015 Demographic Information for Full Scope Area: St. Louis Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	603	12.44	19.24	40.46	27.53	0.33
Population by Geography	2,741,859	7.71	17.89	43.39	30.97	0.04
Owner-Occupied Housing by Geography	774,067	4.36	16.09	45.84	33.70	0.00
Business by Geography	171,997	5.50	15.74	39.97	38.69	0.10
Farms by Geography	6,416	1.31	11.63	55.14	31.87	0.05
Family Distribution by Income Level	709,930	20.94	17.07	21.16	40.83	0.00
Distribution of LMI Families throughout AA Geographies	269,843	13.94	26.59	42.91	16.55	0.00
Median Family Income (2010)		\$66,798	Median Housing Value (2010)			\$171,294
Adjusted Median Family Income (2015)		\$72,200	Fair Market Two-Bedroom Rent (2015)			\$816
Families Below Poverty Level (2015)		8.62%	MMA Unemployment Rate (2015)			5.1%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The St. Louis AA consists of 12 (of 15) counties in the St. Louis, MO-IL MMA (St. Louis MMA). The area includes Franklin, Jefferson, Lincoln, St. Charles, St. Louis, and Warren Counties, as well as St. Louis City, all in Missouri. The area also includes Clinton, Macoupin, Madison, Monroe, and St. Clair Counties in Illinois. Bond, Calhoun, and Jersey Counties in Illinois are not included as they are on the outer edges of a very large MMA. The OMB removed Washington County, Missouri from the St. Louis MMA as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The St. Louis MMA is the 20th largest metropolitan area in the U.S. and the largest in the state of Missouri. The current population for the MMA is estimated at 2.81 million with less than 1 percent growth since the 2010 Census. The area suffers from persistent out-migration, which is partly due to a lack of job opportunities, especially among younger residents. The MMA population is projected to increase at a similar pace and reach 2.84 million by 2020.

The banking environment is very competitive. There are 130 banks with 896 offices in the St. Louis AA as of June 30, 2015. Scottrade Bank has the first place deposit rank with \$14.4 billion deposits and a 16 percent deposit market share. USB has a very close second place deposit rank with \$13.9 billion deposits and a 15.6 percent deposit market share. Despite a second place deposit rank, USB has the largest service network with 117 branches and 309 ATMs (compared to the one branch, internet-based Scottrade Bank). Financial institutions with the next largest share of area deposits are Bank of America (12 percent) and Commerce Bank (7 percent). All other financial institutions have deposit market shares of 5 percent or less.

The local economy is diverse. Financial services, logistics, and tourism are economic drivers. St. Louis benefits from a central location within the U.S. and its position at the confluence of the Mississippi and Missouri Rivers, making it an important logistics and transportation hub. The Port of St. Louis on the Mississippi River is the 17th largest U.S. port and supports thousands of jobs. The area is also home to nine FORTUNE 500 companies and three Global 500 companies. Major employers include BJC Healthcare, Boeing Defense, Washington University, Scott Air Force Base, and SSM Health Care Systems. Area unemployment (5.1 percent) has improved since 2012 (7.3 percent) and is comparable to or better than the statewide rates for Missouri (5.0 percent) and Illinois (5.9 percent).

The economy continues to recover. Wage gains are sluggish and single family housing starts are near historic lows. Homeowner vacancies and rental inventories are also above statewide and national averages as the housing market has recovered more slowly than elsewhere in the Midwest. Per the St. Louis Consolidated Plan, the weak housing market has depressed housing values and property taxes, which constricts the city's tax base and in turn, makes less funding available for infrastructure maintenance/improvement and community development initiatives.

The OCC conducted four community contacts to better understand area credit needs and opportunities. Contacts included representatives from organizations supporting affordable housing, neighborhood revitalization, and other community services. The contacts identified opportunities for financial institution participation in the areas of tax credits, tax exempt bond financing, financial education, homebuyer education, long-term financing for nonprofit housing developers, and general operating support and technical assistance for small nonprofit organizations. Other credit needs include mortgage products for LMI persons, home improvement loans, and working capital loans for small businesses. Several contacts mentioned it continues to be difficult for LMI persons to obtain home loans. All contacts considered the level of local bank involvement to be satisfactory.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include job creation/placement to offset unemployment, affordable housing for purchase or rent by LMI persons, economic revitalization and/or economic development planning, strategies to address vacant/abandoned properties, and financial products targeted to underserved/underbanked populations.

There are significant opportunities to meet credit and community development needs in the St. Louis AA. The area has numerous community-based nonprofit organizations and 11 CDFIs, including eight credit unions and three loan funds. A large portion of St. Louis-East St. Louis is part of an Urban Empowerment Zone (a designation given to highly-distressed urban communities), and there is an abundance of designated Brownfield sites in the area. These designations typically allow financial support and/or incentives for specific economic development efforts.

Arizona: Phoenix Assessment Area

2012-2015 Demographic Information for Full Scope Area: Phoenix Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	991	9.18	24.52	33.91	31.38	1.01
Population by Geography	4,192,887	8.18	24.70	36.00	30.95	0.17
Owner-Occupied Housing by Geography	1,008,811	3.66	21.50	38.06	36.77	0.01
Business by Geography	343,574	6.43	15.83	30.97	46.20	0.58
Farms by Geography	6,845	5.64	17.18	34.43	42.35	0.39
Family Distribution by Income Level	1,000,063	21.18	17.76	20.47	40.59	0.00
Distribution of LMI Families throughout AA Geographies	389,428	13.42	36.31	33.84	16.44	0.00
Median Family Income (2010)		\$64,408	Median Housing Value (2010)			\$251,130
Adjusted Median Family Income (2015)		\$64,000	Fair Market Two-Bedroom Rent (2015)			\$908
Families Below Poverty Level (2015)		11.72%	Unemployment Rate (2015)			5.3%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Phoenix AA consists of the entire Phoenix-Mesa-Scottsdale, AZ MSA (Phoenix MSA), including Maricopa and Pinal Counties. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Phoenix MSA is the 12th largest metropolitan area in the U.S and the largest in the state of Arizona. The area has experienced strong population growth in recent years. The current population is estimated at 4.6 million with 9 percent growth since the 2010 Census. The population is projected to increase rapidly from in-migration and reach 5.1 million by 2020.

The banking environment is very competitive. There are 58 banks with 889 offices in the Phoenix AA as of June 30, 2015. USB has an eighth place deposit rank with \$1.4 billion deposits, a 2 percent deposit market share, 66 branches, and 82 ATMs. JPMC, Wells Fargo, and Bank of America dominate the market with a combined deposit market share of 72 percent. All other financial institutions have deposit market shares less than 4 percent.

The local economy continues to recover and is diverse. Financial services and retirees are economic drivers. The area benefits from low business costs, which is attractive to businesses relocating from Southern California. Tourism also contributes to the economy and is expected to increase. Almost one in six jobs since 2010 are in the leisure and hospitality industry, although the resulting high concentration of such jobs weighs on income growth. Phoenix is home to four FORTUNE 500 companies and one Global 500 company. Major employers include Banner Health System, Wal-Mart Stores, Fry's Food Stores, Wells Fargo, and Arizona State University. Area unemployment (5.3 percent) has improved since 2012 (7.4 percent) and is better than the statewide rate for Arizona (6.1 percent).

The Phoenix housing market is improving, and housing remains extremely affordable. While foreclosure inventory remains above state and national averages, it has been clearing out recently.

The OCC conducted a community contact with an affordable housing organization to better understand area credit needs and opportunities. The contact expressed needs for first-time homebuyer loans, financial products/services targeted to LMI persons, and micro-lending products. The contact commented on a perceived decrease in investments, grants, and donations from large financial institutions, and also stated that nonprofit organizations need bank employee participation on their boards of directors.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include capacity building for nonprofit organizations, job creation/placement to offset unemployment, affordable housing for purchase or rent by LMI persons, and financial products targeted to underserved/underbanked populations.

There are several opportunities to meet credit and community development needs in the Phoenix AA. The city of Phoenix, Maricopa County, and the city of Casa Grande have formal Consolidated Plans to address community needs. Many nonprofit organizations and nine CDFIs (seven loan funds and two credit unions) serve the area. There also are several designated Brownfield sites.

Arkansas: Little Rock Assessment Area

2012-2015 Demographic Information for Full Scope Area: Little Rock Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	148	7.43	23.65	45.27	22.97	0.68
Population by Geography	631,401	5.52	20.79	45.41	28.27	0.00
Owner-Occupied Housing by Geography	159,852	3.06	17.40	49.03	30.51	0.00
Business by Geography	46,934	4.79	24.65	38.94	31.61	0.02
Farms by Geography	1,354	2.95	14.25	50.22	32.57	0.00
Family Distribution by Income Level	161,796	21.42	17.98	20.27	40.34	0.00
Distribution of LMI throughout AA Geographies	63,737	9.07	30.27	45.45	15.21	0.00
Median Family Income (2010)		\$58,911	Median Housing Value (2010)			\$137,547
Adjusted Median Family Income (2015)		\$63,400	Fair Market Two-Bedroom Rent (2015)			\$744
Families below Poverty Level (2015)		10.84%	MSA Unemployment Rate (2015)			4.5%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Little Rock AA consists of five (of six) counties in the Little Rock-North Little Rock-Conway, AR MSA (Little Rock MSA). The area includes Faulkner, Grant, Perry, Pulaski, and Saline Counties. Lonoke County is not included as it is located on the far eastern edge of the MSA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Little Rock MSA is the 76th largest metropolitan area in the U.S and the largest in the state of Arkansas. The current population for the MMA is estimated at 732 thousand with 4.6 percent growth since the 2010 Census. The MMA population is projected to increase at a similar pace and reach 759 thousand by 2020.

The banking environment is competitive. There are 31 banks with 283 offices in the Little Rock AA as of June 30, 2015. USB has a ninth place deposit rank with \$560 million deposits, a 4 percent deposit market share, 21 branches, and 22 ATMs. Bank of America has the largest share of area deposits (23 percent), followed by Bank of the Ozarks (12 percent), and Regions Bank (11 percent). All other financial institutions have deposit market shares of 10 percent or less.

The local economy continues to recover and is diverse. State government, the military, and medical centers are economic drivers. The area is home to two FORTUNE 500 companies (Dillard's and Windstream Holdings). Major employers include the University of Arkansas for Medical Sciences, Baptist Health Care, Little Rock Air Force Base, and Acxiom Corporation. The area is experiencing strong job growth, particularly in the higher wage professional services and state government sectors. Companies, call centers, customer service operations, and outsourced human resource services are relocating to the area due to a skilled workforce and relatively lower cost of doing business. Job growth has also been boosted by increased government employment (due to healthy state finances) and a large expansion project at the Little Rock Air Force Base. Area unemployment (4.5 percent) compares favorably to the statewide rate for Arkansas (5.1 percent) and the national average (5.3 percent).

The OCC relied on a community contact with a local economic development representative to better understand area credit needs and opportunities. The contact stated there is a need for housing stock, and starter-homes for middle-income borrowers in particular. The contact also mentioned USB's first-time homebuyer product (American Dream) and noted there has not been great demand for the program. The contact considered the level of local bank involvement to be satisfactory.

USB conducted an external survey in 2015 to assess community needs. Per survey results, community development needs include financial education, and economic revitalization (including financing) and/or economic development planning.

There are several opportunities to meet credit and community development needs in the Little Rock AA. The area has numerous community-based nonprofit organizations. An Empowerment Zone exists for parts of Pulaski County. In addition, some portions of the MSA had designated disasters in 2013 and 2014, and there are many designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development efforts.

California: Los Angeles Assessment Area

2012-2015 Demographic Information for Full Scope Area: Los Angeles Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	2,346	8.99	28.64	26.77	34.02	1.58
Population by Geography	9,818,605	8.01	29.43	28.26	33.92	0.39
Owner-Occupied Housing by Geography	1,552,091	2.13	16.61	28.64	52.61	0.01
Business by Geography	734,030	6.42	18.23	25.19	48.90	1.26
Farms by Geography	7,024	3.29	16.29	26.79	52.98	0.65
Family Distribution by Income Level	2,170,227	24.05	16.43	17.64	41.88	0.00
Distribution of LMI Families throughout AA Geographies	878,478	13.64	41.84	26.84	17.67	0.01
Median Family Income (2010)		\$61,622	Median Housing Value (2010)			\$526,439
Adjusted Median Family Income (2015)		\$63,000	Fair Market Two-Bedroom Rent (2015)			\$1,424
Families Below Poverty Level (2015)		12.61%	Unemployment Rate (2015)			6.6%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Los Angeles AA consists of the entire Los Angeles-Long Beach-Glendale, MD (Los Angeles MD), which is comprised of Los Angeles County in Southern California. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Los Angeles MD is part of the Los Angeles-Long Beach- Anaheim MSA, the second most populated metropolitan area in the U.S. Los Angeles County is also the most populated county in the nation. The current population for the MD is estimated at 10.2 million with 3.5 percent growth since the 2010 Census. The MD population is projected to increase at a similar pace and reach 10.5 million by 2020.

The banking environment is very competitive. There are 110 banks with 1,794 offices in the Los Angeles AA as of June 30, 2015. USB has a tenth place deposit rank with \$7.8 billion deposits, a 2 percent deposit market share, 142 branches, and 153 ATMs. Bank of America has the largest share of area deposits (20 percent), followed by Wells Fargo Bank (15 percent), MUFG Union Bank (11 percent), and JPMC (11 percent). All other financial institutions have deposit market shares less than 10 percent.

The local economy is expanding and diverse. International trade, entertainment, aerospace, technology, fashion apparel, and tourism all contribute to the economy, but growth has been particularly dynamic in the technology and entertainment industries. Major employers include the University of California Los Angeles, Kaiser Permanente, University of Southern California, and Northrup Crumman Corp. The area is home to one Global 500 and 13 FORTUNE 500 companies, including Walt Disney Co., Amgen Inc., Aecom, Health Net Inc., and Molina Healthcare Inc.

Los Angeles is a major center for the American entertainment industry. The famed Hollywood neighborhood leads the world in the creation of television productions and recorded music; it is also a leader in motion picture production and a popular tourist destination. Los Angeles is a major transportation hub and home to the two busiest ports in the country (by container volume). On a combined basis, the Ports of Los Angeles and Long Beach rank as the tenth busiest container port complex in the world. The seaports, also known as the Los Angeles/Long Beach Harbor, employ over 800 thousand people in Southern California.

Population growth continues to drive up home values and reduce the affordability of single family and rental housing. The median housing value in Los Angeles County (\$497 thousand) increased 18 percent increase since 2013, and is significantly higher than the nationwide median (\$194 thousand). The high cost of housing makes home ownership largely unattainable for low- and moderate-income persons in this market. The costs of living and doing business in the area are also higher than national averages and hinder longer-term demographic growth. College attainment is low relative to the technology centers in California and the nation overall, and is an impediment to employment opportunities. Area unemployment (6.6 percent) declined since 2012 (10.9 percent), but remains above the statewide rate for California (6.2 percent) and the national average (5.3 percent). The percentage of families living below poverty level (12.6 percent) is also higher than the national average (10.6 percent).

The OCC contacted a local community development corporation to better understand area credit needs and opportunities. The contact expressed needs for long term financing, healthcare, and employment opportunities in LMI communities. The contact also stated there are ample opportunities for financial institutions to participate in home loan financing, real estate development, small business lending in LMI areas, flexible loan products, and CDFI investments.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include capacity building for nonprofit organizations, job creation/placement to offset high unemployment, affordable rental housing for LMI persons, financial education, technical assistance for small businesses, and economic revitalization.

There are significant opportunities to meet credit and community development needs in the Los Angeles AA. Los Angeles County has a 2013-2017 Consolidated Plan to address community needs, including affordable housing stock, programs to help homeless and special need populations, economic development, and infrastructure improvements. The Consolidated Plan for the city of Los Angeles also focuses on job creation, education and job readiness, and the stabilization/revitalization of diverse neighborhoods. The area is served by numerous community-based nonprofit organizations and CDFIs (including ten CDFIs in Los Angeles proper). Los Angeles is an Urban Renewal Community and an Empowerment Zone, and there are Enterprise Zones located primarily on the eastern edges of the city. These designations provide business incentives and benefits for area development, including tax benefits, state loans, and venture capital funding. The area also has more than 200 designated Brownfield sites.

California: Sacramento Assessment Area

2012-2015 Demographic Information for Full Scope Area: Sacramento Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	484	7.64	23.55	38.22	30.37	0.21
Population by Geography	2,149,127	7.15	23.70	37.93	30.90	0.31
Owner-Occupied Housing by Geography	486,536	3.73	17.99	41.15	37.13	0.00
Business by Geography	155,857	6.92	20.99	38.74	33.34	0.01
Farms by Geography	4,026	3.70	16.24	46.55	33.51	0.00
Family Distribution by Income Level	517,461	22.01	17.00	19.98	41.01	0.00
Distribution of LMI Families throughout AA Geographies	201,867	11.49	34.48	36.74	17.29	0.00
Median Family Income (2010)		\$71,816	Median Housing Value (2010)			\$361,742
Adjusted Median Family Income (2015)		\$71,500	Fair Market Two-Bedroom Rent (2015)			\$1,012
Families Below Poverty Level (2015)		8.53%	Unemployment Rate (2015)			5.9%

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

Source: US Census, FFIEC Bureau of Labor Statistics, and National Association of Realtors

The Sacramento AA consists of the entire Sacramento-Arden-Arcade-Roseville, CA MSA (Sacramento MSA). The area includes El Dorado, Placer, Sacramento, and Yolo counties. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Sacramento MSA is the 27th largest in the U.S. and the fifth largest in the state of California. The MSA has experienced steady population growth due to improving economic conditions and relatively lower costs of living and doing business compared to surrounding metropolitan areas. The current population for the MSA is estimated at 2.27 million with nearly 6 percent growth since the 2010 Census. The MSA population is projected to increase at a similar pace and reach 2.41 million by 2020.

The banking environment is competitive. There are 40 institutions with 412 offices in the Sacramento AA as of June 30, 2015. USB has a second place deposit rank with \$7.7 billion deposits, a 17 percent deposit market share, 52 branches, and 59 ATMs. Wells Fargo Bank has the largest share of area deposits (23 percent). Bank of America ranks third with a 16 percent deposit market share. All other financial institutions have deposit market shares less than 8 percent.

The local economy continues to recover and is driven by the public sector and technology. Sacramento is the state capital and home to the University of California Davis (area's largest employer) and the California State University Sacramento (a top ten employer). State government employs more than 115,000 people in total. Tech investment from the nearby San Francisco Bay Area has also contributed to economic growth. Major employers include Sutter Health Sacramento Sierra Region, UC Davis Health System, Kaiser Permanente, and Intel Corporation. The area is experiencing a strong labor market, and hourly earnings are growing at an above-average rate. Area unemployment (5.9 percent) is much improved since 2012 (10.3 percent) and slightly better than the statewide rate for California (6.2 percent), but still underperforms the national average (5.3 percent). The combination of more jobs and higher pay is driving up home values.

The OCC conducted two community contacts with affordable housing and economic development representatives to better understand area credit needs and opportunities. Contacts expressed a need for affordable housing stock. The residential housing market is stressed due to the migration of residents from surrounding areas seeking lower cost homes and rents. One contact stated that LMI communities are having more trouble gaining access to capital - and consequently, are not experiencing the same level of accelerated economic activity.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable housing for purchase or rent by LMI persons, job creation/placement to offset high unemployment, capacity building for nonprofit organizations, financial education, and programs for homeless persons.

There are several opportunities to meet credit and community development needs in the Sacramento AA. The area has numerous nonprofit organizations and four CDFIs. Additionally, the city and county of Sacramento are part of an Enterprise Zone, and the area has numerous Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and or revitalization efforts.

Colorado: Denver Assessment Area

2012-2015: Demographic Information for Full Scope Area: Denver Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	605	11.40	22.64	32.56	32.23	1.16
Population by Geography	2,489,661	11.39	23.34	32.64	32.59	0.05
Owner-Occupied Housing by Geography	631,576	6.50	19.37	35.18	38.95	0.00
Business by Geography	281,937	8.44	20.23	30.31	40.70	0.32
Farms by Geography	5,155	7.24	18.39	32.78	41.51	0.08
Family Distribution by Income Level	605,228	22.09	17.11	20.18	40.62	0.00
Distribution of LMI Families throughout AA Geographies	237,240	19.73	34.43	29.58	16.25	0.00
Median Family Income (2010)		\$75,101	Median Housing Value (2010)		\$265,725	
Adjusted Median Family Income (2015)		\$79,900	Fair Market Two-Bedroom Rent (2015)		\$1,156	
Families Below Poverty Level (2015)		8.73%	MSA Unemployment Rate (2015)		3.7%	

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Denver AA consists of six (of ten) counties in the Denver-Aurora-Lakewood, CO MSA (Denver MSA). The area includes Adams, Arapahoe, Broomfield, Denver, Douglas, and Jefferson Counties. Clear Creek, Elbert, Gilpin, and Park Counties are not included due to the large size of the MSA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Denver MSA is the 19th largest metropolitan area in the U.S. and the largest in the state of Colorado. The MSA has experienced strong population growth in recent years. The current population for the MSA is 2.8 million with nearly 11 percent growth since the 2010 Census. The MSA population is projected to increase at a slightly slower pace and reach 3.0 million by 2020.

The banking environment is very competitive. There are 70 banks with 661 offices in the Denver AA as of June 30, 2015. USB has a third place deposit rank with \$8.8 billion deposits, a 13 percent deposit market share, 82 branches, and 138 ATMs. Wells Fargo Bank has the largest share of area deposits (27 percent), followed by FirstBank (14 percent). JPMC ranks fourth with a 10 percent deposit market share. All other financial institutions have deposit market shares of 4 percent or less.

The local economy is strong and diverse. Technology, financial services, and logistics are economic drivers. The area has a concentration of high-tech firms, a well-educated workforce, and the perception of an above-average quality of life, which attracts a large number of engineering, computer systems, and scientific research companies. The area is home to one Global 500 and ten FORTUNE 500 companies. Major employers include HealthONE, CenturyLink, Exempla Healthcare, University of Colorado Hospital, and the Children's Hospital. Job growth has exceeded state and national averages. The unemployment rate (3.7 percent) is at its lowest level since 2000, and ranks among the lowest in the nation.

Housing availability and affordability are significant community needs. Home values have increased faster than other comparable metropolitan areas due to an undersupply of single family homes and demand that is outpacing new home construction. The median housing value increased 22 percent between 2013 and 2015, and is now \$314 thousand. The relatively high cost of housing makes home ownership difficult for low-income persons in this market.

The OCC conducted one community contact with affordable housing nonprofit corporation, and relied on another contact with an economic development representative, to better understand area credit needs and opportunities. Contacts expressed needs for the development of single family homes and apartments, financial education, small business financing, and residential loans for LMI persons. Increased home values are making it difficult for LMI persons to afford housing. One contact also mentioned language barriers as an impediment to banking for some minorities.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include affordable housing for purchase or rent by LMI persons, programs for homeless persons, financial products targeted to underserved/underbanked populations, technical assistance for small businesses, and economic revitalization.

There are significant opportunities to meet credit and community development needs in the Denver AA. A number of local Consolidated Plans exist to address community needs. Many community-based nonprofit organizations and ten CDFIs serve the area. In addition, the area has five Enterprise Zones and an abundance of designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development efforts.

Florida: West Palm Beach Assessment Area

2012-2015 Demographic Information for Full Scope Area: West Palm Beach Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	203,968	3.57	18.88	31.75	45.56	0.24
Farms by Geography	4,409	4.15	21.50	30.05	44.23	0.07
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of LMI Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
Median Family Income (2010)		\$64,445	Median Housing Value (2010)			\$288,519
Adjusted Median Family Income (2015)		\$64,900	Fair Market Two-Bedroom Rent (2015)			\$1,206
Families Below Poverty Level (2015)		8.58%	Unemployment Rate (2015)			5.0%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The West Palm Beach AA consists of the entire West Palm Beach-Boca Raton-Delray Beach, FL MD (West Palm Beach MD), which is comprised of Palm Beach County. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The West Palm Beach MD is part of the larger Miami, FL MSA, the eighth largest metropolitan area in the U.S. The current population for the MD is estimated at 1.43 million with 8 percent growth since the 2010 Census. The MD population is projected to increase and reach 1.64 million by 2020, primarily due to the in-migration of retirees. The area boasts the largest share of residents aged 65+ years among metropolitan areas with more than one million residents.

The banking environment is competitive. There are 58 banks with 480 offices in the West Palm Beach AA as of June 30, 2015. USB has a 52nd place deposit rank with \$13.8 million deposits, less than 1 percent deposit market share, and one branch. Wells Fargo Bank has the largest share of area deposits (21 percent), followed by Bank of America (17 percent), and JPMC (9 percent). All other financial institutions have deposit market shares less than 7 percent.

The local economy remains in recovery and is fairly diverse, although heavily reliant on retirees and tourism. Palm Beach County is home to three FORTUNE 500 companies (NextEra Energy, Office Depot and Jarden), and major employers include Publix Super Markets, Tenet Healthcare Corp., Comcast, NextEra Energy, and Signature Healthcare. The economy has slowed recently due to the loss of jobs in the leisure, hospitality, construction, and professional and technical services sectors. Annual job growth is below the statewide average, although area unemployment (5.1 percent) remains lower than the statewide rate for Florida (5.4 percent) and the national average (5.3 percent). Retiree spending offsets the slowing job market and provides some insulation against economic downturns.

Despite the slowing job market and high cost of living, home values continue to appreciate due to the in-migration of retirees. The relatively high cost of housing makes home ownership difficult for low-income persons in this market.

The OCC relied on a community contact with an affordable housing organization to better understand area credit needs and opportunities. The contact stated the area is struggling to keep up with the demand for affordable housing and expressed needs for more affordable housing stock and financing options for LMI homebuyers. The contact also mentioned there are opportunities for local financial institutions to collaborate with investors and nonprofit organizations to address these needs.

There are several opportunities to meet credit and community development needs in the West Palm Beach AA. The area has numerous community-based nonprofit organizations and three CDFIs. Palm Beach County is a designated Enterprise Zone and was a designated disaster area in 2012, due to Hurricane Isaac. The area also has several Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development plans.

Idaho: Boise Assessment Area

2012-2015: Demographic Information for Full Scope Area: Boise Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	94	2.13	32.98	40.43	24.47	0.00
Population by Geography	609,533	1.20	28.50	42.80	27.51	0.00
Owner-Occupied Housing by Geography	153,565	0.58	24.66	44.24	30.52	0.00
Business by Geography	42,862	0.97	31.10	38.15	29.79	0.00
Farms by Geography	2,150	0.70	27.49	50.00	21.81	0.00
Family Distribution by Income Level	151,610	19.52	18.37	22.47	39.65	0.00
Distribution of LMI Families throughout AA Geographies	57,440	2.31	41.92	40.45	15.32	0.00
Median Family Income (2010)		\$59,649	Median Housing Value (2010)			\$199,830
Adjusted Median Family Income (2015)		\$61,300	Fair Market Two-Bedroom Rent (2015)			\$736
Families Below Poverty Level (2015)		9.01%	MSA Unemployment Rate (2015)			4.0%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Boise AA consists of four (of five) counties in the Boise City, ID MSA (Boise MSA) including Ada, Canyon, Gem, and Owyhee Counties. Boise County is not included as it mostly consists of the Boise National Forest. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Boise MSA is the 81st largest metropolitan area in the country. Boise City is the most populated city in the state of Idaho and serves as the state capital. The population for the MSA is estimated at 677 thousand with 10 percent growth since the 2010 Census. Above-average population growth is attributable to favorable migration patterns. The MSA population is projected to have solid growth and reach 735 thousand by 2020.

The banking environment is moderately competitive. There are 20 banks with 180 offices in the Boise AA as of June 30, 2015. USB has a second place deposit rank with \$2.1 billion deposits, a 23 percent deposit market share, 39 branches, and 59 ATMs. Wells Fargo Bank has the largest share of area deposits (26 percent), although it has fewer branches (24) than USB. KeyBank ranks third with an 11 percent deposit market share. All other financial institutions have deposit market shares of 6 percent or less.

The local economy is expanding and diverse. Manufacturing and high tech are economic drivers. The area is experiencing robust job growth, decreasing unemployment, and healthy home value appreciation. The area also benefits from an educated work force and lower costs of living and doing business compared to other metropolitan areas in the West. Major employers include St. Luke's Health System, Wal-Mart Stores Inc., Mountain Home Air Force Base, Micron Technology Inc. (a FORTUNE 500 company), and St. Alphonsus Regional Medical Center. Area unemployment (4.0 percent) is comparable to the statewide rate for Idaho (4.1 percent) and well below the national average (5.3 percent).

The OCC relied on a community contact with an economic development corporation to better understand area credit needs and opportunities. The contact expressed needs for small businesses and entrepreneurs, including working capital loans, financial educational, and technical assistance. The contact specifically mentioned USB as an active participant in community development projects.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include financial education for consumers, financing for small businesses/farms, job creation/placement, and economic revitalization and/or economic development planning.

There are several opportunities to meet credit and community development needs in the Boise AA. The area has numerous community-based nonprofit organizations and two CDFI loan funds. There is also an abundance of designated Brownfield sites.

Illinois: Springfield, IL Assessment Area

2012-2015: Demographic Information for Full Scope Area: Springfield, IL Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	53	16.98	20.75	35.85	24.53	1.89
Population by Geography	197,465	11.39	18.64	37.54	31.92	0.52
Owner-Occupied Housing by Geography	57,820	6.44	17.47	40.46	35.63	0.00
Business by Geography	12,668	11.19	21.15	31.97	31.62	4.07
Farms by Geography	721	2.91	8.32	52.70	35.92	0.14
Family Distribution by Income Level	51,150	22.31	15.92	21.83	39.94	0.00
Distribution of LMI Families throughout AA Geographies	19,556	19.36	27.10	36.12	17.39	0.03
Median Family Income (2010)		\$66,823	Median Housing Value (2010)			\$116,203
Adjusted Median Family Income (2015)		\$74,500	Fair Market Two-Bedroom Rent (2015)			\$730
Families Below Poverty Level (2015)		9.95%	MSA Unemployment Rate (2015)			5.2%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Springfield, IL AA consists of Sangamon County in the Springfield, IL MSA (Springfield, IL MSA). Menard County is excluded from the AA as the entire MSA is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Springfield, IL MSA is the 210th largest metropolitan area in the U.S., and Springfield is the state capital. The current population for the MSA is estimated at 211 thousand with less than 1 percent growth since the 2010 Census. Population growth is relatively flat due to out-migration. The MSA population is projected to reach 214 thousand by 2020.

The banking environment is moderately competitive. There are 25 banks with 85 offices in the Springfield, IL AA as of June 30, 2015. USB has a sixth place deposit rank with \$418 million deposits, an 8 percent deposit market share, four branches, and nine ATMs. JPMC, Illinois National Bank, and the Bank of Springfield each hold 11 percent deposit market shares, followed closely by United Community Bank (10 percent) and Marine Bank (9 percent). All other financial institutions have deposit market shares of 8 percent or less.

The local economy is moderately diverse and driven by medical centers and state government. The area benefits from a highly skilled labor force, as well as low costs of living and doing business. Major employers include Memorial Health System, St. John's Hospital, Springfield Clinic LLP, the University of Illinois, and the SIU School of Medicine. Employment is growing in the education and healthcare sectors, and area unemployment (5.2 percent) has improved since 2012 (7.2 percent). However, the state's dire fiscal situation poses significant risk to the local economy. Budgetary issues resulting from a public pension shortfall will likely lead to tax increases, stagnant government payrolls, and increased potential for government shutdown.

The OCC relied on a recent community contact with a local community improvement organization to better understand area credit needs and opportunities. The contact expressed needs for entry-level housing stock, student housing, and community revitalization. The contact also commented that several nonprofit organizations have been active in acquiring distressed properties with the intent of improving the community.

There are several opportunities to meet credit and community development needs in the Springfield, IL AA. The city of Springfield also has a formalized Consolidated Plan to address community needs, including affordable housing, community services, economic development, and neighborhood revitalization. A number of local affordable housing and community service nonprofit organizations serve the area. Springfield is also a state-designated enterprise zone, which typically allows financial support and/or incentives for specific economic development efforts.

Indiana: Eastern Indiana Assessment Area

2012-2015: Demographic Information for Full Scope Area: Eastern Indiana Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	0.00	25.00	68.75	6.25	0.00
Population by Geography	119,365	0.00	28.41	64.33	7.26	0.00
Owner-Occupied Housing by Geography	34,465	0.00	22.28	69.64	8.08	0.00
Business by Geography	6,301	0.00	30.57	59.10	10.33	0.00
Farms by Geography	779	0.00	4.49	87.03	8.47	0.00
Family Distribution by Income Level	32,873	21.71	20.34	22.92	35.03	0.00
Distribution of LMI Families throughout AA Geographies	13,823	0.00	37.83	58.05	4.12	0.00
Median Family Income (2010)		\$53,037	Median Housing Value (2010)			\$92,990
Adjusted Median Family Income (2015)		\$56,700	Fair Market Two-Bedroom Rents (2015)			\$643-\$691
Families Below Poverty Level (2015)		11.94%	County Unemployment Rates (2015)			5.0-6.5%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Eastern Indiana AA consists of three non-MSA counties (Fayette, Randolph, and Wayne) located in east central Indiana. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Eastern Indiana AA population is declining due to out-migration. The current population is estimated at 115 thousand with a 3 percent decline since the 2010 Census. In addition to population decline, the area suffers from persistent poverty. The percentage of families living below the poverty level is nearly 12 percent, compared to a national average of 10.6 percent. Eleven (of 17) census tracts in Wayne County are designated as distressed due to poverty.

The banking environment is moderately competitive. There are 15 banks with 51 offices in the Eastern Indiana AA as of June 30, 2015. USB has a third place deposit rank with \$280 million deposits, a 12 percent deposit market share, 12 branches, and 12 ATMs. Merchants Bank of Indiana has the largest share of area deposits (25 percent), followed by First Bank Richmond (17 percent). All other financial institutions have deposit market shares of 8 percent or less.

The local economy is stagnant. The area has not experienced significant growth since the recession ended, although it also did not experience the full brunt of the downturn. Manufacturing, health care services, and agriculture within Randolph County specifically, are the predominant industries. Major employers include Fayette Regional Health, Reid At Home Care, Premium Transportation Staffing, Ardagh Group, St. Vincent Randolph Hospital, Stant Corp, and Catrons Glass Inc. Unemployment levels vary throughout the area, with rates for Randolph County (5.0 percent) and Wayne County (5.3 percent) slightly higher than the statewide rate for Indiana (4.8 percent) and in line with the national average (5.3 percent). Unemployment in Fayette County is much higher (6.5 percent).

The OCC relied on a community contact with an economic development representative to better understand area credit needs and opportunities. Economic development is a significant need for the area, along with community infrastructure improvements that are necessary to attract and retain business. Banks are needed to purchase Bond Anticipation Notes in order to finance such infrastructure projects. The contact believes community banks have met area credit needs better than large banks.

Opportunities to meet community development needs are somewhat limited in the Eastern Indiana AA. The area has a limited number of community-based nonprofit organizations and only one CDFI. Designations that typically allow financial support and/or incentives for specific economic development and revitalization efforts are limited to a state-designated Enterprise Zone for the city of Connersville in Fayette County, census tracts in Wayne County that are designated as distressed based on poverty, and some designated Brownfield sites.

Iowa: Cedar Rapids Assessment Area

2012-2015: Demographic Information for Full Scope Area: Cedar Rapids Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	52	1.92	23.08	53.85	21.15	0.00
Population by Geography	237,302	1.22	17.63	51.25	29.90	0.00
Owner-Occupied Housing by Geography	70,521	0.28	16.64	51.49	31.58	0.00
Business by Geography	16,585	5.26	19.84	45.40	29.50	0.00
Farms by Geography	1,444	0.07	6.58	62.88	30.47	0.00
Family Distribution by Income Level	61,516	17.40	19.10	23.65	39.85	0.00
Distribution of LMI Families throughout AA Geographies	22,451	0.99	26.55	54.90	17.57	0.00
Median Family Income (2010)		\$67,971	Median Housing Value (2010)			\$136,370
Adjusted Median Family Income (2015)		\$78,100	Fair Market Two-Bedroom Rent (2015)			\$745
Families Below Poverty Level (2015)		5.59%	MSA Unemployment Rate (2015)			3.9%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Cedar Rapids AA consists Benton and Linn Counties in the Cedar Rapids, IA MSA (Cedar Rapids MSA). Jones County is not included due to the large size of the MSA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Cedar Rapids MSA is the 179th largest metropolitan area in the U.S and the second largest in the state of Iowa. The current population for the MSA is estimated at 266 thousand with 3 percent growth since the 2010 Census. However, migration patterns are worsening and expected to impact future population growth. The MSA population is projected to increase less than 1 percent and reach 270 thousand by 2020.

The banking environment is moderately competitive. There are 37 institutions with 91 offices in the Cedar Rapids AA as of June 30, 2015. USB has a first place deposit rank with \$887 million deposits, an 18 percent deposit market share, ten branches, and 16 ATMs. Wells Fargo Bank has the next largest share of area deposits (12 percent) followed closely by Farmers State Bank (11 percent), Cedar Rapids Bank (10 percent), and Trust Company (10 percent). All other financial institutions have deposit market shares of 7 percent or less.

The local economy is expanding, but not particularly diverse. High tech manufacturing and logistics are economic drivers - specifically, aerospace manufacturing with an emphasis on military aircraft. Rockwell Collins Inc. is the largest employer (and only FORTUNE 500 company) in the area. It provides avionics and computer aircraft equipment and is a primary contractor for the U.S. military. Other major employers include TransAmerica, St. Luke's Hospital, Mercy Medical Center, and Kirkwood Community College. The area benefits from a well-educated workforce and stable housing market. The level of unemployment (3.9 percent) is comparable to the statewide rate for Iowa (3.8 percent) and is much lower than the national average (5.3 percent).

The OCC conducted two community contacts with local economic and community development representatives to better understand area credit needs and opportunities. The contacts commented that the Cedar Rapids economy continues to improve since the flood of 2008. Housing is in better shape than before the flood, and new business startups have increased significantly due to the influx of disaster funding. The contacts also indicated that banks are actively serving the community and credit needs are being met.

There are several opportunities to meet credit and community development needs in the Cedar Rapids AA. Cedar Rapids has a consolidated community improvement plan. The plan focuses on affordable housing, transitional housing, as well as social services for homeless and LMI persons. There are numerous community-based nonprofit organizations in the area. In addition, portions of the city of Cedar Rapids are in an Enterprise Zone, and there are several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development efforts.

Kansas: Lawrence Assessment Area

2012-2015: Demographic Information for Full Scope Area: Lawrence Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	22	9.09	22.73	45.45	22.73	0.00
Population by Geography	110,826	8.96	20.19	48.38	22.46	0.00
Owner-Occupied Housing by Geography	22,987	2.25	16.14	50.96	30.65	0.00
Business by Geography	6,747	7.04	23.40	43.19	26.37	0.00
Farms by Geography	317	1.89	9.78	45.11	43.22	0.00
Family Distribution by Income Level	23,335	21.60	16.23	21.87	40.30	0.00
Distribution of LMI Families throughout AA Geographies	8,827	9.02	24.24	48.58	18.16	0.00
Median Family Income (2010)		\$68,282	Median Housing Value (2010)			\$183,385
Adjusted Median Family Income (2015)		\$74,100	Fair Market Two-Bedroom Rent (2015)			\$815
Families Below Poverty Level (2015)		8.09%	Unemployment Rate (2015)			3.7%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Lawrence AA consists of the entire Lawrence, KS MSA (Lawrence MSA), which is comprised of Douglas County. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Lawrence MSA is the 326th largest metropolitan area in the U.S. The current population is estimated at 118 thousand with 6.5 percent growth since the 2010 Census. The population is projected to continue growing and reach 127 thousand by 2020.

The banking environment is moderately competitive. There are 23 banks with 53 offices in the Lawrence AA as of June 30, 2015. USB has a first place deposit rank with \$456 million deposits, a 22 percent deposit market share, five branches, and 12 ATMs. Banks with the next largest share of area deposits are Capitol Federal Savings Bank (20 percent), Central Bank of the Midwest (12 percent), and Commerce Bank (10 percent). All other financial institutions have deposit market shares less than 5 percent.

The local economy continues to recover, but is not particularly diverse. Higher education and high tech are the economic drivers. The University of Kansas is the area's largest employer and serves as an economic anchor, providing a stable source of medium-wage jobs and stimulating growth in consumer industries. Other major employers include the Lawrence Memorial Hospital, General Dynamics, and Berry Plastics. Lawrence has an abundance of skilled labor and a relatively young population. The area also benefits from low costs of living and doing business. Area unemployment is low (3.7 percent) and compares favorably to the statewide rate for Kansas (4.2 percent) and the national average (5.3 percent).

The OCC conducted a community contact with a local community service organization to better understand area credit needs and opportunities. The contact stated there is a need for affordable housing given the large number of college students competing for low-cost housing. The contact also expressed needs for startup business financing, committee volunteerism, and grant dollars.

There are several opportunities to meet credit and community development needs in the Lawrence AA. The city of Lawrence has a Consolidated Plan to address community needs, including affordable housing and neighborhood revitalization. While affordable housing development is challenged by the high cost of land, the area benefits from numerous community-based nonprofit organizations.

Kentucky: Bowling Green Assessment Area

2012-2013 Demographic Information for Full Scope Area: Bowling Green Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	16.67	4.17	45.83	33.33	0.00
Population by Geography	113,792	13.02	3.86	47.97	35.15	0.00
Owner-Occupied Housing by Geography	26,033	3.93	3.32	48.42	44.33	0.00
Business by Geography	9,834	13.34	2.04	49.12	35.50	0.00
Farms by Geography	561	3.57	1.43	51.87	43.14	0.00
Family Distribution by Income Level	26,879	21.50	16.44	18.94	43.11	0.00
Distribution of LMI Families throughout AA Geographies	10,200	16.25	7.28	53.95	22.51	0.00
Median Family Income (2010)		\$54,856	Median Housing Value (2010)			\$134,540
Adjusted Median Family Income (2013)		\$58,300	MSA Unemployment Rate (2013)			7.3%
2014-2015 Demographic Information for Full Scope Area: Bowling Green Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	30	13.33	6.67	50.00	30.00	0.00
Population by Geography	133,748	11.08	6.65	50.42	31.85	0.00
Owner-Occupied Housing by Geography	31,876	3.21	6.23	51.72	38.84	0.00
Business by Geography	9,352	11.31	4.30	50.01	34.38	0.00
Farms by Geography	628	1.59	5.57	59.55	33.28	0.00
Family Distribution by Income Level	32,405	21.08	15.98	19.60	43.33	0.00
Distribution of LMI Families throughout AA Geographies	12,010	13.38	10.50	57.05	19.07	0.00
Median Family Income (2010)		\$51,720	Median Housing Value (2010)			\$127,235
Adjusted Median Family Income (2015)		\$57,600	Fair Market Two-Bedroom Rent (2015)			\$659
Families Below Poverty Level (2015)		12.43%	MSA Unemployment Rate (2015)			4.9%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Bowling Green AA consists of Allen and Warren Counties in the Bowling Green, KY MSA (Bowling Green MSA). Edmonson and Butler Counties are not included in the AA due to the large size of the MSA. The OMB added Allen County to the MSA as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Bowling Green MSA is the 246st largest metropolitan area in the U.S. The current population for the MSA is estimated at 168 thousand with 6 percent growth since the 2010 Census. The population is projected to continue growing and reach 176 thousand by 2020.

The banking environment is moderately competitive. There are 20 banks with 60 offices in the Bowling Green AA as of June 30, 2015. USB has a first place deposit rank with \$383 million deposits, a 17 percent deposit market share, nine branches, and 24 ATMs. Banks with the next largest share of area deposits are Branch Banking and Trust Company (16 percent) and American Bank & Trust Company Inc. (10 percent). All other financial institutions have deposit market shares of 9 percent or less.

The local economy is relatively diverse and growing steadily. Economic drivers include manufacturing (specifically, automotive-related manufacturing) and the Western Kentucky University. The area benefits from a high concentration of corporate headquarters and low costs of doing business, but it also has low per capita income and a low concentration of high-wage jobs. Major employers include Houchens Industries Inc., Commonwealth Health Corp., Western Kentucky University, and Fruit of the Loom. Area unemployment (4.9 percent) compares favorably to the statewide rate for Kentucky (5.4 percent) and the national average (5.3 percent).

The OCC conducted a community contact with a local community action agency to better understand area credit needs and opportunities. The contact did not mention any unmet needs and welcomed additional bank partnerships to expand its programs.

There are several opportunities to meet credit and community development needs in the Bowling Green AA. The area has a number of community-based nonprofit organizations, and Bowling Green is a Rural Round II Enterprise community. The city of Bowling Green receives Community Development Block Grant (CDBG) funding, and it has a five-year Consolidated Plan (2014-2019) to address the priority needs of the CDBG Program, including quality affordable housing and neighborhood revitalization.

Minnesota: Duluth Assessment Area

2012-2015: Demographic Information for Full Scope Area: Duluth Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	74	10.81	18.92	50.00	18.92	1.35
Population by Geography	235,612	6.98	12.69	58.07	22.26	0.00
Owner-Occupied Housing by Geography	73,851	3.03	10.59	65.42	20.95	0.00
Business by Geography	17,031	13.11	10.52	57.34	19.04	0.00
Farms by Geography	569	3.51	7.03	68.72	20.74	0.00
Family Distribution by Income Level	61,055	19.85	17.90	22.96	39.29	0.00
Distribution of LMI Families throughout AA Geographies	23,049	9.43	18.32	60.35	11.91	0.00
Median Family Income (2010)		\$59,812	Median Housing Value (2010)			\$149,105
Adjusted Median Family Income (2015)		\$63,500	Fair Market Two-Bedroom Rent (2015)			\$755
Families Below Poverty Level (2015)		8.53%	MSA Unemployment Rate (2015)			5.0%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Duluth AA consists of two (of three) counties in the Duluth MN-WI MSA (Duluth MSA). The area includes Carlton and St Louis Counties in Minnesota. Douglas County is not included as the bank has no branches in the Wisconsin portion of the Duluth MSA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Duluth MSA is the 168th largest metropolitan area in the U.S and the second largest in the state of Minnesota. The current population for the MSA is estimated at 280 thousand with essentially no growth since the 2010 Census. The MSA population is projected to decline to 274 thousand by 2020 due to out-migration.

The banking environment is moderately competitive. There are 25 banks with 83 offices in the Duluth AA as of June 30, 2015. USB has a second place deposit rank with \$606 million deposits, a 17 percent deposit market share, ten branches, and 37 ATMs. Wells Fargo Bank has the largest share of area deposits (31 percent). All other financial institutions have deposit market shares less than 8 percent.

The local economy remains in recession and is not particularly diverse. Energy and resources are primary drivers, which makes the economy highly dependent on the commodity cycle. Declines in mining (particularly iron ore) have negatively impacted area employment due to low commodity prices and excess global supply. The area does, however, benefit from lower costs of living and doing business. Other major industries include logistics (area is home to the Port of Duluth-Superior) and health services. Major employers include Essentia Health, University of Minnesota Duluth, St Luke's Hospital, Allete Inc., and Minnesota Taconite. The area has below-average housing vacancies due to a lack of homebuilding in recent years. Residential construction is expected to pick up and lead to more construction jobs. Area unemployment (5.0 percent) is considerably higher than the statewide rate for Minnesota (3.7 percent), but still lower than the national average (5.3 percent).

The OCC conducted two community contacts to better understand area credit needs and opportunities. The contacts included a local small business development organization and a group of individuals representing various community organizations in Duluth. Contacts expressed needs for affordable housing and working capital loans for entrepreneurs and startup businesses. One contact stated affordable workforce housing development is the greatest area need – specifically, gap financing to fund the difference between development costs and the sales price on new construction projects. Another contact spoke of the lack of suitable locations for startup businesses, and commented that it is cost prohibitive to restore available retail space to be compliant with city code due its distressed condition.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable rental housing for LMI persons, financing and technical assistance for small businesses/farms, economic revitalization and/or economic development planning, and programs for homeless persons.

There are several opportunities to meet credit and community development needs in the Duluth AA. Both St. Louis County and the city of Duluth have HUD-approved Consolidated Plans to address community needs. Many community-based nonprofit organizations and five CDFIs serve the area. There was a major federal disaster declaration in 2012 for one of the area's worst floods on record. Duluth also has several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development, and revitalization and stabilization efforts.

Missouri: Springfield, MO Assessment Area

2012-2015: Demographic Information for Full Scope Area: Springfield, MO Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	91	3.30	24.18	54.95	17.58	0.00
Population by Geography	436,712	2.31	18.23	59.65	19.82	0.00
Owner-Occupied Housing by Geography	114,920	0.49	15.96	61.19	22.36	0.00
Business by Geography	28,797	0.80	23.97	55.32	19.91	0.00
Farms by Geography	1,693	0.18	10.34	76.61	12.88	0.00
Family Distribution by Income Level	113,220	19.49	18.42	22.14	39.96	0.00
Distribution of LMI Families throughout AA Geographies	42,918	1.97	26.33	60.72	10.97	0.00
Median Family Income (2010)		\$52,463	Median Housing Value (2010)			\$126,386
Adjusted Median Family Income (2015)		\$55,900	Fair Market Two-Bedroom Rent (2015)			\$654
Families Below Poverty Level (2015)		11.05%	Unemployment Rate (2015)			4.4%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Springfield, MO AA consists of the entire Springfield, MO MSA (Springfield, MO MSA). The area includes Christian, Dallas, Greene, Polk and Webster counties in southwestern Missouri. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Springfield, MO MSA is the 112th largest metropolitan area in the U.S. and the third largest in the state of Missouri. The current population is estimated at 452 thousand with 4.5 percent growth since the 2010 census. The population is projected to grow at a rate that outpaces the national average and reach 482 thousand by 2020.

The banking environment is moderately competitive. There are 39 institutions with 191 offices in the Springfield, MO AA as of June 30, 2015. USB has a seventh place deposit rank with \$341.2 million deposits, a 4 percent deposit market share, 13 branches, and 14 ATMs. Commerce Bank and Great Southern Bank have the largest share of area deposits (15 percent each), followed by Central Bank of the Ozarks (11 percent). All other financial institutions have deposit market shares of 6 percent or less.

The local economy continues to recover and is diverse. Economic drivers are education, healthcare, and logistics. The city of Springfield serves as a regional healthcare hub as it is the only large municipality within a 70 mile radius. Springfield is also home to several universities, including the Missouri State University. While the area, consequently, has an above-average population of young adults, it struggles to retain graduates due to limited attractive job opportunities. Springfield is home to one FORTUNE 500 company (O'Reilly Automotive). Major employers include Mercy Health Springfield Community, Cox Health Systems, Wal-Mart Stores Inc., Bass Pro Shop, and the Missouri State University. Unemployment (4.4 percent) compares favorably to the statewide rate for Missouri (5.0 percent) and the national average (5.3 percent).

A tighter labor market has contributed to above-average wage growth in Springfield, although this income growth has not yet translated into a robust housing market recovery. Housing appreciation is below the national average, and single family housing starts are at low levels.

The OCC contacted a local economic development representative to better understand area credit needs and opportunities. The contact commented that while the local economy was not robust, the lending market remained competitive. The contact did not mention any unmet community needs, and was of the opinion that banks are adequately meeting small business credit needs.

While there are several opportunities to meet community development needs in the Springfield, MO AA, the smaller number and scale of affordable housing and economic development projects is an impediment to USB's community development lending efforts. The city of Springfield has a formal Consolidated Plan to address community needs, including affordable housing stock, job creation, and community services for homeless and LMI persons. The area has some community-based nonprofit organizations and five credit union CDFIs. The city of Springfield administers four enhanced enterprise zones that, combined, encompass nearly the entire city and surrounding unincorporated portions of Greene County. There were three major federal disaster declarations affecting the MSA during the evaluation period, and the area also has several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and or revitalization efforts.

Montana: Billings Assessment Area

2012-2015: Demographic Information for Full Scope Area: Billings Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	32	3.13	12.50	65.63	18.75	0.00
Population by Geography	147,972	2.53	12.40	64.84	20.22	0.00
Owner-Occupied Housing by Geography	41,996	1.12	9.62	67.75	21.51	0.00
Business by Geography	12,997	3.22	10.32	70.89	15.58	0.00
Farms by Geography	629	1.27	6.68	72.66	19.40	0.00
Family Distribution by Income Level	38,047	19.08	18.23	22.93	39.76	0.00
Distribution of LMI Families throughout AA Geographies	14,194	3.26	20.10	65.99	10.65	0.00
Median Family Income (2010)		\$61,572	Median Housing Value (2010)			\$167,587
Adjusted Median Family Income (2015)		\$66,800	Fair Market Two-Bedroom Rent (2015)			\$728
Families Below Poverty Level (2015)		7.91%	MSA Unemployment Rate (2015)			3.3%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Billings AA consists of Yellowstone County in the Billings, MT MSA (Billings MSA). The AA excludes Carbon and Golden Valley counties as the entire MSA is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Billings MSA is the 247th largest metropolitan area in the U.S. Billings is also the largest city in Montana. The current population for the MSA is estimated at 168 thousand with 6 percent growth since the 2010 Census. The MSA population is projected to increase and reach 177 thousand by 2020, although future growth may be adversely affected by stagnant oil production and corresponding layoffs.

The banking environment is moderately competitive. There are 12 banks with 44 offices in the Billings AA as of June 30, 2015. USB has a second place deposit rank with \$1 billion deposits, a 23 percent deposit market share, four branches, and 18 ATMs. First Interstate Bank has the largest share of area deposits (24 percent). Wells Fargo Bank and Glacier Bank have third and fourth place deposit rankings, each with a 15 percent deposit market share. All other financial institutions have deposit market shares of 12 percent or less.

The local economy is growing and diverse. Tourism, medical centers, and energy/resources are economic drivers. Due to favorable infrastructure, Billings serves as a support services hub for commodities extraction in the region. Billings' proximity to Yellowstone National Park and numerous mountain ranges also makes it a popular tourist destination. Major employers include Stillwater Mining Co., Deaconess Billings Clinic, St. Vincent Healthcare, Wal-Mart Stores Inc., and Avitus Group. Although low oil prices have generated layoffs by the area's largest employer, the level of unemployment (3.3 percent) still compares favorably to the statewide rate for Montana (4.1 percent) and the national average (5.3 percent).

The Billings housing market has seen stable growth despite low oil prices and related impacts to the local economy. Housing values in both the Billings MSA and the state of Montana exceed the national average.

The OCC contacted a local community development corporation to better understand area credit needs and opportunities. The contact expressed needs for financial education and literacy programs, investment in Native American CDFIs, revolving loan funds to support economic development, and financing/funding for nonprofit organizations.

While there are some opportunities to meet credit and community development needs in the Billings AA, opportunities for community development lending are limited due to the city's focus on infrastructure improvements in recent years. The area still has several community-based nonprofit organizations, one CDFI, and several designated Brownfield sites for other community development activities.

Nebraska: Lincoln Assessment Area

2012-2015: Demographic Information for Full Scope Area: Lincoln Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	74	13.51	20.27	31.08	31.08	4.05
Population by Geography	285,407	11.91	18.93	36.83	31.79	0.53
Owner-Occupied Housing by Geography	69,500	4.96	14.03	40.58	40.43	0.00
Business by Geography	19,895	7.67	22.77	32.27	36.82	0.46
Farms by Geography	1,078	1.67	7.98	20.22	70.13	0.00
Family Distribution by Income Level	69,373	19.40	18.18	23.30	39.12	0.00
Distribution of LMI Families throughout AA Geographies	26,069	15.97	25.94	38.00	20.09	0.00
Median Family Income (2010)		\$66,851	Median Housing Value (2010)			\$146,648
Adjusted Median Family Income (2015)		\$71,000	Fair Market Two-Bedroom Rent (2015)			\$700
Families Below Poverty Level (2015)		7.72%	MSA Unemployment Rate (2015)			2.7%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Lincoln AA consists of one (of two) counties in the Lincoln, NE MSA (Lincoln MSA). The AA includes Lancaster County. Seward County is excluded as the entire area is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Lincoln MSA is the 154th largest metropolitan area in the U.S. Lincoln is also the second largest city in the state of Nebraska. The current population for the MSA is estimated at 324 thousand with 7 percent growth since the 2010 Census. The MSA population is projected to continue growing at a similar pace and reach 342 thousand by 2020.

The banking environment is moderately competitive. There are 24 banks with 129 offices in the Lincoln AA as of June 30, 2015. USB has a third place deposit rank with \$867 million deposits, a 13 percent deposit market share, 13 branches, and 15 ATMs. Union Bank and Trust Company has the largest share of area deposits (27 percent), followed by Wells Fargo Bank (19 percent). All other financial institutions have deposit market shares of 8 percent or less.

The local economy is strong and relatively diverse. Financial services and state government are the economic drivers. While the area's dependence on government employment presents concentration risk, the state of Nebraska has strong finances. The area also benefits from a well-educated workforce and good transportation infrastructure. Major employers include the University of Nebraska-Lincoln, BryanLGH Medical Center, Saint Elizabeth Health Systems, Hy-Vee Inc., and B & R Stores. The unemployment rate (2.7 percent) is among the lowest in the nation, and the tight job market has produced above-average wage gains.

The OCC contacted an affordable housing organization and relied on another recent contact with a local CDFI to better understand area credit needs and opportunities. Contacts expressed needs for community development equity funding, community development loan pools, and better credit options for underserved populations.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable homes for purchase and rent by LMI persons, economic revitalization and/or economic development planning, and programs for homeless persons.

There are several opportunities to meet credit and community development needs in the Lincoln AA. The city of Lincoln has a HUD-approved Consolidated Plan to address area needs, including programs for homeless persons, neighborhood revitalization, and affordable housing. Numerous community-based nonprofit organizations and one CDFI serve the area. Lincoln and Lancaster Counties had a major disaster declaration in 2015 due to severe storms, tornadoes, and flooding. The area also has many designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Nevada: Las Vegas Assessment Area

2012-2015: Demographic Information for Full Scope Area: Las Vegas Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	487	5.75	23.20	41.27	29.77	0.00
Population by Geography	1,951,269	5.29	22.78	42.19	29.74	0.00
Owner-Occupied Housing by Geography	405,047	1.74	15.53	45.66	37.07	0.00
Business by Geography	98,521	4.92	21.14	42.34	31.59	0.00
Farms by Geography	1,587	2.33	18.27	43.86	35.54	0.00
Family Distribution by Income Level	457,592	20.10	18.02	22.00	39.88	0.00
Distribution of LMI Families throughout AA Geographies	174,412	9.69	33.02	40.10	17.20	0.00
Median Family Income (2010)		\$63,888	Median Housing Value (2010)			\$253,307
Adjusted Median Family Income (2015)		\$59,200	Fair Market Two-Bedroom Rent (2015)			\$969
Families Below Poverty Level (2015)		8.70%	Unemployment Rate (2015)			6.8%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Las Vegas AA consists of the entire Las Vegas-Henderson-Paradise, NV MSA (Las Vegas MSA), which is comprised of Clark County. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Las Vegas MSA is the 29th largest metropolitan area in the U.S. and the largest in the state of Nevada. The area benefits from strong population growth as it attracts retirees and workers for service industry and construction employment. The current population for the MSA is estimated at 2.1 million with more than 8 percent growth since the 2010 Census. The MSA population is projected to increase at more rapidly and reach 2.4 million by 2020.

The banking environment is competitive. There are 38 banks with 350 offices in the Las Vegas AA as of June 30, 2015. USB has a fifth place deposit rank with \$2.8 million deposits, a 6 percent deposit market share, 68 branches, and 73 ATMs. Wells Fargo Bank and Bank of America dominate the market with a combined deposit market share of 52 percent. All other financial institutions have deposit market shares less than 11 percent.

The local economy continues to recover, but is not particularly diverse. Tourism and retirees are primary economic drivers. Las Vegas is known as the entertainment capital of the world, drawing millions of visitors each year. The area is home to four FORTUNE 500 companies, all of which are resorts and casinos. Major employers include Station Casinos Inc., Nellis Air Force Base, Boyd Gaming Corp., Las Vegas Sands Corp., and Wynn Las Vegas LLC. Per capita income is well below the national average due to a high share of low-skill/wage jobs and relatively low educational attainment. The area also suffers from high employment volatility and overreliance on consumer spending to spur growth. Area unemployment (6.8 percent) has improved significantly since 2012 (11.3 percent) and mirrors the statewide rate for Nevada, but still remains high compared to the national average (5.3 percent).

The housing market has improved over the evaluation period. The median sales price for existing single family homes steadily increased from a post-recession low of \$118 thousand in early 2012 to \$217 thousand in 2015. Home foreclosures, however, continue to be a concern. The MSA foreclosure rate (0.14 percent) is higher than the state of Nevada rate (0.12 percent) and double the national rate. In addition, a large portion of area homes are purchased by cash investors, which makes it difficult for first-time homebuyers to compete. This competition and a relatively high cost of housing makes home ownership difficult for low-income persons in this market.

The OCC contacted a community service organization and relied upon another recent contact with a small business development organization to better understand area credit needs and opportunities. Contacts expressed needs for first-time homebuyer education/support, job training, small dollar consumer loans, and financing for small business startups (including those with poor credit histories).

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include job creation/placement to offset high unemployment, affordable rental housing for LMI persons, economic revitalization and/or economic development planning, capacity building for nonprofit organizations, and programs for homeless persons.

There are several opportunities to meet credit and community development needs in the Las Vegas AA. Clark County and the city of Las Vegas both have HUD-approved Consolidated Plans to address area needs, including affordable housing, community facilities and infrastructure, as well as services for homeless, LMI, and special need persons. A variety of community-based nonprofit organizations and one CDFI serve the area. There also is an abundance of designated Brownfield sites.

New Mexico: Albuquerque Assessment Area

2012-2015 Demographic Information for Full Scope Area: Albuquerque Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	203	4.93	28.57	35.47	30.54	0.49
Population by Geography	887,077	4.46	31.72	33.64	30.17	0.00
Owner-Occupied Housing by Geography	229,939	2.24	27.69	35.35	34.73	0.00
Business by Geography	58,785	6.06	26.47	34.34	33.14	0.00
Farms by Geography	1,226	3.43	25.77	36.95	33.85	0.00
Family Distribution by Income Level	215,464	22.17	17.86	19.18	40.80	0.00
Distribution of LMI Families throughout AA Geographies	86,245	6.39	44.69	32.43	16.49	0.00
Median Family Income (2010)		\$59,381	Median Housing Value (2010)			\$193,241
Adjusted Median Family Income (2015)		\$59,400	Fair Market Two-Bedroom Rent (2015)			\$836
Families Below Poverty Level (2015)		11.63%	Unemployment Rate (2015)			6.2%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Albuquerque AA consists of the entire Albuquerque, NM MSA (Albuquerque MSA), which is comprised of Bernalillo, Sandoval, Torrance, and Valencia Counties. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Albuquerque MSA is the 60th largest metropolitan area in the U.S and the largest in the state of New Mexico. The current population is estimated at 907 thousand with 2 percent growth since the 2010 Census. The population is projected to increase at a faster pace as the economy strengthens and reach 926 thousand by 2020.

The banking environment is moderately competitive. There are 24 banks with 170 offices in the Albuquerque AA as of June 30, 2015. USB has a fifth place deposit rank with \$1 billion deposits, a 7 percent deposit market share, 19 branches, and 25 ATMs. Wells Fargo Bank has the largest share of area deposits (37 percent), followed by Bank of America (21 percent), Bank of the West (10 percent), and BOKF (9 percent). All other financial institutions have deposit market shares of 4 percent or less.

The local economy continues to recover, but is not particularly diverse. Economic drivers are government, defense, and the University of New Mexico (UNM) – and more specifically, the Kirtland Airforce Base, Sandia National Labs, and the UNM are among the top five employers. Other major employers include Presbyterian Healthcare Services and the UNM Hospital. New Mexico's state finances and declining tax revenues hinder economic growth. Layoffs at Intel's Rio Rancho plant have reduced the number of jobs in electronics and computer equipment manufacturing by more than half since the peak level in 2000. On the plus side, Albuquerque benefits from a stable base of education, healthcare, and scientific research jobs. And the high-tech industry is growing due to the area's low business costs and presence of federal research facilities. Area unemployment (6.2 percent) is slightly lower than the statewide rate for New Mexico (6.6 percent), but higher than the national average (5.3 percent). Poverty is a concern for Albuquerque, with an above-average share of area families living below poverty (11.6 percent) compared to the national average.

Economic struggles have depressed the housing market and are also reflected in low home sales and high foreclosure rates. Albuquerque's foreclosure rate of 0.14 percent is significantly higher than the statewide rate for New Mexico (0.08 percent) and the nation overall (0.06 percent).

The OCC relied on a community contact with a local economic development organization to better understand area credit needs and opportunities. The contact commented that small business access to capital is a primary credit. The contact was of the opinion that local financial institutions were diligent in meeting community needs.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include job creation/placement to offset high unemployment, financial products targeted to underserved/underbanked populations, financial education for consumers, financing for small businesses/farms, and affordable homes for purchase by LMI persons.

There are several opportunities to meet credit and community development needs in the Albuquerque AA. Albuquerque has a HUD-approved Consolidated Plan to address community needs, including affordable rental housing (rehab and assistance), neighborhood revitalization, community services for at-risk populations, and increased employment opportunities. Many community-based nonprofit organizations and five CDFIs serve the area. Severe storms and flooding during the evaluation period resulted in four major disaster declarations. Additionally, the area has several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and revitalization efforts.

North Dakota: Bismarck Assessment Area

2012-2015 Demographic Information for Full Scope Area: Bismarck Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	24	4.17	8.33	66.67	20.83	0.00
Population by Geography	108,779	3.60	7.95	69.18	19.27	0.00
Owner-Occupied Housing by Geography	31,688	4.58	7.50	68.54	19.39	0.00
Business by Geography	9,880	5.58	6.81	71.03	16.58	0.00
Farms by Geography	832	1.56	14.54	69.71	14.18	0.00
Family Distribution by Income Level	28,450	18.06	18.51	23.25	40.19	0.00
Distribution of LMI Families throughout AA Geographies	10,402	8.05	13.51	69.16	9.29	0.00
Median Family Income (2010)		\$67,178	Median Housing Value (2010)			\$139,165
Adjusted Median Family Income (2015)		\$77,000	Fair Market Two-Bedroom Rent (2015)			\$759
Families Below Poverty Level (2015)		6.07%	MSA Unemployment Rate (2015)			2.6%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Bismarck AA consists of two (of four) counties in the Bismarck, ND MSA (Bismarck MSA). The area includes Burleigh and Morton Counties. Oliver and Sioux Counties are excluded due to the large size of the MSA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Bismarck MSA is the 304th largest metropolitan area in the U.S. Bismarck is also the second largest city in the state of North Dakota. The MSA benefitted from favorable migration patterns over the evaluation period due to the oil boom in western North Dakota. The current population for the MSA is estimated at 130 thousand with nearly 13 percent growth since the 2010 Census. The MSA population is projected to increase more slowly and reach 136 thousand by 2020.

The banking environment is moderately competitive. There are 20 banks with 58 offices in the Bismarck AA as of June 30, 2015. USB has a third place deposit rank with \$485 million deposits, a 13 percent deposit market share, four branches, and seven ATMs. Wells Fargo Bank has the largest share of area deposits (21 percent), followed by Starion Financial (15 percent), USB (13 percent), Dakota Community Bank & Trust (11 percent), and BNC National Bank (9 percent). All other financial institutions have deposit market shares of 8 percent or less.

The local economy is strong and expanding due to the oil boom, which dramatically increased job opportunities in the energy sector, as well as ancillary sectors. Energy, state government, and health services are primary economic drivers. The diverse economy facilitates continued growth despite falling oil prices. The area also benefits from higher per capita income and very low costs of doing business. Major employers include Sanford Health, St. Alexius Medical Center, and Basic Electric Power Cooperative. The unemployment rate (2.6 percent) is among the lowest in the nation and comparable to the statewide rate for North Dakota (2.8 percent). The current median housing value for the MSA (\$237 thousand) is higher than values for the Midwest (\$176 thousand) and the nation overall (\$224 thousand).

The OCC relied on two recent community contacts with representatives from a local farm agency and economic development organization to better understand area credit needs and opportunities. Contacts spoke of needs for affordable housing stock in rural areas, as well as financing for agricultural operations and land. One contact was of the opinion that banks could be more involved with “EQ2” lending (long-term, deeply subordinated financing with features that make it function like equity). It was also mentioned that high labor costs present an obstacle for affordable housing construction projects in the area.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable housing for purchase or rent by LMI persons and programs for homeless persons.

There are several opportunities to meet credit and community development needs in the Bismarck AA. The city of Bismarck has a HUD-approved Consolidated Plan to address community needs, including affordable rental housing, increased homeownership opportunities, homelessness prevention, essential services for LMI persons, and improved public facilities. A variety of community-based, regional, and statewide community development organizations, and one CDFI, serve the area. Morton County had a major disaster declaration in 2013 due to a severe winter storm. This designation that typically allows financial support and/or incentives for specific economic and/or revitalization development efforts.

Ohio: Cleveland Assessment Area

2012-2015 Demographic Information for Full Scope Area: Cleveland Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	636	16.35	21.23	36.16	25.47	0.79
Population by Geography	2,077,240	10.38	17.42	38.71	33.49	0.01
Owner-Occupied Housing by Geography	575,920	5.68	13.81	41.98	38.53	0.01
Business by Geography	138,941	7.53	13.00	38.46	40.64	0.37
Farms by Geography	3,699	2.54	7.81	44.44	45.17	0.03
Family Distribution by Income Level	535,574	21.71	17.29	20.69	40.30	0.00
Distribution of LMI Families throughout AA Geographies	208,889	19.45	25.53	37.15	17.86	0.01
Median Family Income (2010)		\$62,627	Median Housing Value (2010)			\$151,321
Adjusted Median Family Income (2015)		\$66,100	Fair Market Two-Bedroom Rent (2015)			\$764
Families Below Poverty Level (2015)		10.29%	Unemployment Rate (2015)			5.0%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Cleveland AA consists of the entire Cleveland-Elyria, OH MSA (Cleveland MSA), which is comprised of Cuyahoga, Geauga, Lake, Lorain, and Medina Counties. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Cleveland MSA is the 31st largest metropolitan area in the U.S. and the second largest in the state of Ohio. The area has experienced unfavorable migration trends in recent years despite higher per capita income and a low cost of living. The current population is estimated at 2.06 million, a near 1 percent decline since the 2010 Census. The population is projected to decline to 2.04 million by 2020. Nearly one fourth of the population is aged 60+ years.

The banking environment is competitive. There are 37 banks with 691 offices in the Cleveland AA as of June 30, 2015. USB has a ninth place deposit rank with \$2.2 billion deposits, a 3 percent deposit market share, 59 branches, and 85 ATMs. KeyBank has the largest share of area deposits (28 percent), followed by PNC Bank (12 percent), Citizens Bank (9 percent), and Third Federal Savings and Loan Association of Cleveland (9 percent). All other financial institutions have deposit market shares less than 8 percent.

The local economy continues to recover and is diverse. Cleveland began as a manufacturing center due to its connection to canals and railroad lines on the shore of Lake Erie. Manufacturing still plays an important economic role, but white collar industries such as healthcare and financial services are driving growth. Manufacturing is underperforming due to a strong U.S. dollar and excess global supply of steel, which is hurting auto and steel manufacturers. Major employers include Cleveland Clinic, University Hospitals, Progressive Corp., Giant Eagle Inc., and General Motors Corp. Area unemployment (5.0 percent) has improved since 2012 (6.5 percent), is consistent with the statewide rate for Ohio (4.9 percent), and is lower than the national average (5.3 percent). Although the housing market has improved, the MSA foreclosure rate (0.12 percent) remains higher than foreclosure rates for the state of Ohio (0.09 percent) and the nation overall (0.06 percent).

The OCC relied on information from a CRA listening session at the Federal Reserve Bank of Cleveland to better understand area credit needs and opportunities. Many contacts attended the event, including representatives of housing organizations, banks, local government, and workforce development. The contacts spoke of a general lack of services in LMI areas, including banking facilities, public transit, and grocery stores. The contacts also mentioned needs for small business working capital, financial education, foreclosure prevention counseling, improved access to banking products and services, and job training.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include economic revitalization and/or economic development planning, financial education, financing for small businesses/farms, capacity building for nonprofit organizations, and financial products targeted to underserved/underbanked populations.

There are several opportunities to meet credit and community development needs in the Cleveland AA. The area has a number of HUD-approved Consolidated Plans to address community needs, including stand-alone local plans and a consortium plan led by Cuyahoga County. Many community-based nonprofit organizations and three CDFIs serve the area. The city of Cleveland is an Urban Round I Empowerment Zone, as well as a designated Enterprise Zone. Cuyahoga County was designated as a disaster area in 2013 due to Hurricane Sandy, and the MSA has many designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Ohio: Columbus Assessment Area

2012-2013 Demographic Information for Full Scope Area: Columbus Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	398	16.33	24.87	32.16	25.88	0.75
Population by Geography	1,740,801	11.29	21.22	36.76	30.10	0.63
Owner-Occupied Housing by Geography	425,720	5.60	18.51	39.69	36.20	0.00
Business by Geography	148,285	9.34	19.53	34.28	36.51	0.33
Farms by Geography	4,575	3.67	14.89	51.67	29.73	0.04
Family Distribution by Income Level	426,138	21.84	17.39	20.60	40.16	0.00
Distribution of LMI Families throughout AA Geographies	167,191	18.10	31.56	36.18	14.16	0.00
Median Family Income (2010) Adjusted Median Family Income (2013)		\$66,337 \$67,900	Median Housing Value (2010) MSA Unemployment Rate (2013)			\$165,098 6.5%
2014-2015 Demographic Information for Full Scope Area: Columbus Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	411	15.09	25.79	30.66	27.74	0.73
Population by Geography	1,806,239	10.39	22.27	34.42	32.31	0.60
Owner-Occupied Housing by Geography	444,401	5.00	19.78	36.93	38.29	0.00
Business by Geography	127,229	8.26	20.47	31.61	39.30	0.36
Farms by Geography	4,254	3.34	15.63	48.99	31.97	0.07
Family Distribution by Income Level	443,943	21.52	17.34	20.68	40.46	0.00
Distribution of LMI Families throughout AA Geographies	172,521	16.48	33.50	34.47	15.54	0.00
Median Family Income (2010) Adjusted Median Family Income (2015) Families Below Poverty Level (2015)		\$64,914 \$71,000 10.09%	Median Housing Value (2010) Fair Market Two-Bedroom Rent (2015) MSA Unemployment Rate (2015)			\$163,595 \$811 4.2%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Columbus AA consists of nine (of ten) counties in the Columbus, OH MSA (Columbus MSA). The area includes Delaware, Fairfield, Franklin, Hocking, Licking, Morrow, Perry, Pickaway, and Union Counties. Madison County is not included due to the large size of the MSA. Union County was added to the AA in 2014 when the bank opened a branch in the county. The OMB added Hocking and Perry Counties to the MSA as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Columbus MSA is the 32nd largest metropolitan area in the U.S and the third largest in the state of Ohio. Columbus is the largest city in the state and serves as the state capital. The Columbus MSA has experienced strong population growth over the past several years compared to other areas in the state and region. The current population for the MSA is estimated at 2.02 million with 6 percent growth since the 2010 Census. The MSA population is projected to continue growing and reach 2.14 million by 2020.

The banking environment is competitive. There are 57 banks with 555 offices in the Columbus AA as of June 30, 2015. USB has an eighth place deposit rank with \$1.4 billion deposits, a 2 percent deposit market share, 46 branches, and 55 ATMs. Huntington National Bank and JPMC hold most of the area's deposits, with a combined deposit market share of 52 percent. All other financial institutions have deposit market shares of 10 percent or less.

The local economy is strong, diverse, and expanding at a faster pace than the state of Ohio and nation overall. State government, financial services, and manufacturing are economic drivers. The area is home to several major U.S. and multinational corporations, including four FORTUNE 500 companies and two Global 500 companies, due to its low business costs and highly educated workforce. Ohio State University is the largest area employer and an economic anchor, attracting students and providing a skilled workforce. Other major employers include JPMorgan Chase & Co., OhioHealth, The Kroger Co., and Nationwide. Area unemployment (4.2 percent) has improved since 2012 (6.5 percent) and compares favorably to the statewide rate for Ohio (4.9 percent) and the national average (5.3 percent).

The OCC contacted a local financial intermediary and relied on a contact with a housing representative to better understand area credit needs and opportunities. One contact was of the opinion that banks were not actively serving small business credit needs. Contacts also expressed needs for revitalization of distressed neighborhoods and for more experienced bank lenders to assist LMI persons in qualifying for affordable housing and assistance programs.

There are several opportunities to meet credit and community development needs in the Columbus AA. Columbus and Franklin County have HUD-approved Consolidated Plans to address community needs, including affordable housing stock preservation and development, housing options for elderly residents, facilities and services for homeless persons, and self-sufficiency programs for LMI residents. Many community-based nonprofit organizations and three CDFIs serve the area. The city of Columbus is an Urban Round II Empowerment Zone, as well as a designated Enterprise Zone. There was a designated disaster within the MSA in 2012 due to severe storms, and there also are several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Oregon: Salem Assessment Area

2012-2015 Demographic Information for Full Scope Area: Salem Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	70	0.00	20.00	58.57	21.43	0.00
Population by Geography	390,738	0.00	21.03	56.99	21.98	0.00
Owner-Occupied Housing by Geography	89,039	0.00	11.87	60.16	27.96	0.00
Business by Geography	28,001	0.00	21.00	56.72	22.28	0.00
Farms by Geography	1,920	0.00	8.07	71.77	20.16	0.00
Family Distribution by Income Level	96,240	19.90	18.83	21.12	40.15	0.00
Distribution of LMI Families throughout AA Geographies	37,271	0.00	29.21	54.75	16.04	0.00
Median Family Income (2010)		\$56,016	Median Housing Value (2010)			\$213,365
Adjusted Median Family Income (2015)		\$57,200	Fair Market Two-Bedroom Rent (2015)			\$768
Families Below Poverty Level (2015)		11.14%	Unemployment Rate (2015)			5.9%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Salem AA consists of the entire Salem, OR MSA (Salem MSA), which is comprised of Marion and Polk Counties in northwest Oregon. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Salem MSA is the 130th largest metropolitan area in the U.S and the second largest in the state of Oregon. The current population is estimated at 410 thousand with 5 percent growth since the 2010 Census. The population is projected to increase at a similar pace and reach 432 thousand by 2020.

The banking environment is moderately competitive. There are 14 banks with 93 offices in the Salem AA as of June 30, 2015. Wells Fargo Bank has the largest share of area deposits (19 percent). USB has a second place deposit rank with \$890 million deposits, an 18 percent deposit market share, 17 branches, and 32 ATMs. Banks with the next largest share of area deposits are Columbia State Bank (14 percent) and JPMC (11 percent). All other financial institutions have deposit market shares less than 8 percent.

The local economy improved during the evaluation period, but is not particularly diverse. State government and agriculture are the economic drivers. Salem is the capital of Oregon, and government employment stabilizes the local economy. Close proximity to the Portland metropolitan area and low business costs also makes the area attractive for resident commuters and business. The agricultural sector is expanding due to a diverse crop, with local farmers faring much better than farmers in most other parts of the country. Major area employers include Salem Hospital, SuperMedia LLC, Association of Salem Kelzer Education Support, Fred Meyer Stores, and state government.

Per capita income is increasing, but it is still well below the state of Oregon and the nation overall. Consequently, the percentage of families living below poverty level is high (11.1 percent) compared to the national level (10.6 percent). Area unemployment (5.9 percent) has significantly improved since 2012 (9.8 percent), but is still higher than the statewide rate for Oregon (5.6 percent) and the national average (5.3 percent). The relatively high cost of housing, with consideration for income and poverty levels, makes home ownership difficult for low-income persons in this market.

The OCC contacted a community service representative and relied on an interagency CRA listening session to better understand area credit needs and opportunities. Contacts mentioned needs for affordable housing stock, financial education, as well as financing and technical assistance for small businesses, including micro-loans. There are opportunities for banks to collaborate with CDFIs, lend more to Native American businesses and communities, and participate in the statewide BankOn program, which brings organizations together to increase financial service access for unbanked/underbanked populations.

There are several opportunities to meet credit and community development needs in the Salem AA. Salem has a HUD-approved Consolidated Plan to address community priorities, including ending homelessness, expanding affordable housing, promoting economic development, and revitalizing low-income neighborhoods. Numerous community-based nonprofit organizations and two CDFIs serve the area. The city of Salem participates in the Oregon Enterprise Zone program. The area had a major disaster declaration in 2012 due to a winter storm, flooding, and landslides; and the MSA has some designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Oregon: Eastern Oregon Assessment Area

2012-2013 Demographic Information for Full Scope Area: Eastern Oregon Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	106	0.94	13.21	67.92	16.98	0.94
Population by Geography	445,155	0.75	11.22	68.74	19.29	0.00
Owner-Occupied Housing by Geography	115,323	0.38	9.06	68.74	21.82	0.00
Business by Geography	39,670	0.76	11.90	67.70	19.64	0.00
Farms by Geography	4,759	0.06	8.74	68.52	22.67	0.00
Family Distribution by Income Level	117,160	19.61	17.46	21.90	41.03	0.00
Distribution of LMI Families throughout AA Geographies	43,431	0.97	15.47	70.37	13.19	0.00
Median Family Income (2010) Adjusted Median Family Income (2013)		\$50,820 \$51,300	Median Housing Value (2010) County Unemployment Rates (2013)			\$175,381 6.3%-12.4%
2014-2015 Demographic Information for Full Scope Area: Eastern Oregon Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	85	1.18	10.59	74.12	12.94	1.18
Population by Geography	328,483	1.01	9.88	76.29	12.81	0.00
Owner-Occupied Housing by Geography	85,064	0.52	8.68	76.04	14.75	0.00
Business by Geography	23,977	1.08	9.61	76.18	13.12	0.00
Farms by Geography	3,232	0.09	5.45	79.02	15.44	0.00
Family Distribution by Income Level	86,750	20.03	17.45	22.10	40.42	0.00
Distribution of LMI Families throughout AA Geographies	32,515	1.29	13.68	76.61	8.41	0.00
Median Family Income (2010) Adjusted Median Family Income (2015) Families Below Poverty Level (2015)		\$50,374 \$53,900 11.81%	Median Housing Value (2010) Fair Market Two-Bedroom Rent (2015) County Unemployment Rates (2015)			\$171,766 \$643-\$845 4.7%-8.7%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Eastern Oregon AA consists of 12 contiguous, non-MSA counties in the state of Oregon. The area includes Baker, Crook, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Umatilla, Union, and Wasco Counties. The OMB made Linn County a metropolitan area as of 2014 (previously part of this AA). The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Eastern Oregon AA is primarily rural and spans nearly the entire eastern side of the state. The area includes both desert and rugged mountain terrain, with large portions of land that are undeveloped. The current population is estimated at 330 thousand (excluding Linn County) with less than 1 percent growth since the 2010 Census. Population trends vary by county with some counties experiencing significant growth (4.4 percent in Jefferson County) and others experiencing population decline (-3.5 percent in Grant county).

The banking environment is moderately competitive. There are 15 banks with 100 offices in the Eastern Oregon AA as of June 30, 2015. USB has a first place deposit rank with \$960 million deposits, a 23 percent deposit market share, 20 branches, and 27 ATMs. Banks with the next largest share of area deposits are Umpqua Bank (14 percent), Washington Federal (14 percent), and Banner Bank (10 percent). All other financial institutions have deposit market shares less than 10 percent.

Economic conditions vary across the area. Some eastern and central portions of the AA are doing well (including Crook, Jefferson, Hood River, and Wasco Counties), while other southeastern portions are stagnant (including Grant, Harney, and Malheur Counties). The local economy is dominated by agriculture production. Tourism is also a significant economic contributor due to the wide array of outdoor recreational activities available, including skiing, hiking, rafting, and boating. Other key economic sectors include services, retail trade, forestry, and fishing. The area's largest employers include: Diamond Fruit Growers in Hood River County; Sky Lakes Medical Center in Klamath County; Blue Mountain Community College and Good Shepard Health Care System in Umatilla County; Eastern Oregon University in Union County; and Mid-Columbia Medical Center, Oregon Cherry Growers, and Google in Wasco County. Area unemployment rates currently range from 4.7 percent in Hood River County to 8.7 percent in Grant County. Although unemployment has improved over the evaluation period, ten (of 12) counties in the AA have higher unemployment than the statewide rate for Oregon (5.6 percent), and 11 counties have higher rates than the national average (5.3 percent).

The OCC conducted three community contacts with affordable housing and economic development representatives to better understand area credit needs and opportunities. The contacts spoke of needs for affordable housing in general - and for migrant farm workers in particular - as well as subsidized lending for small business development. Contacts also mentioned the presence of several local organizations that provide community development investment and service opportunities for banks.

While there are several opportunities to meet credit and community development needs in the Eastern Oregon AA, community development lending opportunities are more restricted due to limited availability of soft funding and rental subsidies for affordable housing projects. One community contact was of the opinion that public entities infrequently allocated funds for affordable housing and economic development. A number of local and regional nonprofit organizations, as well as three statewide CDFIs, serve the area. The area also has 11 Rural Enterprise Zones, 36 census tracts designated as distressed (due to poverty, unemployment, or other factors), and several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and or revitalization efforts.

South Dakota: Sioux Falls Assessment Area

2012-2015: Demographic Information for Full Scope Area: Sioux Falls Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	53	0.00	26.42	50.94	22.64	0.00
Population by Geography	214,296	0.00	26.05	50.94	23.00	0.00
Owner-Occupied Housing by Geography	55,160	0.00	19.40	54.78	25.82	0.00
Business by Geography	17,234	0.00	35.61	42.97	21.42	0.00
Farms by Geography	1,270	0.00	7.64	70.31	22.05	0.00
Family Distribution by Income Level	54,233	17.76	17.81	26.15	38.28	0.00
Distribution of LMI Families throughout AA Geographies	19,288	0.00	38.95	48.26	12.79	0.00
Median Family Income (2010)		\$66,496	Median Housing Value (2010)			\$150,614
Adjusted Median Family Income (2015)		\$71,000	Fair Market Two-Bedroom Rent (2015)			\$711
Families Below Poverty Level (2015)		5.96%	MSA Unemployment Rate (2015)			2.6%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Sioux Falls AA consists of Lincoln and Minnehaha Counties in the Sioux Falls, SD MSA (Sioux Falls MSA). The AA excludes McCook and Turner Counties as the MSA is too large to serve. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Sioux Falls MSA is the 186th largest metropolitan area in the U.S. and the largest in the state of South Dakota. The MSA experienced steady population growth during the evaluation period, and was among the fastest growing areas in the region during 2015. The current population for the MSA is estimated at 252 thousand with 10 percent growth since the 2010 Census. The MSA population is projected to continue growing, fueled by a surplus of available jobs and low cost of living.

The banking environment is moderately competitive. There are 28 banks with 126 branches in the Sioux Falls AA as of June 30, 2015. Citibank and Wells Fargo Bank dominate the market with a combined deposit market share of 98 percent. The other 26 banks have deposit market shares less than 1 percent each. USB has an eighth place deposit rank with \$440 million deposits, ten branches, and 27 ATMs.

The local economy is expanding and relatively diverse. Financial services and health services are the economic drivers. The area benefits from high educational attainment and relatively low business costs. A heavy concentration of financial service jobs is due to the presence of several credit card processing centers in the area. Major employers include Sanford Health, Avera McKennan Health Services, John Morrell & Co., Wells Fargo, Hy-Vee, Inc., and Citibank NA. Area employment trends consistently outperform statewide and nation performance. The unemployment rate (2.6 percent) is among the lowest in the nation, and compares favorably to the statewide rate for South Dakota (3.1 percent) and the national average (5.3 percent).

Housing values are increasing due to population/job growth and limited housing inventory. The median sales price of an existing single family home in the MSA increased 12 percent between 2013 and 2015 (from \$156 thousand to \$174 thousand). Strong housing demand has also reduced the number of foreclosed properties.

The OCC contacted a community planning and economic development representative to better understand area credit needs and opportunities. The contact mentioned a significant need for quality, affordable housing for low-income persons. The contact was also of the opinion that there was no lack of bank products/services in the area, and that plentiful opportunities for bank participation still existed despite the large number of financial institutions serving the area.

There are several opportunities to meet credit and community development needs in the Sioux Falls AA. The city of Sioux Falls has a Consolidated Plan to address community needs, including core neighborhood redevelopment and revitalization, affordable housing, homeownership assistance, self-sufficiency programs, fair housing education and outreach, and accessibility modifications for public facilities. Numerous community-based nonprofit organizations and three CDFI loan funds serve the area. The area also has several designated Brownfield sites.

Tennessee: Nashville Assessment Area

2012-2013 Demographic Information for Full Scope Area: Nashville Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	343	9.33	20.70	40.52	28.28	1.17
Population by Geography	1,502,159	7.47	20.06	41.45	30.70	0.33
Owner-Occupied Housing by Geography	383,233	3.50	16.16	45.33	35.01	0.00
Business by Geography	140,542	8.07	19.13	35.02	37.05	0.73
Farms by Geography	3,775	2.60	14.68	52.82	29.67	0.24
Family Distribution by Income Level	372,958	20.17	17.57	21.15	41.11	0.00
Distribution of LMI Families throughout AA Geographies	140,756	12.55	29.54	42.40	15.48	0.03
Median Family Income (2010)		\$63,006	Median Housing Value (2010)			\$193,486
Adjusted Median Family Income (2013)		\$62,300	MSA Unemployment Rate (2013)			6.2%
2014-2015 Demographic Information for Full Scope Area: Nashville Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	360	8.89	19.17	42.50	28.33	1.11
Population by Geography	1,583,115	7.20	18.61	43.04	30.84	0.31
Owner-Occupied Housing by Geography	406,299	3.48	14.56	46.83	35.12	0.00
Business by Geography	116,373	7.38	18.51	35.70	37.54	0.87
Farms by Geography	3,443	2.50	13.51	54.37	29.39	0.23
Family Distribution by Income Level	395,115	20.00	17.57	21.31	41.12	0.00
Distribution of LMI Families throughout AA Geographies	148,455	12.34	27.55	44.43	15.65	0.03
Median Family Income (2010)		\$62,315	Median Housing Value (2010)			\$190,358
Adjusted Median Family Income (2015)		\$67,100	Fair Market Two-Bedroom Rent (2015)			\$850
Families Below Poverty Level (2015)		9.41%	MSA Unemployment Rate (2015)			4.6%

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

Source: Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Nashville AA consists of nine (of 14) counties in the Nashville-Davidson-Murfreesboro-Franklin, TN MSA (Nashville MSA). The area includes Cheatham, Davidson, Dickson, Maury, Robertson, Rutherford, Sumner, Williamson, and Wilson Counties. Cannon, Hickman, Macon, Smith, and Trousdale Counties are not included in the AA due to the large size of the MSA. The OMB added Maury County to the MSA as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Nashville MSA is the 36th largest metropolitan area in the U.S. It also is the fastest growing metropolitan area in the state of Tennessee, primarily due to healthy in-migration trends. The current population for the MSA is estimated at 1.83 million with nearly 10 percent growth since the 2010 Census. The MSA population is projected to increase at a slower pace and reach 1.95 million by 2020.

The banking environment is very competitive. There are 62 banks with 566 offices in the Nashville AA as of June 30, 2015. USB has a sixth place deposit rank with \$1.6 billion deposits, a 4 percent deposit market share, 55 branches, and 59 ATMs. Bank of America has the largest share of area deposits (18 percent), followed by Regions Bank (15 percent), and SunTrust Bank (13 percent). All other financial institutions have deposit market shares of 9 percent or less.

The local economy is expanding and diverse. Economic drivers are tourism, manufacturing, and government. The area is home to one Global 500 and six FORTUNE 500 companies and benefits from relatively low costs of doing business. Nashville is a major recording and production center for the country music industry. This industry brings many tourists to the area for live performances and attractions such as the Grand Ole Opry and the Country Music Hall of Fame. The automotive industry is also an important contributor, supporting one in three manufacturing jobs. Nissan North America, which relocated to the area in 2006, provides more than 10,000 jobs and is the area's second largest employer. Other major employers include Vanderbilt University & Medical Center, HCA Inc., Saint Thomas Health Services, and Gaylord Entertainment Co. Area unemployment (4.6 percent) is near its pre-recession level and compares favorably to the statewide rate for Tennessee (5.8 percent) and the national average (5.3 percent).

The Nashville housing market is exceptionally strong. Home values are rising faster than the national average due to strong demand from a growing population. The median sales price of an existing single-family home in the Nashville MSA increased 18 percent between 2013 and 2015 (from \$176 thousand to \$207 thousand).

The OCC relied on two recent community contacts to better understand area credit needs and opportunities. Contacts spoke of an inadequate supply of affordable housing for LMI persons. As explained by one contact, area housing vacancy rates are low and new construction has focused on upper-income housing. Displacement of LMI persons from certain neighborhoods has also become an issue.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable housing for purchase or rent by LMI persons, job creation/placement to offset unemployment, financial education, and financial products targeted to underserved/ underbanked populations.

There are several opportunities to meet credit and community development needs in the Nashville AA. Numerous community-based nonprofit organizations and five CDFIs serve the area. There were three major disaster declarations during the evaluation period, and the area has several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Utah: Salt Lake City Assessment Area

2012-2013 Demographic Information for Full Scope Area: Salt Lake City Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	225	5.33	18.67	45.78	29.33	0.89
Population by Geography	1,065,979	4.52	17.99	49.11	28.02	0.36
Owner-Occupied Housing by Geography	239,760	2.41	13.61	51.26	32.72	0.00
Business by Geography	115,017	4.40	17.66	42.64	34.86	0.44
Farms by Geography	1,876	3.09	13.01	45.84	37.95	0.11
Family Distribution by Income Level	246,576	18.61	18.67	22.58	40.13	0.00
Distribution of LMI Families throughout AA Geographies	91,932	8.20	27.61	48.54	15.65	0.00
Median Family Income (2010)		\$68,010	Median Housing Value (2010)			\$272,604
Adjusted Median Family Income (2013)		\$70,300	MSA Unemployment Rate (2013)			4.4%
2014-2015 Demographic Information for Full Scope Area: Salt Lake City Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	212	5.19	19.34	46.23	28.30	0.94
Population by Geography	1,029,655	4.12	18.35	50.07	27.09	0.37
Owner-Occupied Housing by Geography	229,637	2.07	13.75	52.53	31.64	0.00
Business by Geography	88,910	4.75	19.03	43.44	32.25	0.52
Farms by Geography	1,446	3.46	16.25	44.95	35.20	0.14
Family Distribution by Income Level	236,504	18.33	18.66	22.81	40.20	0.00
Distribution of LMI Families throughout AA Geographies	87,479	7.48	28.58	48.88	15.06	0.00
Median Family Income (2010)		\$67,016	Median Housing Value (2010)			\$252,807
Adjusted Median Family Income (2015)		\$72,500	Fair Market Two-Bedroom rent (2015)			\$901
Families Below Poverty Level (2015)		7.43%	MSA Unemployment Rate (2015)			3.4%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Salt Lake City AA consists of one (of two) counties in the Salt Lake City, UT MSA (Salt Lake City MSA). The AA includes Salt Lake County, but excludes Tooele County due to the size of the MSA. The OMB removed Summit County from the MSA as of 2014. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics for the entire evaluation period are presented in the tables above.

The Salt Lake City MSA is the 48th largest metropolitan area in the U.S. Salt Lake City is also the most populated city in the state of Utah. The current population for the MSA is estimated at 1.17 million with strong growth of nearly 8 percent since the 2010 Census. The MSA population is projected to continue growing at a similar pace and reach 1.25 million by 2020.

The banking environment is moderately competitive. There are 44 banks with 236 offices in the Salt Lake City AA as of June 30, 2015. Morgan Stanley Bank has the largest share of area deposits (23 percent), followed by Goldman Sachs Bank (16 percent), and Ally Bank (13 percent). All other financial institutions have deposit market shares less than 9 percent. USB has a 19th place deposit rank with \$1.6 billion deposits and less than 1 percent deposit market share, 39 branches, and 49 ATMs. USB has the third highest number of branches, after Wells Fargo Bank (41 branches) and Zions First National Bank (40 branches).

Salt Lake is one of the healthiest large metropolitan economies in the West, benefitting from low business costs and a young, well-educated population. Financial services, tourism, and state government are economic drivers, with increasing impact from high tech startups as business costs escalate in Silicon Valley. The area is home to one FORTUNE 500 company. Major employers include Intermountain Health Care Inc., University of Utah, World Financial Capital Bank, and Comenity Capital Bank. The unemployment rate (3.4 percent) is among the lowest in the nation for large metropolitan areas and in line with the statewide rate for Utah (3.5 percent). The strong economy has contributed to job growth, higher wages, and increased housing values, although the area continues to have below-average per capita income and higher costs of living.

The OCC contacted a small business loan fund representative to better understand area credit needs and opportunities. The contact expressed several small business needs, including low-cost lines of credit, startup loans, EQ2 investments, and grants. The contact was of the opinion that bank credit standards make it difficult for many small businesses to qualify for financing.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include affordable homes for purchase by LMI persons, home improvement loans, job creation/placement, as well as financing and technical assistance for small businesses/farms.

There are several opportunities to meet credit and community development needs in the Salt Lake AA. Both the city and county of Salt Lake have HUD-approved Consolidated Plans to address community needs, including affordable housing development and preservation, rental housing assistance, programs for homeless persons, economic development, expansion of public services, and public infrastructure improvements. Many community-based nonprofit organizations and three CDFI loan funds serve the area. Salt Lake County also has several designated Brownfield sites.

Washington: Seattle Assessment Area

2012-2015 Demographic Information for Full Scope Area: Seattle Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	549	4.55	20.58	45.72	28.42	0.73
Population by Geography	2,644,584	4.50	20.34	47.23	27.72	0.22
Owner-Occupied Housing by Geography	648,302	1.84	15.62	49.34	33.20	0.00
Business by Geography	243,178	4.69	17.27	44.19	33.72	0.13
Farms by Geography	4,950	2.24	14.97	51.70	31.07	0.02
Family Distribution by Income Level	636,092	20.39	17.77	22.17	39.67	0.00
Distribution of LMI Families throughout AA Geographies	242,717	6.51	30.20	47.44	15.84	0.00
Median Family Income (2010)		\$83,852	Median Housing Value (2010)			\$405,176
Adjusted Median Family Income (2015)		\$89,600	MSA Fair Market Two-Bedroom Rent (2015)			\$1,415
Families Below Poverty Level (2015)		6.25%	Unemployment Rate (2015)			4.3%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Seattle AA consists of the entire Seattle-Bellevue-Everett, WA MD (Seattle MD), which is comprised of King and Snohomish Counties. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Seattle MD is part of the Seattle-Tacoma-Bellevue, WA MSA and the 15th largest metropolitan area in the U.S. The current population for the Seattle AA is estimated at 2.9 million with 9 percent growth since the 2010 Census. Population growth is more than double the national rate, and primarily attributable to net migration of younger workers. The population is projected to continue growing and reach 3.1 million by 2020.

The banking environment is very competitive. There are 49 banks with 726 offices in the Seattle AA as of June 30, 2015. USB has a fourth place deposit rank with \$8.9 billion deposits, an 11 percent deposit market share, 70 branches, and 158 ATMs. Bank of America has the largest share of area deposits (28 percent), followed by Wells Fargo Bank (14 percent), and JPMC (11 percent). All other financial institutions have deposit market shares of 8 percent or less.

The local economy is strong, but not particularly diverse. Logistics, high tech, and manufacturing are economic drivers. The area is home to three Global 500 and eight FORTUNE 500 companies, including Costco, Amazon, Microsoft, and Starbucks. Boeing, the largest aerospace company in the world, was previously headquartered in Seattle and still ranks as the area's largest employer. Other major employers include Microsoft Corp., the University of Washington, and Amazon. Seattle became a technology center in the 1980s with the founding of Microsoft, and expanded further when the internet retailer Amazon established headquarters there. Job growth in the information technology and internet retail industries has helped the economy offset layoffs at Boeing. Area unemployment (4.3 percent) compares favorably to the statewide rate for Washington (5.6 percent) and the national average (5.3 percent).

Workers are attracted to the area's expanding economy, job growth, and higher per capita income, although higher income is offset by a 23 percent higher cost of living compared to the nation overall. The area also suffers from an inadequate housing supply, with Snohomish and King Counties having the lowest supply in the state of Washington. The median housing value increased dramatically between 2011 and 2015, from \$263 thousand to \$399 thousand (or 52 percent). The high cost of housing makes home ownership largely unattainable for low-income persons in this market.

The OCC conducted three community contacts with CDFI representatives and a grassroots community group to better understand area credit needs and opportunities. The contacts expressed needs for affordable housing stock, financial education for LMI persons, lower cost capital, predevelopment financing, as well as loans and investments supporting nonprofit organizations and CDFIs.

USB conducted external surveys in 2013 and 2015 to assess community needs. Needs identified through the surveys include affordable rental housing, capacity building for nonprofit organizations, financial education, job creation/placement, programs for homeless persons, and financial products targeted to underserved/underbanked populations.

There are significant opportunities to meet credit and community development needs in the Seattle AA. Numerous community-based nonprofit organizations and eight CDFIs serve the area. A number of natural disasters occurred during the evaluation period, resulting in four major disaster declarations. The MSA also has several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Wisconsin: Madison Assessment Area

2012-2013 Demographic Information for Full Scope Area: Madison Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	119	7.56	15.13	53.78	21.01	2.52
Population by Geography	544,906	6.23	14.99	57.05	21.15	0.58
Owner-Occupied Housing by Geography	139,232	1.53	12.11	63.03	23.33	0.00
Business by Geography	39,379	4.32	15.41	56.07	23.63	0.57
Farms by Geography	2,109	0.42	4.41	74.78	20.13	0.25
Family Distribution by Income Level	129,417	18.37	17.96	24.91	38.76	0.00
Distribution of LMI Families throughout AA Geographies	45,781	6.01	21.99	58.71	13.29	0.00
Median Family Income (2010) Adjusted Median Family Income (2013)		\$78,201 \$80,900	Median Housing Value (2010) MSA Unemployment Rate (2013)			\$228,201 5.0%
2014-2015 Demographic Information for Full Scope Area: Madison Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	119	6.72	13.45	54.62	22.69	2.52
Population by Geography	544,906	5.72	12.83	57.40	23.47	0.58
Owner-Occupied Housing by Geography	139,232	1.48	9.97	62.54	26.01	0.00
Business by Geography	39,379	3.92	13.05	56.09	26.30	0.64
Farms by Geography	2,109	0.33	4.22	72.02	23.23	0.19
Family Distribution by Income Level	129,417	17.88	17.50	24.50	40.12	0.00
Distribution of LMI Families throughout AA Geographies	45,781	4.68	20.20	60.31	14.80	0.00
Median Family Income (2010) Adjusted Median Family Income (2015) Families Below Poverty Level (2015)		\$76,735 \$82,800 5.38%	Median Housing Value (2010) Fair Market Two-Bedroom Rent (2015) MSA Unemployment Rate (2015)			\$228,201 \$928 3.4%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Madison AA consists of two (of four) counties in the Madison, WI MSA (Madison MSA), including Dane and Colombia Counties. Green and Iowa Counties are excluded from the AA due to the size of the MSA. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. The OMB added Green County to the MSA as of 2014. Area demographics for the entire evaluation period are presented in the tables above.

The Madison MSA is the 88th largest metropolitan area in the U.S. and the second largest in the state of Wisconsin. The current population for the MSA is estimated at 641 thousand with 6 percent growth since the 2010 Census. The MSA population is projected to increase at a slower pace and reach 667 thousand by 2020.

The banking environment is competitive. There are 47 banks with 208 branches in the Madison AA as of June 30, 2015. BMO Harris Bank has the largest share of deposits (16 percent). USB has a second place deposit rank with \$1.6 billion deposits, an 11 percent deposit market share, 12 branches, and 19 ATMs. Banks with the next largest share of area deposits are Associated Bank (8 percent) and First Business Bank (7 percent). All other financial institutions have deposit shares of 6 percent or less.

Madison is the state capital and home to the largest public university in the state, the University of Wisconsin-Madison. Madison is also home to one FORTUNE 500 company (American Family Insurance Group). State government and the University are the dominant economic influences, employing one-quarter of the local workforce. Other major employers include UW Hospital & Clinics Authority, American Family Insurance Co., WPS Health Insurance, Meriter Health Services Inc., and Dean Health Systems S.C.

The local economy is expanding and evolving from a government-based economy to a consumer services and high-tech base, particularly in the areas of health, biotech, and advertising. The University is a center for high-tech and bio-tech research and facilities, providing the area with a highly-educated work force to support further growth. The area also benefits from higher per capita income, consistent in-migration, and strong consumer demand. Area unemployment (3.4 percent) is at the pre-recession level and compares favorably to the statewide rate for Wisconsin (4.5 percent) and the national average (5.3 percent).

The OCC conducted community contacts with a housing development organization and a CDFI representative to better understand area credit needs and opportunities. Contacts spoke of needs for improved access to home loans, small business financing, and deposit accounts for underbanked populations. Affordable housing supply has also become a concern with increasing home values, rental prices, and the gentrification of inner-city neighborhoods. As a result, LMI residents are being priced out of housing or are rent-stressed. One contact was of the opinion that banks are unwilling to finance affordable housing outside of LIHTCs.

There are several opportunities to meet credit and community development needs in the Madison AA. The city of Madison has a Consolidated Plan to address community needs, including affordable housing; housing assistance for homebuyers, renters, and homeless/special need populations; economic development; small business development; and adult workforce preparedness. Numerous community-based nonprofit organizations and two CDFIs serve the area. The MSA also has several designated Brownfield sites.

Wisconsin: Milwaukee Assessment Area

2012-2015: Demographic Information for Full Scope Area: Milwaukee Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	429	20.05	17.95	35.20	26.57	0.23
Population by Geography	1,555,908	14.65	16.20	36.13	33.02	0.00
Owner-Occupied Housing by Geography	386,906	6.74	12.89	39.84	40.52	0.00
Business by Geography	83,064	9.02	13.85	38.82	38.28	0.03
Farms by Geography	1,898	3.00	7.17	43.84	46.00	0.00
Family Distribution by Income Level	389,825	22.15	16.90	20.61	40.35	0.00
Distribution of LMI Families throughout AA Geographies	152,194	25.76	23.63	33.19	17.42	0.00
Median Family Income (2010)		\$68,787	Median Housing Value (2010)			\$203,186
Adjusted Median Family Income (2015)		\$73,300	Fair Market Two-Bedroom Rent (2015)			\$896
Families Below Poverty Level (2015)		9.69%	Unemployment Rate (2015)			4.9%

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

Source: US Census, FFIEC, Bureau of Labor Statistics, and National Association of Realtors

The Milwaukee AA consists of the entire Milwaukee-Waukesha-West Allis, WI MSA (Milwaukee MSA), which is comprised of Milwaukee, Ozaukee, Washington, and Waukesha Counties. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the above table.

The Milwaukee MSA is the 39th largest metropolitan area in the U.S. and the largest in the state of Wisconsin. Population growth has slowed in recent years due to weak migration. The current population is estimated at 1.58 million with 1 percent growth since the 2010 Census. The population is projected to increase at a similar pace and reach 1.6 million by 2020.

The banking environment is very competitive. There are 52 banks with 550 branches in the Milwaukee AA as of June 30, 2015. USB has a first place deposit rank with \$26 billion deposits, a 40 percent deposit market share, 53 branches, and 93 ATMs. A significant portion of the deposits that USB attributes to this AA (\$15.4 billion or 59 percent) are non-local deposits that have been centralized for administrative purposes. The bank's level of local deposits (\$10.6 billion) is a contextual consideration for this AA. Banks with the next largest share of area deposits are BMO Harris (\$8.8 billion; 14 percent), JPMC (10 percent), and Associated Bank (9 percent). All other financial institutions have market shares of 3 percent or less.

The local economy continues to recover and is diverse, but relies heavily on manufacturing. While weakened demand for manufacturing has affected output and employment, the education and health care sectors provide economic stability. The area also benefits from a well-educated workforce and above-average per capita income. Greater Milwaukee is home to two Global 500 and six FORTUNE 500 companies, including Johnson Controls, Northwestern Mutual, ManpowerGroup, and Kohls. Major employers include Aurora Health Care Inc., Wheaton Franciscan Healthcare, Froedtert and Community Health, Roundy's Inc., and Kohl's Department Stores. Area unemployment (5.0 percent) has improved since 2012 (7.5 percent), but is still above the statewide average for Wisconsin (4.5 percent).

The OCC contacted a community foundation and relied on a recent contact with an economic development representative to better understand area credit needs and opportunities. One contact expressed a need for small business financing and was of the opinion that capital was not readily available for business development in LMI areas. The contact also noted opportunities for banks to capitalize loan pools for affordable home purchase and improvement lending. Homeownership has plummeted in older neighborhoods and according to the contact, there has been no subsequent reinvestment in these areas. Another contact stated there are many economic development opportunities available, specifically within the 30th Street industrial corridor and between Martin Luther King Drive and North Ave.

USB conducted an external survey in 2015 to assess community needs. Needs identified through the survey include job creation/placement to offset unemployment, financing for small businesses, economic revitalization and/or economic development planning, financial education, and affordable housing for LMI persons.

There are significant opportunities to meet credit and community development needs in the Milwaukee AA. Numerous nonprofit organizations and twelve CDFIs serve the area. Milwaukee has an Urban Renewal Community designation covering the greater downtown area, and much of the city qualifies as a SBA Historically Underutilized Business Zone. The area also has several designated Brownfield sites. These designations typically allow financial support and/or incentives for specific economic development and/or revitalization efforts.

Wyoming: Cheyenne Assessment Area

2012-2015 Demographic Information for Full Scope Area: Cheyenne Assessment Area						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	21	0.00	28.57	42.86	23.81	4.76
Population by Geography	91,738	0.00	28.98	49.89	21.13	0.00
Owner-Occupied Housing by Geography	24,689	0.00	26.87	47.27	25.86	0.00
Business by Geography	7,486	0.00	45.12	30.59	23.67	0.61
Farms by Geography	303	0.00	14.85	57.43	27.72	0.00
Family Distribution by Income Level	23,771	18.47	19.06	23.89	38.58	0.00
Distribution LMI Families throughout AA Geographies	8,921	0.00	41.48	47.56	10.96	0.00
Median Family Income (2010)		\$64,589	Median Housing Value (2010)			\$165,828
Adjusted Median Family Income (2015)		\$72,000	Fair Market Two-Bedroom Rent (2015)			\$798
Families Below Poverty Level (2015)		6.68%	Unemployment Rate (2015)			3.9%

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

Source: US Census, FFIEC, Bureau of Labor Statistics (not seasonally adjusted), and National Association of Realtors

The Cheyenne AA consists of the entire Cheyenne, WY MSA (Cheyenne MSA), which is comprised of Laramie County. The AA meets regulatory requirements and does not arbitrarily exclude LMI census tracts. Area demographics are presented in the table above.

The Cheyenne MSA is the 360th largest metropolitan area in the U.S. Cheyenne is also the most populated city in the state and serves as the state capital. The current population is estimated at 97 thousand with 6 percent growth since the 2010 Census. The population is projected to continue growing and reach 99 thousand by 2020.

The banking environment is moderately competitive. There are 19 banks with 30 offices in the Cheyenne AA as of June 30, 2015. USB has a seventh place deposit rank with \$89.4 million deposits, a 6 percent deposit market share, two branches, and two ATMs. Wells Fargo Bank has the largest share of area deposits (23 percent), followed by ANB Bank (17 percent), and First Interstate Bank (11 percent). All other financial institutions have deposit market shares less than 9 percent.

The local economy remains in recession and is not particularly diverse. Economic drivers are state government, military, and energy-related industries. While falling oil prices reduced demand for energy-dependent/high-value services and decreased state revenues, the government and military sectors provided employment stability. State and local government employ one in four workers, and the F.E. Warren Air Force Base is the area's largest employer. Other major employers include Cheyenne Regional Medical Center and the Wyoming National Guard. Area unemployment (3.9 percent) still compares favorably to the statewide rate for Wyoming (4.2 percent) and the national average (5.3 percent).

The OCC contacted a regional housing authority to better understand area credit needs and opportunities. The contact expressed needs for affordable housing stock, credit opportunities for first time homebuyers, and capacity building for nonprofit organizations. The contact also noted a lack of affordable rental housing due to the military base presence.

There are several opportunities to meet credit and community development needs in the Cheyenne AA. The city of Cheyenne has a HUD-approved Consolidated Plan to address community needs, including housing rehabilitation, neighborhood improvements, job training, community services for LMI and special need populations, and public infrastructure improvements. The area has a number of community-based and regional nonprofit organizations, as well as many designated Brownfield sites.

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Evaluation). 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 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

Table 2. Geographic Distribution of Home Purchase Loans - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

Table 3. Geographic Distribution of Home Improvement Loans - See Table 2.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans - See Table 2.

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

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

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

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

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

National & Regional Table

COMMUNITY DEVELOPMENT LOANS & INVESTMENTS										
Geography: NATIONAL & REGIONAL										
Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015										
	Community Development Loans*		Qualified Investments							
	#	\$(000's)	Prior Period Investments**		Current Period Investments*		Total Investments		Unfunded Commitments***	
			#	\$(000's)	#	\$(000's)	#	\$(000's)	#	\$(000's)
National/Regional Investments that Serve AAs										
National	42	255,824	28	38,745	54	2,024	82	40,769	0	0
South Atlantic Division	1	4,994	0	0	1	3	1	3	0	0
National/Regional Investments Outside AAs										
East North Central Division	0	0	5	4,657	94	102,137	99	106,794	4	10,490
South Atlantic Division	8	103,415	28	28,683	707	587,268	735	615,951	30	64,962
East South Central Division	1	6,600	5	3,934	99	193,893	104	197,827	8	11,755
West South Central Division	6	82,800	18	21,820	756	556,252	774	578,072	23	33,579
Pacific Division	2	12,295	5	7,826	49	48,295	54	56,121	3	68

* The evaluation period for Community Development Loans and Current Period Investments is April 1, 2012 to December 31, 2015.

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

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

The East North Central Division consists of Illinois, Indiana, Michigan, Ohio, and Wisconsin

The South Atlantic Division consists of Delaware, District of Columbia, Florida, Georgia, Maryland, North Carolina, South Carolina, Virginia, and West Virginia

The East South Central Division consists of Alabama, Kentucky, Mississippi, and Tennessee

The West South Central Division consists of Arkansas, Louisiana, Oklahoma, and Texas

The Pacific Division consists of Alaska, California, Hawaii, Oregon, and Washington

Table 1. Lending Volume

LENDING VOLUME												
Geography: CHICAGO MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	44.75	27,467	6,561,211	18,141	427,727	21	521	27	159,339	45,656	7,148,798	47.58
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	41.39	17,629	3,551,427	24,494	659,383	84	1,088	21	114,468	42,228	4,326,366	45.83
Limited Review:												
Elgin, IL MD 2014-2015	3.54	1,671	298,054	1,918	38,302	21	345	0	0	3,610	336,701	1.75
Lake County–Kenosha County, IL–WI MD	10.32	5,038	1,266,080	5,441	131,038	44	886	4	17,666	10,527	1,415,670	4.84

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.

*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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-Naperville-Arlington Heights, IL MD 2012-2013	7,191	33.13	4.00	2.31	18.06	13.57	37.39	36.82	40.55	47.30	3.29	3.41	4.04	3.59	2.87
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	11,528	53.11	4.23	2.91	16.89	17.30	37.75	44.53	41.14	35.26	5.26	5.69	6.84	6.30	3.99
Limited Review:															
Elgin, IL MD 2014-2015	1,149	5.29	0.36	0.17	28.69	29.68	34.53	36.21	36.41	33.94	5.75	3.03	7.68	5.82	4.79
Lake County–Kenosha County, IL–WI MD	1,839	8.47	3.82	2.23	18.50	16.86	42.03	44.05	35.66	36.87	4.20	3.83	6.70	4.21	3.11

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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-Naperville-Arlington Heights, IL MD 2012-2013	587	40.18	4.00	3.92	18.06	14.65	37.39	26.41	40.55	55.03	8.11	4.56	6.29	6.50	10.30
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	730	49.97	4.23	4.79	16.89	20.41	37.75	32.19	41.14	42.60	7.53	9.84	10.42	6.97	6.79
Limited Review:															
Elgin, IL MD 2014-2015	27	1.85	0.36	0.00	28.69	22.22	34.53	22.22	36.41	55.56	4.40	0.00	7.02	3.08	4.55
Lake County–Kenosha County, IL–WI MD	117	8.01	3.82	2.56	18.50	13.68	42.03	50.43	35.66	33.33	4.27	7.69	6.38	4.90	2.69

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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-Naperville-Arlington Heights, IL MD 2012-2013	19,610	69.02	4.00	1.12	18.06	7.01	37.39	29.66	40.55	62.21	3.66	2.04	2.66	3.50	4.07
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	5,251	18.48	4.23	1.64	16.89	10.38	37.75	33.46	41.14	54.52	3.19	1.99	3.13	3.15	3.28
Limited Review:															
Elgin, IL MD 2014-2015	489	1.72	0.36	0.20	28.69	12.27	34.53	33.54	36.41	53.99	3.68	4.17	2.94	3.56	3.98
Lake County–Kenosha County, IL–WI MD	3,061	10.77	3.82	1.47	18.50	8.36	42.03	37.34	35.66	52.83	2.56	3.01	2.89	2.72	2.33

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	79	34.96	12.08	13.92	22.64	45.57	32.48	20.25	32.80	20.25	2.62	2.90	3.68	1.75	2.21
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	120	53.10	12.30	19.17	21.79	25.00	32.32	42.50	33.59	13.33	3.34	4.69	3.27	4.38	1.26
Limited Review:															
Elgin, IL MD 2014-2015	6	2.65	3.01	16.67	48.93	50.00	35.91	16.67	12.15	16.67	1.72	0.00	4.55	0.00	0.00
Lake County–Kenosha County, IL–WI MD	21	9.29	11.15	19.05	32.32	52.38	42.18	14.29	14.35	14.29	7.78	13.33	10.00	0.00	12.50

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: CHICAGO MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	18,141	36.30	4.96	3.26	15.94	15.77	32.66	34.19	46.32	46.78	7.99	7.71	8.83	8.05	7.59
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	24,475	48.97	4.79	4.41	15.11	16.22	32.01	35.16	47.94	44.21	8.75	10.94	9.45	9.20	8.01
Limited Review:															
Elgin, IL MD 2014-2015	1,918	3.84	2.07	1.93	22.32	16.68	40.23	43.95	35.38	37.43	10.18	11.22	9.36	11.20	9.22
Lake County–Kenosha County, IL–WI MD	5,441	10.89	3.70	4.61	14.48	14.37	37.71	44.68	44.10	36.34	7.74	14.69	9.46	9.04	5.71

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: CHICAGO MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	21	12.35	2.54	0.00	12.68	4.76	39.96	66.67	44.78	28.57	4.18	0.00	8.33	4.70	3.16
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	84	49.41	2.89	2.38	11.68	8.33	39.66	35.71	45.75	53.57	14.61	50.00	45.45	10.47	16.89
Limited Review:															
Elgin, IL MD 2014-2015	21	12.35	0.56	0.00	19.07	0.00	45.30	47.62	35.06	52.38	10.47	0.00	50.00	3.92	18.75
Lake County–Kenosha County, IL–WI MD	44	25.88	2.75	0.00	15.49	11.36	50.58	84.09	31.18	4.55	19.77	0.00	33.33	21.21	6.25

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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-Naperville-Arlington Heights, IL MD 2012-2013	7,191	33.13	22.65	7.12	16.83	18.41	19.43	20.16	41.09	54.31	1.51	0.95	1.12	1.34	1.88
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	11,528	53.11	22.78	7.52	16.66	20.20	19.30	20.48	41.26	51.81	1.91	1.87	1.72	1.56	2.22
Limited Review:															
Elgin, IL MD 2014-2015	1,149	5.29	19.51	7.20	18.20	18.64	21.03	19.92	41.27	54.24	1.59	0.50	1.11	1.45	2.29
Lake County–Kenosha County, IL–WI MD	1,839	8.47	20.64	9.03	17.65	15.27	21.63	17.93	40.08	57.77	1.52	0.99	1.16	1.49	1.92

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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-Naperville-Arlington Heights, IL MD 2012-2013	587	40.18	22.65	12.16	16.83	15.10	19.43	23.92	41.09	48.82	7.26	7.46	6.35	7.14	7.62
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	730	49.97	22.78	11.13	16.66	20.77	19.30	27.15	41.26	40.95	7.71	12.34	9.98	8.27	5.92
Limited Review:															
Elgin, IL MD 2014-2015	27	1.85	19.51	17.39	18.20	17.39	21.03	17.39	41.27	47.83	3.60	4.35	4.44	6.06	2.51
Lake County–Kenosha County, IL–WI MD	117	8.01	20.64	14.71	17.65	20.59	21.63	31.37	40.08	33.33	4.41	3.80	7.29	6.52	2.90

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: CHICAGO MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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-Naperville-Arlington Heights, IL MD 2012-2013	19,610	69.02	22.65	5.09	16.83	11.95	19.43	22.26	41.09	60.70	3.12	2.75	2.98	2.88	3.31
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	5,251	18.48	22.78	6.97	16.66	14.87	19.30	21.63	41.26	56.53	3.23	3.70	3.34	3.14	3.18
Limited Review:															
Elgin, IL MD 2014-2015	489	1.72	19.51	5.33	18.20	14.47	21.03	22.34	41.27	57.87	3.83	1.53	3.26	3.64	4.27
Lake County–Kenosha County, IL–WI MD	3,061	10.77	20.64	7.33	17.65	12.65	21.63	21.99	40.08	58.02	2.56	2.98	2.86	2.73	2.38

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: CHICAGO MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	18,141	36.29	71.02	57.57	96.27	1.70	2.03	7.99	10.82
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	24,494	48.99	75.21	58.95	95.59	2.14	2.27	8.75	11.58
Limited Review:									
Elgin, IL MD 2014-2015	1,918	3.84	75.48	61.68	97.50	1.30	1.20	10.18	14.21
Lake County–Kenosha County, IL–WI MD	5,441	10.88	78.64	56.72	95.99	2.00	2.00	7.74	9.34

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: CHICAGO MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	21	12.35	95.36	76.19	95.24	0.00	4.76	4.18	6.51
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	84	49.41	94.42	63.10	97.62	2.38	0.00	14.61	22.29
Limited Review:									
Elgin, IL MD 2014-2015	21	12.35	93.13	57.14	95.24	4.76	0.00	10.47	11.36
Lake County–Kenosha County, IL–WI MD	44	25.88	93.05	68.18	95.45	0.00	4.55	19.77	37.14

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: CHICAGO MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	204	77,872	454	92,839	658	170,711	48.53	11	61,655
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	41	29,833	444	133,917	485	163,750	46.55	7	858
Limited Review:									
Elgin, IL MD 2014-2015	1	116	4	16	5	132	0.04	0	0
Lake County–Kenosha County, IL–WI MD	23	15,552	58	1,602	81	17,154	4.88	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CHICAGO MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	47.58	73	NA	6.85	15.07	32.88	45.21	4	9	0	-3	-3	1	9.14	23.77	33.53	33.56
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	45.83	152	90.48	6.58	14.47	40.79	38.16	4	3	-1	0	0	2	9.64	22.55	33.95	33.86
Limited Review:																	
Elgin, IL MD 2014-2015	1.75	4	2.38	0.00	0.00	100.00	0.00	0	1	-1	0	0	0	0.97	36.91	30.30	31.74
Lake County–Kenosha County, IL–WI MD	4.84	12	7.14	0.00	33.33	41.67	25.00	1	0	0	0	1	0	6.79	22.39	39.04	31.27

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: CHICAGO MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Chicago-Naperville-Arlington Heights, IL MD 2012-2013	47.58	73	NA	6.85	15.07	32.88	45.21	142	NA	14.79	14.08	23.94	47.18	9.14	23.77	33.53	33.56
Chicago-Naperville-Arlington Heights, IL MD 2014-2015	45.83	152	90.48	6.58	14.47	40.79	38.16	215	91.49	6.98	14.88	35.81	42.33	9.64	22.55	33.95	33.86
Limited Review:																	
Elgin, IL MD 2014-2015	1.75	4	2.38	0.00	0.00	100.00	0.00	5	2.13	0.00	0.00	80.00	20.00	0.97	36.91	30.30	31.74
Lake County–Kenosha County, IL–WI MD	4.84	12	7.14	0.00	33.33	41.67	25.00	15	6.38	0.00	26.67	53.33	20.00	6.79	22.39	39.04	31.27

Table 1. Lending Volume

LENDING VOLUME												
Geography: CINCINNATI MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cincinnati, OH-KY-IN MSA 2012-2013	53.01	10,761	1,524,469	11,868	388,501	121	5,589	37	144,670	22,787	2,063,229	50.00
Cincinnati, OH-KY-IN MSA 2014-2015	46.99	6,518	876,617	13,435	389,847	225	4,645	25	73,160	20,203	1,344,269	50.00

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: CINCINNATI MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	3,262	51.18	3.06	1.62	16.51	15.79	47.74	48.80	32.70	33.78	5.01	4.00	6.51	5.40	4.09
Cincinnati, OH-KY-IN MSA 2014-2015	3,111	48.82	2.81	1.86	16.53	16.17	46.62	50.34	34.04	31.63	5.17	5.54	5.91	5.81	4.11

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: CINCINNATI MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	487	51.05	3.06	4.31	16.51	17.45	47.74	44.97	32.70	33.26	10.54	17.24	11.42	10.18	10.23
Cincinnati, OH-KY-IN MSA 2014-2015	467	48.95	2.81	0.64	16.53	16.49	46.62	47.11	34.04	35.76	8.57	2.00	9.58	8.69	8.33

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: CINCINNATI MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	6,925	70.67	3.06	1.42	16.51	13.33	47.74	46.47	32.70	38.79	6.14	5.74	7.14	6.41	5.55
Cincinnati, OH-KY-IN MSA 2014-2015	2,874	29.33	2.81	1.39	16.53	16.28	46.62	47.84	34.04	34.48	5.78	4.31	7.21	6.21	4.97

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: CINCINNATI MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	85	56.29	15.75	10.59	28.05	43.53	39.03	36.47	17.17	9.41	16.23	22.22	16.19	18.68	7.14
Cincinnati, OH-KY-IN MSA 2014-2015	66	43.71	14.63	12.12	29.11	53.03	38.78	25.76	17.49	9.09	12.95	10.53	17.17	11.65	7.89

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: CINCINNATI MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati, OH-KY-IN MSA 2012-2013	11,868	46.91	5.80	5.40	20.88	20.32	41.09	40.19	32.17	34.09	19.67	16.87	20.11	20.69	18.68
Cincinnati, OH-KY-IN MSA 2014-2015	13,434	53.09	5.39	4.62	21.16	19.61	39.99	41.06	33.40	34.71	20.25	18.71	20.61	21.80	18.67

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: CINCINNATI MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cincinnati, OH-KY-IN MSA 2012-2013	121	34.97	1.83	0.83	15.89	57.02	57.50	34.71	24.75	7.44	22.46	50.00	52.11	11.66	12.82
Cincinnati, OH-KY-IN MSA 2014-2015	225	65.03	1.81	0.44	15.01	34.22	55.84	44.00	27.33	21.33	37.46	75.00	55.71	27.33	41.67

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: CINCINNATI MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	3,262	51.18	20.81	16.63	17.22	25.26	21.15	20.62	40.81	37.49	2.26	2.74	2.23	1.95	2.32
Cincinnati, OH-KY-IN MSA 2014-2015	3,111	48.82	20.59	13.31	17.10	28.02	21.11	24.32	41.20	34.35	2.19	2.06	2.69	2.24	1.86

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: CINCINNATI MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	487	51.05	20.81	14.41	17.22	22.88	21.15	23.52	40.81	39.19	10.53	11.57	10.26	9.81	10.80
Cincinnati, OH-KY-IN MSA 2014-2015	467	48.95	20.59	10.09	17.10	21.30	21.11	25.78	41.20	42.83	8.49	8.31	9.07	8.68	8.17

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Institution ID: USBNA

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: CINCINNATI MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cincinnati, OH-KY-IN MSA 2012-2013	6,927	70.68	20.81	10.54	17.22	22.26	21.15	25.93	40.81	41.28	6.38	8.31	7.72	6.71	5.33
Cincinnati, OH-KY-IN MSA 2014-2015	2,874	29.32	20.59	10.45	17.10	21.73	21.11	28.17	41.20	39.65	6.18	6.85	6.98	6.69	5.48

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: CINCINNATI MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cincinnati, OH-KY-IN MSA 2012-2013	11,868	46.90	70.14	60.33	94.59	2.11	3.30	19.67	25.97
Cincinnati, OH-KY-IN MSA 2014-2015	13,435	53.10	76.92	58.40	95.09	2.25	2.66	20.25	23.52

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: CINCINNATI MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cincinnati, OH-KY-IN MSA 2012-2013	121	34.97	98.04	79.34	87.60	9.92	2.48	22.46	30.36
Cincinnati, OH-KY-IN MSA 2014-2015	225	65.03	97.69	68.44	97.33	1.78	0.89	37.46	52.23

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: CINCINNATI MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cincinnati, OH-KY-IN MSA 2012-2013	281	86,352	390	113,752	671	200,104	54.97	6	11,286
Cincinnati, OH-KY-IN MSA 2014-2015	167	63,783	346	100,121	513	163,904	45.03	5	8,800

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: CINCINNATI MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Cincinnati, OH-KY-IN MSA 2012-2013	50.00	119	NA	6.72	25.21	40.34	27.73	1	3	0	-1	0	-1	6.87	19.74	43.98	28.84
Cincinnati, OH-KY-IN MSA 2014-2015	50.00	118	100.00	7.63	22.88	39.83	29.66	2	3	0	-1	-1	1	6.40	19.96	43.18	29.89

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: CINCINNATI MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cincinnati, OH-KY-IN MSA 2012-2013	50.00	119	NA	6.72	25.21	40.34	27.73	159	NA	11.32	25.79	40.88	22.01	6.87	19.74	43.98	28.84
Cincinnati, OH-KY-IN MSA 2014-2015	50.00	118	100.00	7.63	22.88	39.83	29.66	149	100.00	8.05	26.85	40.27	24.83	6.40	19.96	43.18	29.89

Table 1. Lending Volume

LENDING VOLUME												
Geography: KANSAS CITY MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Kansas City, MO-KS MSA 2012-2013	62.05	13,555	2,417,904	8,341	239,465	86	9,476	17	32,528	21,999	2,699,373	50.00
Kansas City, MO-KS MSA 2014-2015	37.95	5,128	887,680	8,129	193,876	181	10,383	17	61,712	13,455	1,153,651	50.00

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: KANSAS CITY MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Kansas City, MO-KS MSA 2012-2013	4,668	63.41	5.39	1.31	18.66	14.87	39.29	36.78	36.67	47.04	4.98	4.84	6.81	4.84	4.65
Kansas City, MO-KS MSA 2014-2015	2,694	36.59	5.25	1.15	18.79	15.03	39.02	39.79	36.94	44.02	4.07	3.12	4.69	4.30	3.74

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: KANSAS CITY MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Kansas City, MO-KS MSA 2012-2013	351	47.05	5.39	3.13	18.66	14.25	39.29	34.47	36.67	48.15	8.52	9.43	9.70	8.64	8.10
Kansas City, MO-KS MSA 2014-2015	395	52.95	5.25	2.28	18.79	16.20	39.02	35.95	36.94	45.57	7.94	7.14	9.47	7.83	7.61

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: KANSAS CITY MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Kansas City, MO-KS MSA 2012-2013	8,507	80.85	5.39	1.03	18.66	8.69	39.29	31.32	36.67	58.96	6.03	4.14	5.15	5.58	6.70
Kansas City, MO-KS MSA 2014-2015	2,015	19.15	5.25	1.54	18.79	12.51	39.02	37.02	36.94	48.93	4.33	3.50	3.88	4.41	4.41

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: KANSAS CITY MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Kansas City, MO-KS MSA 2012-2013	24	53.33	15.86	20.83	30.74	16.67	29.86	58.33	23.54	4.17	5.06	9.68	0.00	8.96	0.00
Kansas City, MO-KS MSA 2014-2015	21	46.67	15.32	38.10	31.28	33.33	29.53	23.81	23.86	4.76	5.45	9.09	2.70	6.78	3.13

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: KANSAS CITY MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Kansas City, MO-KS MSA 2012-2013	8,125	50.30	6.88	5.87	18.98	20.41	33.32	34.25	39.28	39.47	16.28	17.37	17.12	17.91	14.42
Kansas City, MO-KS MSA 2014-2015	8,028	49.70	6.61	5.00	19.22	19.84	32.83	32.61	39.65	42.55	13.73	12.44	15.45	14.38	12.90

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: KANSAS CITY MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Kansas City, MO-KS MSA 2012-2013	86	32.21	2.45	1.16	16.70	26.74	48.07	62.79	32.50	9.30	7.72	20.00	7.02	8.76	4.30
Kansas City, MO-KS MSA 2014-2015	181	67.79	2.59	0.00	17.17	21.55	47.07	58.01	32.88	20.44	12.86	0.00	14.66	14.12	8.20

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: KANSAS CITY MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Kansas City, MO-KS MSA 2012-2013	4,670	63.40	20.38	10.60	17.66	22.74	21.47	27.03	40.48	39.63	2.36	2.08	1.97	2.43	2.63
Kansas City, MO-KS MSA 2014-2015	2,696	36.60	20.20	10.92	17.53	21.26	21.42	25.81	40.86	42.02	2.02	1.94	1.81	2.01	2.19

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: KANSAS CITY MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Kansas City, MO-KS MSA 2012-2013	351	47.05	20.38	11.89	17.66	20.63	21.47	28.32	40.48	39.16	6.90	11.38	8.06	8.44	5.01
Kansas City, MO-KS MSA 2014-2015	395	52.95	20.20	9.35	17.53	19.55	21.42	27.20	40.86	43.91	8.20	9.57	10.70	8.84	6.69

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: KANSAS CITY MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Kansas City, MO-KS MSA 2012-2013	8,510	80.85	20.38	8.63	17.66	18.11	21.47	24.38	40.48	48.87	4.19	5.07	4.33	3.91	4.13
Kansas City, MO-KS MSA 2014-2015	2,016	19.15	20.20	11.59	17.53	17.73	21.42	26.06	40.86	44.62	3.78	5.04	3.20	3.95	3.68

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: KANSAS CITY MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Kansas City, MO-KS MSA 2012-2013	8,341	50.64	70.68	54.59	95.19	1.97	2.84	16.28	20.14
Kansas City, MO-KS MSA 2014-2015	8,129	49.36	77.71	54.42	96.16	1.77	2.07	13.73	16.06

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: KANSAS CITY MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Kansas City, MO-KS MSA 2012-2013	86	32.21	97.26	67.44	67.44	18.60	13.95	7.72	8.72
Kansas City, MO-KS MSA 2014-2015	181	67.79	96.44	63.54	86.19	4.97	8.84	12.86	14.64

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: KANSAS CITY MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Kansas City, MO-KS MSA 2012-2013	219	148,697	237	34,361	456	183,058	62.74	19	34,662
Kansas City, MO-KS MSA 2014-2015	39	28,245	179	80,469	218	108,714	37.26	4	3,650

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

** 'Unfunded Commitments' are 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: KANSAS CITY MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Kansas City, MO-KS MSA 2012-2013	50.00	57	NA	7.02	14.04	43.86	35.09	0	0	0	0	0	0	8.45	21.87	36.92	32.75
Kansas City, MO-KS MSA 2014-2015	50.00	59	100.00	6.78	15.25	42.37	33.90	3	1	0	1	1	0	8.26	22.06	36.67	33.00

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: KANSAS CITY MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Kansas City, MO-KS MSA 2012-2013	50.00	57	NA	7.02	14.04	43.86	35.09	107	NA	5.61	24.30	39.25	24.30	8.45	21.87	36.92	32.75
Kansas City, MO-KS MSA 2014-2015	50.00	59	100.00	6.78	15.25	42.37	33.90	75	100.00	8.00	12.00	38.67	32.00	8.26	22.06	36.67	33.00

Table 1. Lending Volume

LENDING VOLUME												
Geography: LOUISVILLE MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Louisville/Jefferson County, KY-IN MSA 2012-2013	55.26	2,986	413,217	1,812	71,445	10	160	7	68,932	4,815	553,754	50.00
Louisville/Jefferson County, KY-IN MSA 2014-2015	44.74	1,523	216,904	2,349	61,679	24	177	2	28,148	3,898	306,908	50.00

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	971	53.15	4.96	1.85	15.14	15.96	44.47	43.46	35.43	38.72	2.33	2.52	3.48	2.36	1.95
Louisville/Jefferson County, KY-IN MSA 2014-2015	856	46.85	5.17	1.64	14.92	16.82	44.47	54.21	35.43	27.34	2.87	2.11	3.48	3.48	2.04

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	135	57.94	4.96	4.44	15.14	14.81	44.47	46.67	35.43	34.07	4.84	4.84	5.88	4.79	4.51
Louisville/Jefferson County, KY-IN MSA 2014-2015	98	42.06	5.17	3.06	14.92	12.24	44.47	45.92	35.43	38.78	4.30	2.82	3.86	4.49	4.43

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	1,872	76.88	4.96	2.03	15.14	9.88	44.47	40.92	35.43	47.17	3.07	2.77	3.03	2.98	3.20
Louisville/Jefferson County, KY-IN MSA 2014-2015	563	23.12	5.17	2.13	14.92	11.90	44.47	41.03	35.43	44.94	2.65	1.64	2.80	2.46	2.87

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	8	57.14	19.40	12.50	23.62	37.50	35.47	25.00	21.52	25.00	1.12	0.00	0.00	2.94	0.00
Louisville/Jefferson County, KY-IN MSA 2014-2015	6	42.86	19.63	16.67	23.39	50.00	35.47	16.67	21.52	16.67	3.45	4.55	4.55	1.67	5.26

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: LOUISVILLE MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	1,809	43.55	10.88	8.79	16.74	19.40	33.44	32.56	38.63	39.25	7.35	5.83	8.51	7.64	7.02
Louisville/Jefferson County, KY-IN MSA 2014-2015	2,345	56.45	11.54	7.38	16.86	16.55	32.84	37.44	38.46	38.64	7.59	5.37	7.90	8.86	7.05

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: LOUISVILLE MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	10	29.41	4.02	0.00	11.79	10.00	39.69	50.00	44.35	40.00	5.08	0.00	0.00	7.14	4.23
Louisville/Jefferson County, KY-IN MSA 2014-2015	24	70.59	3.83	16.67	11.54	0.00	39.27	20.83	45.27	62.50	14.00	0.00	0.00	6.06	18.75

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	971	53.15	21.69	35.88	17.77	23.78	20.57	15.56	39.97	24.78	1.98	5.99	1.82	1.14	1.37
Louisville/Jefferson County, KY-IN MSA 2014-2015	856	46.85	21.79	43.93	17.83	23.28	20.65	12.35	39.73	20.45	1.67	5.59	1.40	0.92	0.95

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Institution ID: USBNA

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	135	57.94	21.69	10.83	17.77	26.67	20.57	27.50	39.97	35.00	4.49	3.77	6.59	4.30	3.89
Louisville/Jefferson County, KY-IN MSA 2014-2015	98	42.06	21.79	12.63	17.83	22.11	20.65	27.37	39.73	37.89	4.42	5.14	3.82	5.40	4.00

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: LOUISVILLE MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Louisville/Jefferson County, KY-IN MSA 2012-2013	1,872	76.88	21.69	10.74	17.77	21.42	20.57	24.92	39.97	42.91	3.16	3.89	3.21	3.13	3.02
Louisville/Jefferson County, KY-IN MSA 2014-2015	563	23.12	21.79	12.04	17.83	24.29	20.65	22.65	39.73	41.02	2.95	2.82	3.38	2.60	2.96

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: LOUISVILLE MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Louisville/Jefferson County, KY-IN MSA 2012-2013	1,812	43.55	71.57	62.25	92.55	3.04	4.42	7.35	9.80
Louisville/Jefferson County, KY-IN MSA 2014-2015	2,349	56.45	76.74	62.96	95.36	2.47	2.17	7.59	10.13

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: LOUISVILLE MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Louisville/Jefferson County, KY-IN MSA 2012-2013	10	29.41	98.10	80.00	90.00	10.00	0.00	5.08	10.81
Louisville/Jefferson County, KY-IN MSA 2014-2015	24	70.59	97.75	70.83	100.00	0.00	0.00	14.00	40.74

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: LOUISVILLE MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Louisville/Jefferson County, KY-IN MSA 2012-2013	50	19,342	63	17,766	113	37,108	78.84	6	10,365
Louisville/Jefferson County, KY-IN MSA 2014-2015	20	7,802	51	2,157	71	9,959	21.16	2	10,315

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

Institution ID: USBNA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: LOUISVILLE MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Louisville/Jefferson County, KY-IN MSA 2012-2013	50.00	27	NA	11.11	18.52	40.74	29.63	0	1	0	0	0	-1	9.96	18.39	41.25	30.39
Louisville/Jefferson County, KY-IN MSA 2014-2015	50.00	27	100.00	14.81	14.81	40.74	29.63	0	0	0	0	0	0	10.20	18.15	41.25	30.39

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: LOUISVILLE MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Louisville/Jefferson County, KY-IN MSA 2012-2013	50.00	27	NA	11.11	18.52	40.74	29.63	36	NA	19.44	22.22	30.56	27.78	9.96	18.39	41.25	30.39
Louisville/Jefferson County, KY-IN MSA 2014-2015	50.00	27	100.00	14.81	14.81	40.74	29.63	32	100.00	12.50	21.88	34.38	31.25	10.20	18.15	41.25	30.39

Table 1. Lending Volume

LENDING VOLUME												
Geography: MINNEAPOLIS MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	54.87	45,749	8,858,604	36,925	884,707	75	2,256	49	302,736	82,798	10,048,303	49.99
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	45.13	27,477	5,589,377	40,176	794,990	395	3,967	46	284,108	68,094	6,672,442	50.01

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	15,219	47.02	2.59	2.94	14.63	16.56	53.07	49.40	29.70	31.10	10.98	13.51	12.93	10.57	10.58
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	17,149	52.98	2.49	3.63	13.43	16.55	51.77	50.36	32.32	29.46	11.40	14.94	14.65	11.16	10.11

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	1340	51.86	2.59	2.09	14.63	8.96	53.07	48.51	29.70	40.45	14.29	16.22	10.09	13.78	16.55
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	1244	48.14	2.49	1.93	13.43	10.93	51.77	52.65	32.32	34.49	11.11	10.06	10.39	11.00	11.64

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: MINNEAPOLIS MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	29,134	76.29	2.59	1.63	14.63	10.30	53.07	48.52	29.70	39.55	11.49	10.49	11.00	10.94	12.50
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	9,053	23.71	2.49	1.79	13.43	10.42	51.77	49.12	32.32	38.67	8.82	7.94	8.18	8.52	9.45

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	56	64.37	14.04	21.43	30.63	23.21	39.85	44.64	15.48	10.71	6.24	6.12	5.43	7.69	4.41
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	31	35.63	13.85	9.68	27.24	48.39	41.87	32.26	17.04	9.68	2.91	3.13	2.79	2.75	3.26

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: MINNEAPOLIS MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Buis-nesses***	% BANK Loans	% of Buis-nesses***	% BANK Loans	% of Buis-nesses***	% BANK Loans	% of Buis-nesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	36,925	47.89	4.74	3.78	16.58	16.31	48.00	46.44	30.67	33.47	30.46	32.52	32.40	30.34	29.70
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	40,174	52.11	4.52	3.39	14.94	13.31	47.23	44.77	33.30	38.53	27.89	25.98	26.57	27.38	29.05

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	75	15.96	1.11	0.00	11.58	14.67	63.94	58.67	23.37	26.67	7.42	0.00	11.84	5.83	10.17
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	395	84.04	1.13	1.77	10.55	9.87	60.80	53.67	27.52	34.68	20.95	50.00	22.06	16.49	32.12

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	15,219	47.02	19.48	14.12	18.03	24.54	23.70	21.86	38.79	39.48	4.22	3.56	3.67	3.84	5.19
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	17,149	52.98	19.03	11.47	17.65	24.82	23.34	23.34	39.99	40.36	3.85	3.57	3.45	3.44	4.62

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	1340	51.86	19.48	9.92	18.03	23.18	23.70	25.06	38.79	41.83	12.97	12.45	12.90	12.03	13.75
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	1244	48.14	19.03	9.38	17.65	23.96	23.34	24.88	39.99	41.78	10.45	10.92	11.31	10.56	9.83

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	29,134	76.29	19.48	9.80	18.03	20.14	23.70	26.26	38.79	43.80	10.34	10.70	9.54	10.28	10.69
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	9,053	23.71	19.03	9.43	17.65	20.12	23.34	26.61	39.99	43.84	8.31	8.25	7.81	8.28	8.59

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: MINNEAPOLIS MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	36,925	47.89	73.89	49.30	96.66	1.15	2.19	30.46	29.59
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	40,176	52.11	80.27	48.78	97.35	1.01	1.65	27.89	26.72

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	75	15.96	97.46	80.00	94.67	4.00	1.33	7.42	10.70
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	395	84.04	96.81	53.16	98.73	1.01	0.25	20.95	24.01

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: MINNEAPOLIS MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	480	205,778	486	186,496	966	392,274	52.24	13	25,227
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	122	80,165	373	278,505	495	358,670	47.76	5	4,822

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

** 'Unfunded Commitments' are 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: MINNEAPOLIS MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	49.99	96	NA	8.33	26.04	44.79	20.83	3	1	1	-1	2	0	6.45	17.79	49.02	26.63
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	50.01	99	100.00	6.06	24.24	47.47	22.22	4	2	-1	0	3	0	6.26	16.38	48.31	28.93

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: MINNEAPOLIS MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2012-2013	49.99	96	NA	8.33	26.04	44.79	20.83	444	NA	9.46	22.52	44.14	23.65	6.45	17.79	49.02	26.63
Minneapolis-St. Paul-Bloomington, MN-WI MSA 2014-2015	50.01	99	100.00	6.06	24.24	47.47	22.22	441	100.00	9.52	20.18	44.22	25.85	6.26	16.38	48.31	28.93

Table 1. Lending Volume

LENDING VOLUME												
Geography: ST. LOUIS MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
St. Louis, MO-IL MSA 2012-2013	60.53	26,284	4,441,349	16,482	362,027	167	17,291	31	240,726	42,964	5,061,393	50.05
St. Louis, MO-IL MSA 2014-2015	39.47	9,767	1,519,359	17,881	327,904	337	18,041	28	144,665	28,013	2,009,969	49.95

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
St. Louis, MO-IL MSA 2012-2013	6,725	59.83	4.49	1.83	17.23	12.74	45.11	46.84	33.17	38.59	5.97	5.37	7.23	6.09	5.53
St. Louis, MO-IL MSA 2014-2015	4,515	40.17	4.36	0.91	16.09	13.36	45.84	48.24	33.70	37.50	4.23	2.09	5.24	4.24	4.04

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
St. Louis, MO-IL MSA 2012-2013	770	50.89	4.49	2.73	17.23	11.82	45.11	44.03	33.17	41.43	11.21	11.76	8.83	10.18	13.74
St. Louis, MO-IL MSA 2014-2015	743	49.11	4.36	2.29	16.09	12.92	45.84	43.20	33.70	41.59	10.14	6.47	9.24	9.84	11.22

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: ST. LOUIS MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
St. Louis, MO-IL MSA 2012-2013	18,743	80.66	4.49	1.15	17.23	7.93	45.11	37.96	33.17	52.96	7.93	8.13	7.18	7.32	8.70
St. Louis, MO-IL MSA 2014-2015	4,493	19.34	4.36	1.54	16.09	10.33	45.84	43.11	33.70	45.03	5.25	4.87	5.30	5.25	5.25

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
St. Louis, MO-IL MSA 2012-2013	46	74.19	13.02	15.22	19.66	30.43	39.03	41.30	28.29	13.04	7.00	7.69	7.22	6.25	7.79
St. Louis, MO-IL MSA 2014-2015	16	25.81	12.84	31.25	19.34	43.75	39.50	18.75	28.31	6.25	3.76	7.69	5.71	2.11	1.37

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: ST. LOUIS MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
St. Louis, MO-IL MSA 2012-2013	16,482	47.98	5.63	4.43	16.60	15.43	39.32	38.08	38.37	42.05	20.52	19.42	21.14	20.49	20.18
St. Louis, MO-IL MSA 2014-2015	17,870	52.02	5.50	4.07	15.74	13.93	39.97	39.42	38.69	42.58	18.82	17.04	17.95	19.31	18.76

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: ST. LOUIS MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
St. Louis, MO-IL MSA 2012-2013	167	33.13	1.45	0.00	12.73	9.58	54.58	55.69	31.20	34.73	8.39	0.00	6.72	7.36	12.76
St. Louis, MO-IL MSA 2014-2015	337	66.87	1.31	0.30	11.63	10.39	55.14	52.52	31.87	36.80	13.33	0.00	17.65	10.26	20.22

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
St. Louis, MO-IL MSA 2012-2013	6,725	59.83	21.17	17.25	17.20	25.48	21.17	20.76	40.46	36.51	3.55	4.07	3.56	3.12	3.63
St. Louis, MO-IL MSA 2014-2015	4,515	40.17	20.94	13.87	17.07	23.12	21.16	23.12	40.83	39.89	2.87	2.76	2.68	2.87	3.03

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
St. Louis, MO-IL MSA 2012-2013	770	50.89	21.17	13.50	17.20	23.51	21.17	22.93	40.46	40.06	10.75	10.46	12.57	11.02	9.89
St. Louis, MO-IL MSA 2014-2015	743	49.11	20.94	11.16	17.07	20.12	21.16	25.40	40.83	43.32	10.57	8.55	12.11	12.56	9.44

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
St. Louis, MO-IL MSA 2012-2013	18,743	80.66	21.17	9.33	17.20	19.36	21.17	25.01	40.46	46.31	6.70	7.04	7.30	6.62	6.43
St. Louis, MO-IL MSA 2014-2015	4,493	19.34	20.94	10.40	17.07	21.01	21.16	24.94	40.83	43.66	5.10	6.01	5.76	4.97	4.76

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: ST. LOUIS MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
St. Louis, MO-IL MSA 2012-2013	16,482	47.96	70.47	57.97	96.51	1.80	1.69	20.52	25.70
St. Louis, MO-IL MSA 2014-2015	17,881	52.04	77.22	58.02	97.27	1.46	1.28	18.82	23.35

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: ST. LOUIS MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
St. Louis, MO-IL MSA 2012-2013	167	33.13	98.01	79.04	67.07	20.96	11.98	8.39	9.47
St. Louis, MO-IL MSA 2014-2015	337	66.87	97.18	65.88	83.09	11.57	5.34	13.33	15.61

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: ST. LOUIS MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
St. Louis, MO-IL MSA 2012-2013	313	311,491	437	155,894	750	467,385	61.83	39	37,943
St. Louis, MO-IL MSA 2014-2015	82	86,684	322	201,814	404	288,498	38.17	15	32,266

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

** 'Unfunded Commitments' are 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: ST. LOUIS MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
St. Louis, MO-IL MSA 2012-2013	50.05	117	NA	7.69	13.68	41.88	36.75	1	2	-1	-1	1	0	7.82	18.96	42.69	30.50
St. Louis, MO-IL MSA 2014-2015	49.95	117	100.00	7.69	12.82	42.74	36.75	2	1	0	0	1	0	7.71	17.89	43.39	30.97

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: ST. LOUIS MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
St. Louis, MO-IL MSA 2012-2013	50.05	117	NA	7.69	13.68	41.88	36.75	333	NA	10.21	20.12	40.84	28.83	7.82	18.96	42.69	30.50
St. Louis, MO-IL MSA 2014-2015	49.95	117	100.00	7.69	12.82	42.74	36.75	309	100.00	11.00	21.68	36.89	30.42	7.71	17.89	43.39	30.97

Table 1. Lending Volume

LENDING VOLUME												
Geography: OTHER MULTISTATE MA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Clarksville, TN–KY MSA	100.00	1,840	261,275	1,666	35,914	151	16,911	5	7,165	3,662	321,265	100.00
Davenport–Moline–Rock Island, IA–IL MSA	100.00	5,481	709,267	3,650	142,058	115	11,260	18	31,655	9,264	894,240	100.00
Fargo, ND–MN MSA	100.00	5,012	871,412	5,261	86,541	104	2,078	8	116,250	10,385	1,076,281	100.00
Grand Forks, ND–MN MSA	100.00	1,266	184,942	1,864	38,384	165	10,649	3	4,725	3,298	238,700	100.00
Lewiston, ID-WA MSA	100.00	844	123,075	1,085	37,720	85	10,241	5	1,820	2,019	172,856	100.00
Logan, UT-ID MSA	100.00	1,706	303,015	444	14,300	42	3,898	2	1,231	2,194	322,444	100.00
Omaha-Council Bluffs, NE–IA MSA	100.00	13,874	1,925,797	8,158	249,179	354	36,299	14	82,706	22,400	2,293,981	100.00
Portland–Vancouver-Hillsboro, OR–WA MSA	100.00	20,837	4,615,003	41,769	1,121,606	669	10,505	75	300,493	63,350	6,047,607	100.00

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Institution ID: USBNA

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Clarksville, TN–KY MSA	696	100.00	1.35	0.57	11.81	4.02	60.67	63.07	26.17	32.33	2.75	0.00	1.85	2.98	2.38
Davenport–Moline–Rock Island, IA–IL MSA	2,612	100.00	2.44	1.00	14.82	12.94	57.19	58.38	25.56	27.68	7.70	6.58	11.47	8.29	5.50
Fargo, ND–MN MSA	2,914	100.00	0.69	0.62	9.77	6.52	62.54	54.02	26.99	38.85	15.67	11.76	14.87	16.94	14.26
Grand Forks, ND–MN MSA	570	100.00	0.49	0.35	17.23	13.33	67.34	66.84	14.94	19.47	8.16	0.00	6.39	8.57	8.33
Lewiston, ID–WA MSA	201	100.00	0.00	0.00	19.15	18.41	70.05	71.64	10.80	9.95	2.37	0.00	3.81	2.16	0.82
Logan, UT-ID MSA	661	100.00	0.00	0.30	14.51	20.57	65.45	54.01	20.04	25.11	6.11	0.00	5.57	5.49	9.09
Omaha–Council Bluffs, NE–IA MSA	6,901	100.00	5.51	3.71	17.02	17.98	43.99	47.11	33.47	31.20	8.86	12.59	12.63	10.09	6.18
Portland–Vancouver–Hillsboro, OR–WA MSA	6,895	100.00	1.26	1.51	18.34	18.42	50.29	47.74	30.11	32.33	5.08	6.43	5.71	4.88	4.96

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Clarksville, TN–KY MSA	97	100.00	1.35	0.00	11.81	4.12	60.67	62.89	26.17	32.99	4.48	0.00	2.94	3.57	7.89
Davenport–Moline–Rock Island, IA–IL MSA	292	100.00	2.44	1.03	14.82	11.64	57.19	53.42	25.56	33.90	4.77	0.00	2.89	4.22	7.71
Fargo, ND–MN MSA	130	100.00	0.69	0.00	9.77	9.23	62.54	60.00	26.99	30.77	5.97	0.00	5.17	6.04	6.22
Grand Forks, ND–MN MSA	95	100.00	0.49	0.00	17.23	15.79	67.34	60.00	14.94	24.21	9.59	0.00	5.41	8.97	16.22
Lewiston, ID–WA MSA	69	100.00	0.00	0.00	19.15	17.39	70.05	68.12	10.80	14.49	12.99	0.00	9.09	10.34	37.50
Logan, UT–ID MSA	28	100.00	0.00	0.00	14.51	14.29	65.45	75.00	20.04	10.71	4.44	0.00	5.56	4.04	5.56
Omaha–Council Bluffs, NE–IA MSA	549	100.00	5.51	3.28	17.02	19.49	43.99	45.72	33.47	31.51	4.86	5.83	3.89	5.53	4.41
Portland–Vancouver–Hillsboro, OR–WA MSA	1,088	100.00	1.26	0.92	18.34	17.74	50.29	52.48	30.11	28.86	6.80	3.85	5.73	7.68	6.20

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: OTHER MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Clarksville, TN–KY MSA	1,035	100.00	1.35	0.19	11.81	6.18	60.67	62.42	26.17	31.21	4.85	0.00	5.53	4.70	5.15
Davenport–Moline–Rock Island, IA–IL MSA	2,558	100.00	2.44	0.98	14.82	9.03	57.19	47.07	25.56	42.92	5.71	3.51	4.82	5.10	7.06
Fargo, ND–MN MSA	1,954	100.00	0.69	0.41	9.77	6.55	62.54	55.94	26.99	37.10	12.86	11.76	11.90	12.00	14.33
Grand Forks, ND–MN MSA	598	100.00	0.49	0.33	17.23	14.05	67.34	69.57	14.94	16.05	7.51	0.00	7.06	8.29	5.29
Lewiston, ID–WA MSA	573	100.00	0.00	0.00	19.15	16.75	70.05	72.77	10.80	10.47	10.59	0.00	7.05	12.23	7.77
Logan, UT–ID MSA	1,016	100.00	0.00	0.00	14.51	11.71	65.45	64.57	20.04	23.72	8.62	0.00	6.08	8.75	10.13
Omaha–Council Bluffs, NE–IA MSA	6,411	100.00	5.51	2.23	17.02	12.74	43.99	43.16	33.47	41.87	6.32	10.58	7.54	6.67	5.44
Portland–Vancouver–Hillsboro, OR–WA MSA	12,778	100.00	1.26	0.93	18.34	16.57	50.29	47.86	30.11	34.65	4.91	5.98	5.45	4.74	4.85

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Clarksville, TN–KY MSA	12	100.00	2.94	16.67	23.90	8.33	67.15	58.33	6.01	16.67	13.04	0.00	12.50	15.15	0.00
Davenport–Moline–Rock Island, IA–IL MSA	19	100.00	10.83	31.58	20.37	10.53	49.51	42.11	19.29	15.79	9.20	10.00	7.69	7.69	13.33
Fargo, ND–MN MSA	14	100.00	9.15	21.43	22.07	0.00	51.79	57.14	17.00	21.43	5.67	14.29	0.00	8.45	4.17
Grand Forks, ND–MN MSA	3	100.00	4.75	0.00	26.62	66.67	61.24	33.33	7.39	0.00	5.00	0.00	0.00	6.67	0.00
Lewiston, ID–WA MSA	1	100.00	0.00	0.00	38.08	0.00	61.92	100.00	0.00	0.00	16.67	0.00	0.00	25.00	0.00
Logan, UT-ID MSA	1	100.00	13.63	0.00	74.67	0.00	10.65	100.00	1.06	0.00	0.00	0.00	0.00	0.00	0.00
Omaha-Council Bluffs, NE–IA MSA	13	100.00	12.63	7.69	29.58	46.15	41.20	38.46	16.59	7.69	1.88	0.00	2.70	2.44	0.00
Portland–Vancouver–Hillsboro, OR–WA MSA	76	100.00	6.33	9.21	31.02	32.89	43.15	42.11	19.50	15.79	2.03	2.70	1.18	2.85	1.11

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: OTHER MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Clarksville, TN–KY MSA	1,663	100.00	5.97	2.83	19.05	18.82	55.68	58.99	18.54	19.36	22.59	14.44	23.75	24.44	19.42
Davenport–Moline–Rock Island, IA–IL MSA	3,650	100.00	8.84	8.03	14.10	9.21	48.59	43.15	28.47	39.62	22.46	18.90	19.19	21.13	26.26
Fargo, ND–MN MSA	5,261	100.00	3.35	3.57	20.19	22.87	52.06	40.62	24.39	32.94	22.36	23.57	19.52	22.99	21.66
Grand Forks, ND–MN MSA	1,864	100.00	2.29	1.39	19.34	16.20	66.77	66.04	11.60	16.36	25.60	22.22	25.53	22.99	31.12
Lewiston, ID-WA MSA	1,085	100.00	0.00	0.00	37.95	37.97	57.18	57.24	4.87	4.79	25.82	0.00	24.60	26.29	20.63
Logan, UT-ID MSA	444	100.00	1.11	0.45	30.38	28.83	49.78	59.01	18.72	11.71	5.24	0.00	5.42	5.52	3.97
Omaha-Council Bluffs, NE–IA MSA	8,150	100.00	6.80	7.18	17.12	17.28	44.09	46.01	31.54	29.53	15.75	18.09	17.74	16.73	13.23
Portland–Vancouver–Hillsboro, OR–WA MSA	41,697	100.00	4.30	3.83	22.64	22.41	43.83	45.40	29.11	28.36	20.94	20.98	20.96	21.57	19.84

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: OTHER MULTISTATE MA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Clarksville, TN–KY MSA	151	100.00	1.64	0.00	13.01	11.26	57.67	80.13	27.53	8.61	40.57	0.00	38.46	38.03	55.56
Davenport–Moline–Rock Island, IA–IL MSA	115	100.00	0.81	0.00	5.10	0.00	66.42	50.43	27.67	49.57	14.00	0.00	14.29	10.08	21.88
Fargo, ND–MN MSA	104	100.00	0.26	2.88	4.83	5.77	74.71	68.27	20.19	23.08	4.68	0.00	25.00	3.91	5.93
Grand Forks, ND–MN MSA	165	100.00	0.19	0.00	12.04	1.82	81.89	92.73	5.88	5.45	5.52	0.00	0.00	5.73	5.88
Lewiston, ID–WA MSA	85	100.00	0.00	0.00	17.42	11.76	78.40	87.06	4.18	1.18	24.58	0.00	22.73	23.33	25.00
Logan, UT–ID MSA	42	100.00	0.00	0.00	8.61	0.00	79.59	100.00	11.80	0.00	8.93	0.00	0.00	9.71	0.00
Omaha–Council Bluffs, NE–IA MSA	354	100.00	1.65	0.00	6.51	5.65	62.99	82.20	28.81	12.15	18.25	0.00	45.45	20.61	8.87
Portland–Vancouver–Hillsboro, OR–WA MSA	669	100.00	1.76	0.75	14.65	8.97	54.13	62.03	29.41	28.25	35.00	42.86	43.64	32.80	37.65

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Clarksville, TN–KY MSA	696	100.00	20.24	8.08	18.24	27.54	22.08	27.84	39.44	36.53	1.34	4.17	2.36	0.86	1.05
Davenport–Moline–Rock Island, IA–IL MSA	2,612	100.00	20.02	15.08	18.42	26.48	21.80	24.92	39.77	33.52	2.98	2.79	3.23	3.05	2.83
Fargo, ND–MN MSA	2,914	100.00	18.15	8.84	17.92	24.82	24.84	32.24	39.09	34.09	4.14	4.18	3.96	4.80	3.72
Grand Forks, ND–MN MSA	570	100.00	19.55	9.54	18.31	27.92	24.20	27.56	37.94	34.98	5.09	3.85	5.32	5.26	5.11
Lewiston, ID–WA MSA	201	100.00	19.98	8.89	18.23	24.44	22.24	24.44	39.55	42.22	2.27	3.03	0.84	2.14	3.22
Logan, UT–ID MSA	661	100.00	18.78	8.11	19.53	18.92	22.44	24.32	39.25	48.65	0.47	0.00	0.17	0.79	0.53
Omaha–Council Bluffs, NE–IA MSA	6,901	100.00	20.54	14.58	17.35	28.64	22.61	21.68	39.50	35.10	3.20	4.25	3.53	2.75	2.99
Portland–Vancouver–Hillsboro, OR–WA MSA	6,895	100.00	20.51	5.48	17.75	15.46	21.41	20.80	40.33	58.26	1.73	1.84	1.07	1.24	2.27

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Clarksville, TN–KY MSA	97	100.00	20.24	10.53	18.24	21.05	22.08	26.32	39.44	42.11	5.24	2.50	5.56	11.11	4.80
Davenport–Moline–Rock Island, IA–IL MSA	292	100.00	20.02	8.88	18.42	19.31	21.80	33.20	39.77	38.61	4.31	1.00	3.97	6.41	4.25
Fargo, ND–MN MSA	130	100.00	18.15	17.72	17.92	15.19	24.84	29.11	39.09	37.97	3.42	2.33	3.03	3.05	3.90
Grand Forks, ND–MN MSA	95	100.00	19.55	7.23	18.31	26.51	24.20	26.51	37.94	39.76	9.35	5.88	12.96	7.46	9.21
Lewiston, ID–WA MSA	69	100.00	19.98	9.09	18.23	22.73	22.24	31.82	39.55	36.36	13.51	0.00	8.33	16.67	15.63
Logan, UT–ID MSA	28	100.00	18.78	10.00	19.53	20.00	22.44	25.00	39.25	45.00	3.13	0.00	6.67	3.70	2.44
Omaha–Council Bluffs, NE–IA MSA	549	100.00	20.54	11.41	17.35	23.01	22.61	26.27	39.50	39.31	4.77	3.67	5.58	6.07	3.99
Portland–Vancouver–Hillsboro, OR–WA MSA	1,088	100.00	20.51	12.07	17.75	22.75	21.41	23.15	40.33	42.04	6.76	10.18	8.64	5.28	6.48

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Clarksville, TN–KY MSA	1,035	100.00	20.24	8.17	18.24	21.47	22.08	23.68	39.44	46.68	8.37	4.12	13.74	10.20	6.30
Davenport–Moline–Rock Island, IA–IL MSA	2,558	100.00	20.02	9.93	18.42	21.56	21.80	25.46	39.77	43.06	4.86	2.97	5.61	5.12	4.84
Fargo, ND–MN MSA	1,954	100.00	18.15	8.49	17.92	20.61	24.84	26.84	39.09	44.05	6.34	6.29	7.00	5.82	6.35
Grand Forks, ND–MN MSA	598	100.00	19.55	9.73	18.31	22.44	24.20	25.94	37.94	41.90	7.10	4.90	12.50	3.61	7.03
Lewiston, ID–WA MSA	573	100.00	19.98	6.80	18.23	19.85	22.24	26.47	39.55	46.88	12.91	10.91	12.90	11.67	14.23
Logan, UT–ID MSA	1,016	100.00	18.78	4.59	19.53	17.31	22.44	27.56	39.25	50.53	4.29	4.48	3.24	3.46	5.03
Omaha–Council Bluffs, NE–IA MSA	6,411	100.00	20.54	10.91	17.35	24.12	22.61	27.53	39.50	37.44	6.17	10.66	7.88	6.50	4.68
Portland–Vancouver–Hillsboro, OR–WA MSA	12,778	100.00	20.51	8.67	17.75	20.04	21.41	24.87	40.33	46.42	4.60	5.77	5.36	4.35	4.34

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: OTHER MULTISTATE MA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Clarksville, TN–KY MSA	1,666	100.00	75.86	63.99	96.64	1.74	1.62	22.59	28.85
Davenport–Moline–Rock Island, IA–IL MSA	3,650	100.00	75.12	52.63	92.79	3.01	4.19	22.46	27.64
Fargo, ND–MN MSA	5,261	100.00	74.84	38.98	98.14	0.84	1.03	22.36	23.10
Grand Forks, ND–MN MSA	1,864	100.00	74.11	38.41	96.83	1.45	1.72	25.60	25.25
Lewiston, ID-WA MSA	1,085	100.00	76.71	60.55	92.44	4.15	3.41	25.82	28.85
Logan, UT-ID MSA	444	100.00	80.21	59.01	95.50	1.58	2.93	5.24	7.71
Omaha-Council Bluffs, NE–IA MSA	8,158	100.00	76.83	56.47	95.26	2.15	2.60	15.75	19.53
Portland–Vancouver-Hillsboro, OR–WA MSA	41,769	100.00	80.26	56.48	95.93	1.58	2.48	20.94	22.39

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: OTHER MULTISTATE MA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Clarksville, TN–KY MSA	151	100.00	98.36	71.52	66.23	19.87	13.91	40.57	68.75
Davenport–Moline–Rock Island, IA–IL MSA	115	100.00	97.70	73.04	73.91	15.65	10.43	14.00	28.99
Fargo, ND–MN MSA	104	100.00	97.45	39.42	95.19	3.85	0.96	4.68	3.90
Grand Forks, ND–MN MSA	165	100.00	96.83	23.64	81.82	8.48	9.70	5.52	3.99
Lewiston, ID-WA MSA	85	100.00	97.56	77.65	62.35	23.53	14.12	24.58	28.24
Logan, UT-ID MSA	42	100.00	98.25	83.33	76.19	14.29	9.52	8.93	11.27
Omaha-Council Bluffs, NE–IA MSA	354	100.00	97.87	57.34	66.67	21.75	11.58	18.25	17.85
Portland–Vancouver-Hillsboro, OR–WA MSA	669	100.00	95.37	65.02	97.01	2.84	0.15	35.00	40.34

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: OTHER MULTISTATE MA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Clarksville, TN–KY MSA	14	2,445	67	3,470	81	5,915	100.00	0	0
Davenport–Moline–Rock Island, IA–IL MSA	18	3,726	47	7,881	65	11,607	100.00	0	0
Fargo, ND–MN MSA	35	7,275	120	11,094	155	18,369	100.00	0	0
Grand Forks, ND–MN MSA	12	699	61	5,758	73	6,457	100.00	0	0
Lewiston, ID-WA MSA	10	2,279	25	1,701	35	3,980	100.00	0	0
Logan, UT-ID MSA	6	345	5	436	11	781	100.00	0	0
Omaha-Council Bluffs, NE–IA MSA	35	6,768	328	48,787	363	55,555	100.00	1	488
Portland–Vancouver-Hillsboro, OR–WA MSA	59	28,658	637	155,682	696	184,340	100.00	1	161

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

Institution ID: USBNA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OTHER MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Clarksville, TN–KY MSA	100.00	12	100.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	2.27	18.08	60.08	17.84
Davenport–Moline–Rock Island, IA–IL MSA	100.00	11	100.00	18.18	9.09	45.45	27.27	0	0	0	0	0	0	5.07	17.73	53.92	23.28
Fargo, ND–MN MSA	100.00	7	100.00	14.29	14.29	42.86	28.57	0	0	0	0	0	0	4.49	12.80	56.35	26.36
Grand Forks, ND–MN MSA	100.00	3	100.00	0.00	33.33	33.33	33.33	0	0	0	0	0	0	5.29	16.88	65.76	12.07
Lewiston, ID–WA MSA	100.00	3	100.00	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	23.42	67.79	8.78
Logan, UT-ID MSA	100.00	2	100.00	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.17	26.70	55.37	15.76
Omaha–Council Bluffs, NE–IA MSA	100.00	34	100.00	5.88	26.47	38.24	29.41	1	1	0	1	-1	0	8.93	20.59	40.24	29.92
Portland–Vancouver–Hillsboro, OR–WA MSA	100.00	105	100.00	4.76	29.52	49.52	16.19	6	6	0	-4	3	1	2.70	23.71	48.08	25.50

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: OTHER MULTISTATE MA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Clarksville, TN–KY MSA	100.00	12	100.00	0.00	33.33	66.67	0.00	15	100.00	20.00	20.00	60.00	0.00	2.27	18.08	60.08	17.84
Davenport–Moline–Rock Island, IA–IL MSA	100.00	11	100.00	18.18	9.09	45.45	27.27	17	100.00	11.76	23.53	41.18	23.53	5.07	17.73	53.92	23.28
Fargo, ND–MN MSA	100.00	7	100.00	14.29	14.29	42.86	28.57	25	100.00	16.00	24.00	40.00	20.00	4.49	12.80	56.35	26.36
Grand Forks, ND–MN MSA	100.00	3	100.00	0.00	33.33	33.33	33.33	13	100.00	0.00	23.08	61.54	15.38	5.29	16.88	65.76	12.07
Lewiston, ID-WA MSA	100.00	3	100.00	0.00	66.67	33.33	0.00	6	100.00	0.00	50.00	50.00	0.00	0.00	23.42	67.79	8.78
Logan, UT-ID MSA	100.00	2	100.00	0.00	50.00	50.00	0.00	2	100.00	0.00	50.00	50.00	0.00	2.17	26.70	55.37	15.76
Omaha-Council Bluffs, NE–IA MSA	100.00	34	100.00	5.88	26.47	38.24	29.41	52	100.00	9.62	25.00	38.46	21.15	8.93	20.59	40.24	29.92
Portland–Vancouver-Hillsboro, OR–WA MSA	100.00	105	100.00	4.76	29.52	49.52	16.19	222	100.00	7.21	36.04	41.89	14.86	2.70	23.71	48.08	25.50

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF ARIZONA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Phoenix-Mesa-Scottsdale MSA	81.93	27,993	6,119,470	17,467	279,895	87	1,114	10	54,505	45,557	6,454,984	84.12
Limited Review:												
Lake Havasu City-Kingman MSA	2.77	1,063	158,025	473	9,889	6	67	0	0	1,542	167,981	6.58
Prescott MSA	2.75	952	165,924	574	11,538	4	25	0	0	1,530	177,487	2.55
Tucson MSA	12.54	4,800	778,268	2,153	28,767	18	495	3	331	6,974	807,861	6.75
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	2	10,645	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF ARIZONA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Phoenix-Mesa-Scottsdale MSA	16,085	80.24	3.66	2.10	21.50	18.10	38.07	44.54	36.77	35.26	6.20	7.83	8.01	7.22	4.33
Limited Review:															
Lake Havasu City-Kingman MSA	476	2.37	0.00	0.00	10.07	3.15	83.07	91.39	6.86	5.46	3.50	0.00	1.86	3.54	4.00
Prescott MSA	479	2.39	0.00	0.00	11.57	14.41	68.19	71.19	20.24	14.41	3.41	0.00	6.48	3.43	1.45
Tucson MSA	3,007	15.00	3.46	3.43	22.02	22.08	37.37	41.90	37.15	32.59	5.77	10.58	9.36	6.70	3.75

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF ARIZONA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Phoenix-Mesa-Scottsdale MSA	619	75.40	3.66	0.97	21.50	15.67	38.07	37.48	36.77	45.88	3.12	4.35	4.86	3.02	2.74
Limited Review:															
Lake Havasu City-Kingman MSA	60	7.31	0.00	0.00	10.07	5.00	83.07	81.67	6.86	13.33	7.50	0.00	0.00	6.79	23.08
Prescott MSA	30	3.65	0.00	0.00	11.57	13.33	68.19	70.00	20.24	16.67	3.33	0.00	5.88	3.47	2.04
Tucson MSA	112	13.64	3.46	0.89	22.02	15.18	37.37	41.07	37.15	42.86	4.72	0.00	8.47	6.93	2.54

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF ARIZONA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Phoenix-Mesa-Scottsdale MSA	11,237	80.95	3.66	1.15	21.50	10.32	38.07	34.50	36.77	54.03	1.78	2.09	1.85	1.57	1.93
Limited Review:															
Lake Havasu City-Kingman MSA	527	3.80	0.00	0.00	10.07	3.04	83.07	89.75	6.86	7.21	3.11	0.00	3.53	3.07	3.43
Prescott MSA	442	3.18	0.00	0.00	11.57	8.60	68.19	66.74	20.24	24.66	1.32	0.00	0.85	1.37	1.38
Tucson MSA	1,675	12.07	3.46	1.31	22.02	10.51	37.37	32.00	37.15	56.18	1.52	1.17	1.53	1.54	1.52

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF ARIZONA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Phoenix-Mesa-Scottsdale MSA	36	83.72	15.31	22.22	37.48	52.78	28.73	19.44	18.49	5.56	3.45	4.05	3.33	3.45	2.70
Limited Review:															
Lake Havasu City-Kingman MSA	0	0.00	0.00	0.00	2.82	0.00	89.72	0.00	7.46	0.00	0.00	0.00	0.00	0.00	0.00
Prescott MSA	1	2.33	0.00	0.00	34.40	0.00	44.53	100.00	21.08	0.00	0.00	0.00	0.00	0.00	0.00
Tucson MSA	6	13.95	9.52	33.33	42.07	66.67	29.24	0.00	19.17	0.00	2.47	0.00	4.65	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF ARIZONA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Phoenix-Mesa-Scottsdale MSA	17,414	84.48	6.43	7.79	15.83	15.92	30.97	31.16	46.20	45.13	5.81	5.64	5.62	6.15	5.61
Limited Review:															
Lake Havasu City-Kingman MSA	473	2.29	0.00	0.00	5.49	2.54	87.50	94.71	7.01	2.75	4.76	0.00	2.04	5.04	2.54
Prescott MSA	574	2.78	0.00	0.00	17.84	18.64	56.16	48.43	26.00	32.93	3.48	0.00	3.72	2.66	4.04
Tucson MSA	2,153	10.44	5.78	4.69	25.02	24.06	30.25	31.54	38.95	39.71	4.29	3.29	3.94	4.18	4.56

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF ARIZONA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Phoenix-Mesa-Scottsdale MSA	87	75.65	5.64	3.45	17.18	12.64	34.43	40.23	42.35	43.68	8.55	25.00	4.00	7.25	11.89
Limited Review:															
Lake Havasu City-Kingman MSA	6	5.22	0.00	0.00	5.99	0.00	89.14	100.00	4.87	0.00	20.00	0.00	0.00	25.00	0.00
Prescott MSA	4	3.48	0.00	0.00	11.11	0.00	64.70	100.00	24.19	0.00	1.96	0.00	0.00	0.00	9.09
Tucson MSA	18	15.65	4.38	0.00	22.37	11.11	36.84	38.89	36.41	50.00	7.59	0.00	0.00	12.90	6.67

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF ARIZONA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Phoenix-Mesa-Scottsdale MSA	16,098	80.25	21.18	6.77	17.76	13.75	20.47	16.34	40.59	63.13	1.29	1.33	0.99	1.02	1.57
Limited Review:															
Lake Havasu City-Kingman MSA	476	2.37	18.38	0.69	19.33	9.66	23.40	15.86	38.89	73.79	1.35	0.00	0.47	0.91	1.74
Prescott MSA	479	2.39	18.52	4.61	20.31	11.84	20.86	19.08	40.31	64.47	0.87	0.94	0.89	0.84	0.87
Tucson MSA	3,007	14.99	21.62	6.76	17.84	17.35	19.62	18.24	40.92	57.65	0.60	0.43	0.36	0.36	0.87

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF ARIZONA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Phoenix-Mesa-Scottsdale MSA	619	75.40	21.18	6.54	17.76	20.96	20.47	22.31	40.59	50.19	2.99	2.86	3.82	2.86	2.83
Limited Review:															
Lake Havasu City-Kingman MSA	60	7.31	18.38	6.25	19.33	16.67	23.40	29.17	38.89	47.92	6.36	20.00	8.82	6.67	5.30
Prescott MSA	30	3.65	18.52	3.70	20.31	25.93	20.86	18.52	40.31	51.85	3.02	4.55	3.03	1.69	3.53
Tucson MSA	112	13.64	21.62	8.60	17.84	23.66	19.62	22.58	40.92	45.16	4.34	0.00	5.31	8.28	3.15

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF ARIZONA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Phoenix-Mesa-Scottsdale MSA	11,240	80.96	21.18	7.35	17.76	15.61	20.47	19.68	40.59	57.36	1.99	1.63	1.72	1.70	2.26
Limited Review:															
Lake Havasu City-Kingman MSA	527	3.80	18.38	8.84	19.33	14.63	23.40	21.34	38.89	55.18	2.78	2.90	4.12	1.83	2.78
Prescott MSA	442	3.18	18.52	7.74	20.31	20.74	20.86	20.74	40.31	50.77	1.37	2.20	1.88	0.96	1.30
Tucson MSA	1,675	12.06	21.62	7.63	17.84	17.14	19.62	19.23	40.92	56.01	1.48	0.99	1.93	1.47	1.45

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF ARIZONA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Phoenix-Mesa-Scottsdale MSA	17,467	84.52	80.53	62.95	98.10	0.96	0.93	5.81	7.11
Limited Review:									
Lake Havasu City-Kingman MSA	473	2.29	80.76	56.03	95.98	2.33	1.69	4.76	5.03
Prescott MSA	574	2.78	82.90	65.68	96.34	2.26	1.39	3.48	3.96
Tucson MSA	2,153	10.42	80.01	59.82	98.51	0.93	0.56	4.29	4.77

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF ARIZONA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Phoenix-Mesa-Scottsdale MSA	87	75.65	93.98	58.62	97.70	2.30	0.00	8.55	14.37
Limited Review:									
Lake Havasu City-Kingman MSA	6	5.22	97.75	50.00	100.00	0.00	0.00	20.00	33.33
Prescott MSA	4	3.48	97.67	100.00	100.00	0.00	0.00	1.96	5.26
Tucson MSA	18	15.65	96.26	50.00	94.44	0.00	5.56	7.59	8.11

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF ARIZONA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Phoenix-Mesa-Scottsdale MSA	16	22,283	149	48,840	165	71,123	91.01	1	14
Limited Review:									
Lake Havasu City-Kingman MSA	6	937	9	1,148	15	2,085	2.67	0	0
Prescott MSA	3	268	8	744	11	1,012	1.29	0	0
Tucson MSA	3	179	29	3,594	32	3,773	4.83	0	0
Statewide:									
Qualified Investments That Serve AAs	1	100	14	59	15	159	0.20	0	0
Qualified Investments Outside AAs	0	0	34	47,083	34	47,083	NA	1	25,764

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF ARIZONA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Phoenix-Mesa-Scottsdale MSA	84.12	64	80.00	1.56	20.31	34.38	42.19	6	6	0	1	-3	1	8.18	24.70	36.00	30.95
Limited Review:																	
Lake Havasu City-Kingman MSA	6.58	2	2.50	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	11.26	82.97	5.77
Prescott MSA	2.55	2	2.50	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	15.17	67.84	16.98
Tucson MSA	6.75	12	15.00	8.33	33.33	25.00	33.33	0	2	0	0	0	-2	7.32	28.83	32.76	30.66

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF ARIZONA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Phoenix-Mesa-Scottsdale MSA	84.12	64	80.00	1.56	20.31	34.38	42.19	82	83.67	4.88	18.29	29.27	41.46	8.18	24.70	36.00	30.95
Limited Review:																	
Lake Havasu City-Kingman MSA	6.58	2	2.50	0.00	0.00	100.00	0.00	2	2.04	0.00	0.00	100.00	0.00	0.00	11.26	82.97	5.77
Prescott MSA	2.55	2	2.50	0.00	0.00	50.00	50.00	2	2.04	0.00	0.00	50.00	50.00	0.00	15.17	67.84	16.98
Tucson MSA	6.75	12	15.00	8.33	33.33	25.00	33.33	12	12.24	8.33	33.33	25.00	33.33	7.32	28.83	32.76	30.66

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF ARKANSAS												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Little Rock-North Little Rock-Conway MSA	68.07	8,595	1,345,754	4,927	133,389	57	848	12	15,462	13,591	1,495,453	59.39
Limited Review:												
Fort Smith MSA	3.10	345	34,979	267	8,792	7	70	0	0	619	43,841	5.10
Hot Springs MSA	10.83	838	107,218	1,317	26,485	8	436	0	0	2,163	134,139	14.51
AR NonMSA Total	17.97	1,893	186,223	1,609	19,884	85	884	1	554	3,588	207,545	21.00
Statewide:												
CD Loans That Serve AAs	0.02	NA	NA	NA	NA	NA	NA	4	2,600	4	2,600	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Little Rock-North Little Rock-Conway MSA	4,269	81.22	3.06	1.45	17.40	10.59	49.03	46.19	30.51	41.77	5.48	9.19	5.82	5.40	5.34
Limited Review:															
Fort Smith MSA	157	2.99	0.00	0.00	11.44	7.64	81.09	82.17	7.47	10.19	4.39	0.00	1.14	4.71	4.88
Hot Springs MSA	331	6.30	1.21	2.11	11.65	6.04	55.43	56.19	31.71	35.65	4.45	8.33	3.42	4.96	3.99
AR NonMSA Total	499	9.49	0.00	0.00	2.04	1.40	80.81	82.97	17.15	15.63	4.76	0.00	6.25	4.96	3.69

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Little Rock-North Little Rock-Conway MSA	317	52.92	3.06	2.84	17.40	14.83	49.03	47.32	30.51	35.02	5.96	3.70	4.64	6.13	6.53
Limited Review:															
Fort Smith MSA	34	5.68	0.00	0.00	11.44	2.94	81.09	85.29	7.47	11.76	5.43	0.00	0.00	6.09	0.00
Hot Springs MSA	77	12.85	1.21	1.30	11.65	6.49	55.43	59.74	31.71	32.47	13.59	0.00	6.67	13.64	16.92
AR NonMSA Total	171	28.55	0.00	0.00	2.04	2.92	80.81	78.95	17.15	18.13	9.64	0.00	0.00	9.67	10.71

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF ARKANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Little Rock-North Little Rock-Conway MSA	4,006	68.93	3.06	0.70	17.40	6.94	49.03	47.50	30.51	44.86	6.85	7.37	7.15	7.35	6.20
Limited Review:															
Fort Smith MSA	154	2.65	0.00	0.00	11.44	11.04	81.09	79.87	7.47	9.09	3.62	0.00	4.35	3.61	2.78
Hot Springs MSA	429	7.38	1.21	0.23	11.65	8.86	55.43	53.61	31.71	37.30	7.92	16.67	8.00	9.20	6.11
AR NonMSA Total	1,223	21.04	0.00	0.00	2.04	2.04	80.81	80.62	17.15	17.33	10.17	0.00	4.35	9.76	12.45

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Little Rock-North Little Rock-Conway MSA	3	75.00	9.60	0.00	22.44	0.00	37.67	33.33	30.29	66.67	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Fort Smith MSA	0	0.00	0.00	0.00	22.55	0.00	62.48	0.00	14.98	0.00	0.00	0.00	0.00	0.00	0.00
Hot Springs MSA	1	25.00	4.62	0.00	22.98	100.00	39.78	0.00	32.62	0.00	0.00	0.00	0.00	0.00	0.00
AR NonMSA Total	0	0.00	0.00	0.00	2.18	0.00	59.35	0.00	38.47	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF ARKANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Little Rock-North Little Rock-Conway MSA	4,927	60.68	4.79	3.88	24.65	20.17	38.94	42.76	31.61	33.18	11.45	7.14	10.88	12.40	10.93
Limited Review:															
Fort Smith MSA	267	3.29	0.00	0.00	23.45	28.46	67.89	59.93	8.66	11.61	7.30	0.00	8.12	6.99	6.78
Hot Springs MSA	1,317	16.22	1.56	0.68	18.74	18.22	48.60	49.73	31.10	31.36	19.58	10.00	20.19	20.39	18.60
AR NonMSA Total	1,609	19.82	0.00	0.00	2.29	1.31	80.24	78.87	17.47	19.83	18.57	0.00	11.11	17.77	20.99

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF ARKANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Little Rock-North Little Rock-Conway MSA	57	36.31	2.95	3.51	14.25	8.77	50.22	78.95	32.57	8.77	8.91	0.00	14.71	7.02	12.00
Limited Review:															
Fort Smith MSA	7	4.46	0.00	0.00	8.20	0.00	87.70	85.71	4.10	14.29	7.50	0.00	33.33	5.71	0.00
Hot Springs MSA	8	5.10	0.49	0.00	8.25	37.50	47.57	50.00	43.69	12.50	8.00	0.00	0.00	20.00	0.00
AR NonMSA Total	85	54.14	0.00	0.00	2.47	2.35	78.62	78.82	18.90	18.82	10.22	0.00	0.00	10.45	12.20

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Little Rock-North Little Rock-Conway MSA	4,269	81.22	21.42	12.11	17.98	21.47	20.27	26.48	40.34	39.93	2.83	4.58	2.60	2.71	2.66
Limited Review:															
Fort Smith MSA	157	2.99	20.19	5.56	18.71	30.56	20.75	44.44	40.34	19.44	0.91	0.00	2.23	1.06	0.28
Hot Springs MSA	331	6.30	20.75	8.21	17.25	27.18	21.13	24.10	40.87	40.51	3.08	2.15	5.56	3.77	1.98
AR NonMSA Total	499	9.49	16.82	8.61	18.70	24.04	21.22	22.55	43.26	44.81	3.25	5.08	2.91	2.83	3.33

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Little Rock-North Little Rock-Conway MSA	317	52.92	21.42	12.84	17.98	24.51	20.27	24.12	40.34	38.52	6.05	5.21	5.94	6.67	5.92
Limited Review:															
Fort Smith MSA	34	5.68	20.19	10.00	18.71	16.67	20.75	23.33	40.34	50.00	4.39	22.22	0.00	0.00	5.00
Hot Springs MSA	77	12.85	20.75	8.70	17.25	23.19	21.13	20.29	40.87	47.83	12.83	16.67	7.50	11.90	15.05
AR NonMSA Total	171	28.55	16.82	7.27	18.70	23.64	21.22	21.82	43.26	47.27	10.58	3.57	14.75	6.25	12.14

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Little Rock-North Little Rock-Conway MSA	4,006	68.93	21.42	9.81	17.98	21.57	20.27	24.75	40.34	43.87	5.78	5.73	6.62	6.66	5.10
Limited Review:															
Fort Smith MSA	154	2.65	20.19	9.92	18.71	16.53	20.75	31.40	40.34	42.15	3.23	2.78	2.94	4.04	3.04
Hot Springs MSA	429	7.38	20.75	7.08	17.25	22.15	21.13	18.77	40.87	52.00	7.16	3.77	8.40	6.58	7.44
AR NonMSA Total	1,223	21.04	16.82	5.51	18.70	17.23	21.22	23.15	43.26	54.11	10.16	8.22	10.67	9.92	10.35

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF ARKANSAS									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Little Rock-North Little Rock-Conway MSA	4,927	60.68	77.28	62.35	96.41	1.32	2.27	11.45	13.06
Limited Review:									
Fort Smith MSA	267	3.29	78.19	54.68	94.38	1.87	3.75	7.30	6.73
Hot Springs MSA	1,317	16.22	80.00	69.17	96.81	1.37	1.82	19.58	26.22
AR NonMSA Total	1,609	19.82	79.81	68.18	99.07	0.75	0.19	18.57	20.10

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF ARKANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Little Rock-North Little Rock-Conway MSA	57	36.31	97.27	66.67	98.25	1.75	0.00	8.91	8.00
Limited Review:									
Fort Smith MSA	7	4.46	96.72	42.86	100.00	0.00	0.00	7.50	3.13
Hot Springs MSA	8	5.10	97.09	75.00	87.50	0.00	12.50	8.00	0.00
AR NonMSA Total	85	54.14	97.70	68.24	100.00	0.00	0.00	10.22	8.41

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF ARKANSAS Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Little Rock-North Little Rock-Conway MSA	18	13,253	164	23,607	182	36,860	90.31	1	110
Limited Review									
Fort Smith MSA	9	422	6	7	15	429	1.05	0	0
Hot Springs MSA	11	725	12	365	23	1,090	2.67	0	0
AR NonMSA Total	26	1,804	8	621	34	2,425	5.94	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	4	11	4	11	0.03	0	0
Qualified Investments Outside AAs	2	697	37	37,902	39	38,599	NA	2	90

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF ARKANSAS																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Little Rock-North Little Rock-Conway MSA	59.39	21	50.00	0.00	33.33	23.81	42.86	0	1	0	-1	0	0	5.52	20.79	45.41	28.27
Limited Review:																	
Fort Smith MSA	5.10	3	7.14	0.00	33.33	33.33	33.33	0	1	0	-1	0	0	0.00	14.47	78.67	6.86
Hot Springs MSA	14.51	6	14.29	0.00	16.67	33.33	50.00	0	0	0	0	0	0	2.08	15.93	53.71	28.28
AR NonMSA Total	21.00	12	28.57	0.00	8.33	83.33	8.33	0	1	0	0	-1	0	0.00	2.07	77.80	20.13

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography:																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Little Rock-North Little Rock-Conway MSA	59.39	21	50.00	0.00	33.33	23.81	42.86	22	50.00	0.00	36.36	22.73	40.91	5.52	20.79	45.41	28.27
Limited Review:																	
Fort Smith MSA	5.10	3	7.14	0.00	33.33	33.33	33.33	3	6.82	0.00	33.33	33.33	33.33	0.00	14.47	78.67	6.86
Hot Springs MSA	14.51	6	14.29	0.00	16.67	33.33	50.00	6	13.64	0.00	16.67	33.33	50.00	2.08	15.93	53.71	28.28
AR NonMSA Total	21.00	12	28.57	0.00	8.33	83.33	8.33	13	29.55	0.00	7.69	69.23	23.08	0.00	2.07	77.80	20.13

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF CALIFORNIA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Los Angeles-Long Beach-Glendale MD	24.27	21,069	8,822,672	52,643	1,190,197	124	2,113	88	898,460	73,924	10,913,442	22.99
Sacramento-Arden Arcade-Roseville MSA	7.76	8,413	2,204,819	15,062	407,993	147	4,304	26	268,830	23,648	2,885,946	22.43
Limited Review:												
Anaheim-Santa Ana-Irvine MD	9.76	9,916	4,330,015	19,740	518,016	50	546	16	93,217	29,722	4,941,794	10.77
Bakersfield MSA	1.25	2,242	395,987	1,526	41,536	36	653	1	14,275	3,805	452,451	0.07
Chico MSA	0.91	727	123,558	1,971	47,276	86	1,343	2	1,250	2,786	173,427	0.56
Modesto MSA	1.05	1,208	217,521	1,877	59,803	98	1,802	0	0	3,183	279,126	0.55
Napa MSA	0.62	487	174,570	1,349	22,762	44	500	0	0	1,880	197,832	0.27
Oakland-Haywood-Berkeley MD	9.03	11,840	5,069,822	15,601	376,272	56	478	14	44,889	27,511	5,491,461	6.42
Oxnard-Thousand Oaks-Ventura MSA	2.04	3,015	1,126,070	3,153	60,278	39	1,079	7	17,466	6,214	1,204,893	0.94
Redding MSA	0.77	770	124,036	1,557	27,575	18	193	0	0	2,345	151,804	0.61
Riverside-San Bernardino-Ontario MSA	9.64	13,114	2,903,441	16,116	377,173	109	1,102	17	182,801	29,356	3,464,517	7.95
Salinas MSA	0.60	781	318,077	1,014	21,507	26	481	3	23,632	1,824	363,697	0.05
San Diego-Carlsbad-San Marcos MSA	10.39	12,241	4,875,054	19,254	543,356	122	1,269	32	268,025	31,649	5,687,704	10.44
San Francisco (SF)-Redwood City-South SF MD 2012-2013	3.76	5,673	2,727,604	5,749	163,553	10	200	5	24,921	11,437	2,916,278	3.25
San Francisco (SF)-Redwood City-South SF MD 2014-2015	2.33	1,872	1,152,777	5,194	123,014	25	645	9	101,559	7,100	1,377,995	2.93
San Jose-Sunnyvale-Santa Clara MSA	5.71	8,761	4,631,712	8,611	224,062	18	164	10	144,479	17,400	5,000,417	4.01
San Luis Obispo-Paso Robles-Arroyo Grande MSA	0.72	1,103	375,800	1,054	28,030	38	1,409	0	0	2,195	405,239	0.32
San Rafael MD 2014-2015	0.70	368	250,974	1,760	34,624	15	140	0	0	2,143	285,738	0.32
Santa Cruz-Watsonville MSA	0.83	979	424,059	1,515	20,972	40	332	0	0	2,534	445,363	0.38
Santa Maria-Santa Barbara MSA	0.72	1,041	425,330	1,123	19,325	32	327	7	13,961	2,203	458,943	0.16
Santa Rosa MSA	1.90	1,436	504,684	4,251	93,959	111	953	4	51,133	5,802	650,729	0.72
Stockton-Lodi MSA	0.97	1,499	321,973	1,407	32,165	38	533	6	29,486	2,950	384,157	0.39
Vallejo-Fairfield MSA	0.96	1,195	301,943	1,709	35,033	24	229	0	0	2,928	337,205	0.73
Yuba City MSA	0.48	396	68,823	961	20,108	94	2,897	0	0	1,451	91,828	0.24
CA NonMSA Total	2.81	2,361	457,558	5,812	118,443	379	8,893	8	17,350	8,560	602,244	2.50
Statewide:												
CD Loans That Serve AAs	0.01	NA	NA	NA	NA	NA	NA	17	19,763	17	19,763	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	8	21,795	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.

*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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-Long Beach-Glendale MD	5,794	16.17	2.13	2.04	16.61	15.84	28.65	26.51	52.61	55.61	2.23	2.09	2.73	2.47	1.94
Sacramento-Arden Arcade-Roseville MSA	3,072	8.57	3.73	4.49	17.99	21.61	41.15	38.96	37.13	34.93	3.19	5.69	5.03	3.16	2.19
Limited Review:															
Anaheim-Santa Ana-Irvine MD	2,747	7.67	2.99	1.24	19.61	11.21	33.21	29.67	44.19	57.88	2.43	1.96	1.72	2.16	2.88
Bakersfield MSA	1,623	4.53	2.00	0.86	23.16	17.68	30.78	30.68	44.06	50.77	5.55	7.69	7.41	6.72	4.47
Chico MSA	204	0.57	0.28	0.00	14.47	17.16	56.01	56.37	29.24	26.47	2.84	0.00	3.74	3.62	1.20
Modesto MSA	527	1.47	1.15	0.95	14.56	17.46	44.38	49.53	39.91	32.07	3.34	0.00	5.47	3.66	2.39
Napa MSA	121	0.34	0.00	0.00	22.42	23.97	45.50	41.32	32.09	34.71	1.83	0.00	0.99	1.92	2.39
Oakland-Haywood-Berkeley MD	3,900	10.88	5.73	4.82	15.64	13.49	36.39	35.90	42.23	45.79	3.34	4.39	3.46	3.08	3.39
Oxnard-Thousand Oaks-Ventura MSA	960	2.68	1.92	1.67	17.13	16.67	43.17	43.96	37.79	37.71	2.81	1.74	3.71	2.90	2.40
Redding MSA	263	0.73	0.00	0.00	20.80	23.95	53.76	53.61	25.44	22.43	3.69	0.00	3.94	3.67	3.48
Riverside-San Bernardino-Ontario MSA	5,044	14.08	2.87	2.99	21.60	19.73	36.29	39.37	39.24	37.91	2.78	4.39	3.80	3.03	1.98
Salinas MSA	283	0.79	1.79	0.71	16.11	12.72	37.70	32.86	44.41	53.71	1.93	2.17	2.49	1.67	1.95
San Diego-Carlsbad-San Marcos MSA	3,864	10.78	3.31	2.48	14.32	10.56	38.78	32.74	43.59	54.22	2.84	2.80	2.79	2.52	3.14
San Francisco (SF)-Redwood City-South SF MD 2012-2013	943	2.63	3.41	2.86	14.46	12.20	39.92	40.93	42.21	44.01	2.00	1.48	1.45	2.31	1.96
San Francisco (SF)-Redwood City-South SF MD 2014-2015	470	1.31	3.25	5.96	12.32	12.34	42.73	46.38	41.70	35.32	2.24	1.85	2.44	2.56	1.93
San Jose-Sunnyvale-Santa Clara MSA	2,364	6.60	4.49	3.47	17.93	18.61	38.99	40.95	38.60	36.97	2.88	2.77	2.88	2.62	3.27
San Luis Obispo-Paso Robles-Arroyo Grande MSA	390	1.09	0.30	0.26	5.63	6.15	66.30	62.05	27.78	31.54	2.28	0.00	2.41	1.93	3.23
San Rafael MD 2014-2015	98	0.27	1.19	0.00	14.78	12.24	56.49	65.31	27.54	22.45	1.65	0.00	1.39	1.99	1.15
Santa Cruz-Watsonville MSA	282	0.79	0.47	0.71	22.33	13.83	36.59	37.23	40.62	48.23	2.28	0.00	2.23	1.91	2.68
Santa Maria-Santa Barbara MSA	434	1.21	2.85	2.76	15.09	19.35	34.95	44.01	47.11	33.87	3.14	2.83	4.45	3.28	2.32
Santa Rosa MSA	402	1.12	0.09	0.25	16.64	17.91	58.49	54.23	24.78	27.61	1.88	0.00	1.89	1.92	1.76
Stockton-Lodi MSA	831	2.32	2.21	2.53	20.81	26.96	32.98	35.98	44.00	34.54	4.05	5.07	8.32	4.66	2.18
Vallejo-Fairfield MSA	377	1.05	0.55	1.06	16.50	19.63	51.00	49.60	31.95	29.71	2.57	5.71	3.80	2.88	1.58
Yuba City MSA	219	0.61	1.36	0.91	19.05	26.03	36.03	40.18	43.56	32.88	4.97	2.94	6.67	5.93	3.61
CA NonMSA Total	622	1.74	0.26	0.00	14.50	12.70	60.10	55.95	25.15	31.35	2.41	0.00	3.32	2.51	1.97

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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-Long Beach-Glendale MD	1,317	22.00	2.13	0.91	16.61	11.09	28.65	28.40	52.61	59.61	3.67	1.85	2.21	3.70	4.09
Sacramento-Arden Arcade-Roseville MSA	482	8.05	3.73	2.07	17.99	14.73	41.15	40.04	37.13	43.15	3.49	4.27	4.56	2.90	3.68
Limited Review:															
Anaheim-Santa Ana-Irvine MD	504	8.42	2.99	1.39	19.61	9.92	33.21	32.74	44.19	55.95	3.92	0.00	2.57	2.93	5.29
Bakersfield MSA	41	0.68	2.00	2.44	23.16	17.07	30.78	19.51	44.06	60.98	0.94	0.00	0.00	1.39	0.98
Chico MSA	71	1.19	0.28	0.00	14.47	7.04	56.01	63.38	29.24	29.58	11.47	0.00	5.00	13.89	10.11
Modesto MSA	75	1.25	1.15	0.00	14.56	14.67	44.38	41.33	39.91	44.00	3.83	0.00	8.75	3.17	3.54
Napa MSA	26	0.43	0.00	0.00	22.42	19.23	45.50	38.46	32.09	42.31	2.17	0.00	1.75	4.44	0.00
Oakland-Haywood-Berkeley MD	445	7.43	5.73	4.04	15.64	12.13	36.39	32.81	42.23	51.01	2.97	2.19	2.20	2.50	3.79
Oxnard-Thousand Oaks-Ventura MSA	122	2.04	1.92	2.46	17.13	11.48	43.17	37.70	37.79	48.36	2.76	5.26	2.96	2.16	3.23
Redding MSA	73	1.22	0.00	0.00	20.80	10.96	53.76	68.49	25.44	20.55	9.42	0.00	10.00	9.60	8.62
Riverside-San Bernardino-Ontario MSA	898	15.00	2.87	1.22	21.60	15.14	36.29	34.97	39.24	48.66	4.40	5.22	4.80	4.58	4.13
Salinas MSA	27	0.45	1.79	3.70	16.11	3.70	37.70	29.63	44.41	62.96	1.67	0.00	1.61	0.83	2.31
San Diego-Carlsbad-San Marcos MSA	556	9.29	3.31	1.08	14.32	9.71	38.78	37.59	43.59	51.62	3.62	1.43	3.49	3.70	3.74
San Francisco (SF)-Redwood City-South SF MD 2012-2013	213	3.56	3.41	2.82	14.46	15.96	39.92	36.62	42.21	44.60	5.75	2.56	6.74	5.55	5.89
San Francisco (SF)-Redwood City-South SF MD 2014-2015	213	3.56	3.25	1.88	12.32	12.21	42.73	39.44	41.70	46.48	5.06	1.18	4.25	5.20	5.49
San Jose-Sunnyvale-Santa Clara MSA	329	5.50	4.49	2.43	17.93	13.98	38.99	32.52	38.60	51.06	4.03	0.63	3.05	4.72	4.26
San Luis Obispo-Paso Robles-Arroyo Grande MSA	49	0.82	0.30	0.00	5.63	8.16	66.30	71.43	27.78	20.41	2.50	0.00	0.00	2.95	1.79
San Rafael MD 2014-2015	31	0.52	1.19	0.00	14.78	12.90	56.49	51.61	27.54	35.48	3.60	0.00	2.60	2.89	5.21
Santa Cruz-Watsonville MSA	63	1.05	0.47	1.59	22.33	20.63	36.59	30.16	40.62	47.62	1.88	0.00	1.22	2.75	1.56
Santa Maria-Santa Barbara MSA	29	0.48	2.85	0.00	15.09	6.90	34.95	24.14	47.11	68.97	1.77	0.00	0.00	0.00	3.96
Santa Rosa MSA	88	1.47	0.09	0.00	16.64	7.95	58.49	57.95	24.78	34.09	3.64	0.00	2.73	3.33	4.67
Stockton-Lodi MSA	63	1.05	2.21	0.00	20.81	3.17	32.98	34.92	44.00	61.90	1.96	0.00	0.72	1.18	2.89
Vallejo-Fairfield MSA	66	1.10	0.55	0.00	16.50	19.70	51.00	51.52	31.95	28.79	2.90	0.00	5.79	2.99	1.65
Yuba City MSA	23	0.38	1.36	0.00	19.05	17.39	36.03	34.78	43.56	47.83	4.55	0.00	6.06	4.40	4.31
CA NonMSA Total	183	3.06	0.26	0.55	14.50	10.93	60.10	63.93	25.15	24.59	9.36	0.00	11.76	11.43	5.65

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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-Long Beach-Glendale MD	13,829	19.67	2.13	1.06	16.61	9.30	28.65	21.06	52.61	68.58	1.58	1.07	1.05	1.20	1.92
Sacramento-Arden Arcade-Roseville MSA	4,813	6.85	3.73	2.02	17.99	12.78	41.15	37.88	37.13	47.33	1.62	1.32	1.48	1.49	1.80
Limited Review:															
Anaheim-Santa Ana-Irvine MD	6,655	9.47	2.99	1.28	19.61	10.82	33.21	29.24	44.19	58.66	1.84	0.74	1.04	1.56	2.37
Bakersfield MSA	570	0.81	2.00	0.53	23.16	9.12	30.78	25.61	44.06	64.74	0.70	1.92	0.43	1.00	0.62
Chico MSA	445	0.63	0.28	0.67	14.47	10.34	56.01	51.69	29.24	37.30	2.92	0.00	2.30	3.18	2.84
Modesto MSA	603	0.86	1.15	0.17	14.56	9.29	44.38	42.45	39.91	48.09	1.09	0.00	1.22	1.15	1.02
Napa MSA	340	0.48	0.00	0.00	22.42	18.24	45.50	36.76	32.09	45.00	2.09	0.00	1.40	1.66	3.17
Oakland-Haywood-Berkeley MD	7,429	10.57	5.73	2.33	15.64	9.66	36.39	29.79	42.23	58.22	1.98	1.23	1.20	1.65	2.57
Oxnard-Thousand Oaks-Ventura MSA	1,932	2.75	1.92	0.88	17.13	9.52	43.17	37.94	37.79	51.66	1.41	1.08	1.47	1.05	1.81
Redding MSA	432	0.61	0.00	0.00	20.80	16.90	53.76	55.56	25.44	27.55	2.67	0.00	2.38	2.58	3.03
Riverside-San Bernardino-Ontario MSA	7,144	10.16	2.87	1.50	21.60	13.49	36.29	35.61	39.24	49.40	1.42	2.05	1.56	1.31	1.44
Salinas MSA	469	0.67	1.79	0.85	16.11	7.46	37.70	31.77	44.41	59.91	1.30	1.33	0.88	1.07	1.64
San Diego-Carlsbad-San Marcos MSA	7,789	11.08	3.31	1.77	14.32	9.14	38.78	31.60	43.59	57.49	1.86	1.05	1.25	1.48	2.38
San Francisco (SF)-Redwood City-South SF MD 2012-2013	4,498	6.40	3.41	2.02	14.46	13.36	39.92	41.75	42.21	42.86	2.76	1.76	2.69	2.99	2.67
San Francisco (SF)-Redwood City-South SF MD 2014-2015	1,179	1.68	3.25	1.70	12.32	9.84	42.73	43.94	41.70	44.53	2.66	1.04	2.07	2.70	2.94
San Jose-Sunnyvale-Santa Clara MSA	6,063	8.62	4.49	2.08	17.93	12.70	38.99	35.08	38.60	50.14	2.20	0.83	1.84	2.24	2.50
San Luis Obispo-Paso Robles-Arroyo Grande MSA	663	0.94	0.30	0.30	5.63	5.43	66.30	66.97	27.78	27.30	1.30	0.00	0.93	1.32	1.39
San Rafael MD 2014-2015	239	0.34	1.19	0.00	14.78	15.06	56.49	56.90	27.54	28.03	2.53	0.00	2.32	2.60	2.60
Santa Cruz-Watsonville MSA	633	0.90	0.47	0.16	22.33	16.43	36.59	39.65	40.62	43.76	1.89	0.00	1.13	1.78	2.38
Santa Maria-Santa Barbara MSA	577	0.82	2.85	1.56	15.09	11.27	34.95	36.74	47.11	50.43	1.24	0.93	0.60	1.25	1.47
Santa Rosa MSA	944	1.34	0.09	0.00	16.64	11.44	58.49	59.22	24.78	29.34	1.23	0.00	0.80	1.26	1.47
Stockton-Lodi MSA	598	0.85	2.21	0.33	20.81	8.86	32.98	28.09	44.00	62.71	0.74	1.39	0.90	0.58	0.78
Vallejo-Fairfield MSA	748	1.06	0.55	1.07	16.50	11.50	51.00	41.84	31.95	45.59	1.28	0.00	1.40	1.06	1.53
Yuba City MSA	153	0.22	1.36	0.00	19.05	11.76	36.03	45.75	43.56	42.48	0.64	0.00	0.26	0.90	0.57
CA NonMSA Total	1,551	2.21	0.26	0.13	14.50	10.83	60.10	63.51	25.15	25.53	3.27	9.09	3.79	3.91	2.05

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Los Angeles-Long Beach-Glendale MD	122	32.11	13.18	19.67	31.63	41.80	24.71	22.95	30.48	15.57	0.31	0.46	0.24	0.33	0.30
Sacramento-Arden Arcade-Roseville MSA	46	12.11	11.50	15.22	34.86	47.83	35.67	28.26	17.96	8.70	1.95	4.08	1.56	1.56	1.85
Limited Review:															
Anaheim-Santa Ana-Irvine MD	8	2.11	10.56	25.00	35.81	0.00	32.80	37.50	20.84	37.50	0.00	0.00	0.00	0.00	0.00
Bakersfield MSA	8	2.11	8.38	25.00	37.14	12.50	27.60	37.50	26.88	25.00	3.66	0.00	0.00	8.33	6.25
Chico MSA	7	1.84	6.12	14.29	37.46	28.57	39.37	28.57	17.06	28.57	6.90	0.00	10.00	0.00	12.50
Modesto MSA	3	0.79	6.64	0.00	17.98	66.67	50.02	33.33	25.36	0.00	2.63	0.00	7.14	0.00	0.00
Napa MSA	0	0.00	0.00	0.00	46.75	0.00	34.77	0.00	18.48	0.00	0.00	0.00	0.00	0.00	0.00
Oakland-Haywood-Berkeley MD	66	17.37	19.71	30.30	31.65	42.42	34.25	24.24	14.38	3.03	1.73	1.41	2.42	1.29	1.09
Oxnard-Thousand Oaks-Ventura MSA	1	0.26	7.56	0.00	34.46	0.00	46.44	100.00	11.54	0.00	0.00	0.00	0.00	0.00	0.00
Redding MSA	2	0.53	0.00	0.00	53.33	100.00	35.30	0.00	11.38	0.00	0.00	0.00	0.00	0.00	0.00
Riverside-San Bernardino-Ontario MSA	28	7.37	11.28	10.71	36.12	64.29	35.44	25.00	17.17	0.00	1.89	2.15	1.76	2.59	0.00
Salinas MSA	2	0.53	8.24	0.00	33.38	0.00	40.99	100.00	17.39	0.00	1.64	0.00	0.00	4.76	0.00
San Diego-Carlsbad-San Marcos MSA	32	8.42	14.62	25.00	26.63	53.13	33.39	12.50	25.36	9.38	0.43	0.40	0.31	0.42	0.88
San Francisco (SF)-Redwood City-South SF MD 2012-2013	18	4.74	26.66	16.67	14.81	33.33	29.94	33.33	28.59	16.67	0.86	0.45	2.07	1.41	0.00
San Francisco (SF)-Redwood City-South SF MD 2014-2015	10	2.63	26.82	30.00	12.92	30.00	29.46	10.00	30.79	30.00	0.57	1.27	1.24	0.35	0.00
San Jose-Sunnyvale-Santa Clara MSA	5	1.32	10.25	40.00	31.90	20.00	39.75	40.00	18.10	0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo-Paso Robles-Arroyo Grande MSA	1	0.26	1.18	0.00	13.55	100.00	63.47	0.00	21.79	0.00	0.00	0.00	0.00	0.00	0.00
San Rafael MD 2014-2015	0	0.00	9.04	0.00	24.21	0.00	53.11	0.00	13.64	0.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz-Watsonville MSA	1	0.26	5.53	0.00	39.40	0.00	43.08	100.00	11.99	0.00	0.00	0.00	0.00	0.00	0.00
Santa Maria-Santa Barbara MSA	1	0.26	19.05	0.00	29.23	0.00	29.08	100.00	22.64	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa MSA	2	0.53	1.80	0.00	38.46	50.00	51.56	50.00	8.17	0.00	0.00	0.00	0.00	0.00	0.00
Stockton-Lodi MSA	7	1.84	21.80	14.29	33.80	57.14	28.11	28.57	16.29	0.00	2.04	0.00	5.56	0.00	0.00
Vallejo-Fairfield MSA	4	1.05	5.68	0.00	36.67	50.00	46.23	50.00	11.42	0.00	7.50	0.00	7.69	7.69	0.00
Yuba City MSA	1	0.26	3.75	0.00	55.92	100.00	27.65	0.00	12.68	0.00	11.11	0.00	20.00	0.00	0.00
CA NonMSA Total	5	1.32	0.70	0.00	36.73	40.00	56.80	40.00	5.78	20.00	3.85	0.00	8.33	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles-Long Beach-Glendale MD	52,052	27.53	6.42	7.45	18.23	19.14	25.19	26.71	48.90	46.71	5.75	7.70	6.32	5.86	5.27
Sacramento-Arden Arcade-Roseville MSA	15,062	7.97	6.92	6.63	20.99	19.51	38.74	38.39	33.34	35.47	9.10	9.20	9.63	9.12	8.60
Limited Review:															
Anaheim-Santa Ana-Irvine MD	19,465	10.29	4.74	5.57	25.30	23.83	32.74	34.51	36.17	36.09	5.43	5.86	5.61	5.94	4.85
Bakersfield MSA	1,526	0.81	3.74	4.46	20.64	15.60	29.84	30.14	45.77	49.80	3.44	3.77	2.89	3.81	3.07
Chico MSA	1,971	1.04	0.35	0.25	28.28	25.11	43.15	42.21	28.22	32.42	10.27	8.33	12.03	10.39	8.44
Modesto MSA	1,877	0.99	2.35	2.40	19.09	19.77	44.44	40.70	34.13	37.13	6.40	8.42	7.93	5.53	6.08
Napa MSA	1,310	0.69	0.00	0.00	29.76	30.31	40.86	40.61	28.42	29.08	9.77	0.00	10.00	9.93	8.57
Oakland-Haywood-Berkeley MD	15,601	8.25	10.25	7.33	17.68	17.49	31.90	34.24	40.14	40.93	6.35	6.22	6.87	6.83	5.83
Oxnard-Thousand Oaks-Ventura MSA	3,153	1.67	3.41	2.98	18.72	16.68	44.63	48.37	33.24	31.97	4.87	4.23	4.94	5.62	4.03
Redding MSA	1,557	0.82	0.00	0.00	34.32	27.17	47.65	57.10	18.03	15.74	13.38	0.00	11.99	15.03	10.16
Riverside-San Bernardino-Ontario MSA	16,114	8.52	4.49	2.54	24.05	20.58	34.05	33.80	37.33	43.07	6.41	4.96	5.99	6.44	6.77
Salinas MSA	1,012	0.54	1.35	0.99	18.96	19.66	39.14	43.28	40.02	36.07	4.55	2.38	5.27	4.27	4.18
San Diego-Carlsbad-San Marcos MSA	19,243	10.18	5.79	4.90	15.55	15.30	35.28	35.95	43.27	43.85	6.59	7.04	7.07	6.83	6.26
San Francisco (SF)-Redwood City-South SF MD 2012-2013	5,749	3.04	16.10	12.65	12.82	14.55	30.59	37.20	40.39	35.60	5.54	4.83	5.73	6.25	5.05
San Francisco (SF)-Redwood City-South SF MD 2014-2015	5,191	2.75	17.91	14.39	11.22	12.10	31.63	39.40	39.15	34.12	4.40	4.12	3.99	4.84	4.21
San Jose-Sunnyvale-Santa Clara MSA	8,606	4.55	6.07	4.31	21.25	21.76	34.50	37.57	38.02	36.36	4.83	3.59	5.19	4.80	4.84
San Luis Obispo-Paso Robles-Arroyo Grande MSA	1,054	0.56	2.04	1.61	10.41	9.77	60.58	62.52	26.91	26.09	4.91	2.00	5.22	5.38	3.77
San Rafael MD 2014-2015	1,760	0.93	4.10	5.23	14.05	14.55	55.09	58.58	26.77	21.65	8.95	10.96	9.24	9.33	7.03
Santa Cruz-Watsonville MSA	1,515	0.80	2.04	0.40	21.26	20.86	43.55	47.99	33.14	30.76	7.19	1.18	6.24	8.19	6.70
Santa Maria-Santa Barbara MSA	1,120	0.59	13.10	9.64	21.62	25.36	26.44	27.95	38.27	37.05	4.30	3.89	6.10	4.75	3.19
Santa Rosa MSA	4,251	2.25	3.57	3.32	19.97	18.94	53.04	52.83	23.42	24.91	10.28	16.02	9.12	10.14	9.77
Stockton-Lodi MSA	1,407	0.74	8.10	4.90	22.30	17.13	31.02	29.28	38.58	48.69	3.77	2.69	3.81	3.49	3.96
Vallejo-Fairfield MSA	1,709	0.90	2.01	2.69	24.26	21.47	47.16	50.03	26.39	25.80	8.12	20.75	7.44	8.36	6.96
Yuba City MSA	961	0.51	0.62	0.52	32.77	24.04	31.84	34.24	34.77	41.21	9.42	8.33	8.66	8.52	9.81
CA NonMSA Total	5,812	3.07	0.23	0.22	19.58	19.15	60.86	65.76	19.33	14.87	13.94	27.27	15.06	13.95	9.68

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Los Angeles-Long Beach-Glendale MD	123	6.92	3.29	5.69	16.29	19.51	26.79	19.51	52.98	55.28	16.23	25.00	17.50	15.66	16.56
Sacramento-Arden Arcade-Roseville MSA	147	8.27	3.70	2.72	16.24	7.48	46.55	59.18	33.51	30.61	11.44	0.00	0.00	14.76	10.00
Limited Review:															
Anaheim-Santa Ana-Irvine MD	50	2.81	4.86	2.00	25.90	22.00	33.32	34.00	35.44	42.00	20.59	20.00	17.39	28.00	17.39
Bakersfield MSA	36	2.02	1.24	0.00	28.09	13.89	29.44	25.00	41.17	61.11	5.15	0.00	5.77	3.57	5.56
Chico MSA	86	4.84	0.38	0.00	21.40	26.74	35.99	37.21	42.23	36.05	18.13	0.00	16.67	27.27	9.52
Modesto MSA	98	5.51	0.83	0.00	8.48	4.08	50.96	67.35	39.73	28.57	7.23	0.00	3.13	8.97	3.95
Napa MSA	44	2.47	0.00	0.00	15.05	13.64	32.23	31.82	52.61	54.55	11.20	0.00	0.00	7.84	17.65
Oakland-Haywood-Berkeley MD	56	3.15	6.28	1.79	16.06	14.29	34.69	32.14	42.96	51.79	18.12	0.00	50.00	28.26	10.98
Oxnard-Thousand Oaks-Ventura MSA	39	2.19	5.68	7.69	25.50	23.08	44.38	41.03	24.44	28.21	11.60	14.29	10.81	10.26	14.89
Redding MSA	18	1.01	0.00	0.00	23.72	61.11	52.04	33.33	24.25	5.56	13.16	0.00	28.57	5.88	0.00
Riverside-San Bernardino-Ontario MSA	109	6.13	4.03	6.42	23.08	20.18	35.35	29.36	37.54	44.04	17.96	23.08	15.38	21.05	17.59
Salinas MSA	26	1.46	0.71	7.69	14.69	26.92	43.19	34.62	40.96	30.77	7.93	100.00	9.09	7.81	4.84
San Diego-Carlsbad-San Marcos MSA	122	6.86	3.73	0.82	16.20	11.48	38.95	32.79	41.12	54.92	24.60	33.33	33.33	25.32	23.74
San Francisco (SF)-Redwood City-South SF MD 2012-2013	10	0.56	8.77	0.00	14.21	0.00	35.21	10.00	41.76	90.00	8.20	0.00	0.00	2.50	12.70
San Francisco (SF)-Redwood City-South SF MD 2014-2015	25	1.41	7.71	0.00	14.36	12.00	35.92	20.00	41.95	68.00	15.29	0.00	20.00	3.70	32.35
San Jose-Sunnyvale-Santa Clara MSA	18	1.01	7.49	0.00	22.47	5.56	34.34	27.78	35.60	66.67	6.86	0.00	0.00	5.13	11.90
San Luis Obispo-Paso Robles-Arroyo Grande MSA	38	2.14	0.48	5.26	5.90	5.26	64.38	55.26	29.24	34.21	8.52	100.00	33.33	7.14	5.56
San Rafael MD 2014-2015	15	0.84	4.66	0.00	17.32	0.00	59.10	60.00	18.92	40.00	4.35	0.00	33.33	0.00	10.00
Santa Cruz-Watsonville MSA	40	2.25	1.49	0.00	28.11	22.50	38.40	50.00	32.00	27.50	12.16	0.00	5.41	12.50	16.67
Santa Maria-Santa Barbara MSA	32	1.80	6.43	15.63	16.35	9.38	24.68	37.50	52.30	37.50	10.53	0.00	4.76	19.44	10.71
Santa Rosa MSA	111	6.24	0.79	0.00	12.46	2.70	56.23	57.66	30.51	39.64	16.89	0.00	12.50	15.87	20.00
Stockton-Lodi MSA	38	2.14	4.61	0.00	12.02	7.89	31.41	42.11	51.96	50.00	2.35	0.00	7.69	2.29	1.19
Vallejo-Fairfield MSA	24	1.35	0.41	0.00	11.50	29.17	56.16	45.83	31.94	25.00	23.64	0.00	100.00	15.00	33.33
Yuba City MSA	94	5.29	0.10	0.00	6.99	4.26	37.82	24.47	55.09	71.28	15.58	0.00	7.14	11.54	17.83
CA NonMSA Total	379	21.32	0.03	0.53	17.05	9.50	68.35	84.17	14.57	5.80	21.38	100.00	22.03	20.13	10.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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-Long Beach-Glendale MD	5,796	16.17	24.05	0.44	16.43	3.37	17.64	8.48	41.88	87.72	1.01	0.13	0.23	0.41	1.23
Sacramento-Arden Arcade-Roseville MSA	3,072	8.57	22.01	13.13	17.00	14.37	19.98	14.15	41.01	58.35	1.05	1.09	0.56	0.57	1.44
Limited Review:															
Anaheim-Santa Ana-Irvine MD	2,748	7.67	22.02	0.95	17.33	7.13	19.49	12.30	41.16	79.62	1.67	0.44	0.79	0.72	2.12
Bakersfield MSA	1,623	4.53	23.03	6.00	17.18	18.00	17.96	10.00	41.83	66.00	0.18	0.43	0.34	0.15	0.15
Chico MSA	204	0.57	22.10	2.73	17.16	6.36	19.36	22.73	41.38	68.18	0.92	0.94	0.26	0.84	1.13
Modesto MSA	527	1.47	22.58	4.88	16.69	15.85	19.60	14.63	41.12	64.63	0.36	0.00	0.50	0.20	0.43
Napa MSA	121	0.34	21.89	1.35	16.70	4.05	20.35	20.27	41.06	74.32	1.45	0.00	0.00	1.32	1.69
Oakland-Haywood-Berkeley MD	3,900	10.88	23.31	2.84	16.42	7.64	19.15	12.16	41.12	77.36	1.81	0.81	0.42	0.71	2.50
Oxnard-Thousand Oaks-Ventura MSA	960	2.68	21.43	2.00	17.35	7.20	20.51	10.80	40.71	80.00	0.81	0.00	0.51	0.30	1.11
Redding MSA	263	0.73	22.67	8.73	18.03	15.87	19.08	15.87	40.22	59.52	1.17	5.19	0.51	0.63	1.44
Riverside-San Bernardino-Ontario MSA	5,044	14.07	21.83	4.13	17.53	12.33	19.81	17.05	40.84	66.49	0.82	0.69	0.60	0.50	1.04
Salinas MSA	283	0.79	21.84	0.00	16.71	2.53	19.49	10.13	41.97	87.34	0.66	0.00	0.00	0.31	0.82
San Diego-Carlsbad-San Marcos MSA	3,864	10.78	22.36	0.92	17.55	4.84	18.75	12.19	41.34	82.05	1.56	0.55	0.59	0.55	2.03
San Francisco (SF)-Redwood City-South SF MD 2012-2013	943	2.63	23.97	3.12	16.18	9.36	18.63	15.80	41.22	71.73	1.29	1.17	0.99	1.41	1.30
San Francisco (SF)-Redwood City-South SF MD 2014-2015	470	1.31	23.72	0.28	16.23	1.96	18.15	9.78	41.91	87.99	2.07	0.00	0.97	1.91	2.14
San Jose-Sunnyvale-Santa Clara MSA	2,364	6.60	23.41	1.44	16.16	5.62	19.35	12.95	41.08	80.00	2.45	0.47	0.89	0.94	3.10
San Luis Obispo-Paso Robles-Arroyo Grande MSA	390	1.09	19.80	1.10	18.20	5.49	21.60	18.13	40.40	75.27	1.36	0.00	0.00	0.53	1.91
San Rafael MD 2014-2015	98	0.27	22.40	0.00	16.40	1.54	20.36	9.23	40.84	89.23	1.37	0.00	0.45	1.14	1.57
Santa Cruz-Watsonville MSA	282	0.79	23.85	1.97	16.93	5.26	18.29	8.55	40.92	84.21	1.68	0.00	0.00	0.38	2.36
Santa Maria-Santa Barbara MSA	434	1.21	21.72	1.15	17.79	5.75	18.61	6.90	41.88	86.21	0.53	1.37	0.18	0.21	0.72
Santa Rosa MSA	402	1.12	20.14	1.64	18.47	8.20	20.77	9.84	40.62	80.33	0.94	0.00	0.00	0.47	1.21
Stockton-Lodi MSA	831	2.32	22.05	4.58	17.73	5.23	19.13	9.80	41.09	80.39	0.83	0.00	0.27	0.27	1.25
Vallejo-Fairfield MSA	377	1.05	19.90	3.23	17.71	16.94	22.56	25.00	39.83	54.84	0.98	1.67	0.63	1.08	1.01
Yuba City MSA	219	0.61	21.41	9.76	17.29	17.07	20.30	31.71	40.99	41.46	0.52	0.00	0.00	0.17	0.96
CA NonMSA Total	622	1.74	21.31	5.70	18.15	15.91	19.95	15.91	40.60	62.47	1.55	3.51	1.55	1.18	1.61

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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-Long Beach-Glendale MD	1,318	22.01	24.05	3.45	16.43	9.93	17.64	17.53	41.88	69.08	3.51	3.16	3.16	2.26	3.88
Sacramento-Arden Arcade-Roseville MSA	482	8.05	22.01	7.84	17.00	17.86	19.98	22.88	41.01	51.42	3.51	4.82	4.80	2.56	3.46
Limited Review:															
Anaheim-Santa Ana-Irvine MD	504	8.42	22.02	6.25	17.33	12.27	19.49	18.29	41.16	63.19	3.81	3.70	2.15	3.08	4.46
Bakersfield MSA	41	0.68	23.03	0.00	17.18	15.63	17.96	18.75	41.83	65.63	1.05	0.00	1.32	1.20	1.04
Chico MSA	71	1.19	22.10	5.80	17.16	21.74	19.36	31.88	41.38	40.58	12.50	11.76	28.57	13.04	8.26
Modesto MSA	75	1.25	22.58	7.25	16.69	14.49	19.60	23.19	41.12	55.07	3.80	3.23	5.56	1.05	4.57
Napa MSA	26	0.43	21.89	8.33	16.70	20.83	20.35	16.67	41.06	54.17	2.37	0.00	3.45	1.82	2.54
Oakland-Haywood-Berkeley MD	445	7.43	23.31	9.04	16.42	16.02	19.15	17.05	41.12	57.88	2.98	5.42	2.78	1.70	3.35
Oxnard-Thousand Oaks-Ventura MSA	122	2.04	21.43	6.98	17.35	11.63	20.51	26.74	40.71	54.65	1.95	1.43	1.99	1.81	2.07
Redding MSA	73	1.22	22.67	4.17	18.03	12.50	19.08	36.11	40.22	47.22	10.40	0.00	7.41	21.28	7.38
Riverside-San Bernardino-Ontario MSA	898	15.00	21.83	8.90	17.53	17.21	19.81	20.82	40.84	53.07	4.50	3.79	5.50	4.89	4.24
Salinas MSA	27	0.45	21.84	0.00	16.71	10.53	19.49	0.00	41.97	89.47	1.21	0.00	0.00	0.00	2.03
San Diego-Carlsbad-San Marcos MSA	556	9.29	22.36	6.37	17.55	10.40	18.75	20.38	41.34	62.85	3.41	1.89	3.39	2.80	3.92
San Francisco (SF)-Redwood City-South SF MD 2012-2013	213	3.56	23.97	8.04	16.18	18.09	18.63	22.61	41.22	51.26	5.43	8.11	5.32	4.65	5.48
San Francisco (SF)-Redwood City-South SF MD 2014-2015	213	3.56	23.72	4.88	16.23	10.24	18.15	16.10	41.91	68.78	5.26	4.84	6.38	4.55	5.31
San Jose-Sunnyvale-Santa Clara MSA	329	5.49	23.41	4.73	16.16	9.12	19.35	19.59	41.08	66.55	4.06	3.08	1.92	4.14	4.58
San Luis Obispo-Paso Robles-Arroyo Grande MSA	49	0.82	19.80	7.32	18.20	9.76	21.60	31.71	40.40	51.22	2.41	4.55	0.00	4.03	2.10
San Rafael MD 2014-2015	31	0.52	22.40	0.00	16.40	3.33	20.36	26.67	40.84	70.00	3.68	0.00	1.45	4.24	4.18
Santa Cruz-Watsonville MSA	63	1.05	23.85	6.67	16.93	10.00	18.29	25.00	40.92	58.33	1.98	0.00	0.00	2.25	2.60
Santa Maria-Santa Barbara MSA	29	0.48	21.72	11.11	17.79	5.56	18.61	11.11	41.88	72.22	1.20	3.57	0.00	1.92	0.85
Santa Rosa MSA	88	1.47	20.14	14.67	18.47	16.00	20.77	24.00	40.62	45.33	3.45	14.29	3.75	3.92	2.67
Stockton-Lodi MSA	63	1.05	22.05	5.08	17.73	11.86	19.13	23.73	41.09	59.32	2.13	0.00	3.31	1.40	2.30
Vallejo-Fairfield MSA	66	1.10	19.90	7.94	17.71	22.22	22.56	23.81	39.83	46.03	2.96	2.56	3.88	2.74	2.83
Yuba City MSA	23	0.38	21.41	0.00	17.29	9.09	20.30	45.45	40.99	45.45	4.98	0.00	4.76	8.00	4.35
CA NonMSA Total	183	3.06	21.31	7.18	18.15	16.57	19.95	25.97	40.60	50.28	10.06	20.00	7.79	14.09	8.31

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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-Long Beach-Glendale MD	13,833	19.68	24.05	4.18	16.43	8.59	17.64	14.45	41.88	72.78	1.53	1.34	1.16	0.96	1.71
Sacramento-Arden Arcade-Roseville MSA	4,813	6.85	22.01	9.11	17.00	15.75	19.98	22.99	41.01	52.15	1.85	2.34	1.66	1.68	1.93
Limited Review:															
Anaheim-Santa Ana-Irvine MD	6,656	9.47	22.02	6.33	17.33	11.70	19.49	19.18	41.16	62.80	1.80	1.70	1.12	1.16	2.17
Bakersfield MSA	570	0.81	23.03	4.53	17.18	10.27	17.96	20.54	41.83	64.65	0.68	1.07	0.41	0.84	0.64
Chico MSA	445	0.63	22.10	5.66	17.16	17.99	19.36	23.39	41.38	52.96	3.34	3.57	4.70	3.52	2.98
Modesto MSA	603	0.86	22.58	8.60	16.69	14.91	19.60	20.65	41.12	55.83	1.25	1.61	1.20	1.39	1.18
Napa MSA	340	0.48	21.89	7.05	16.70	14.94	20.35	22.82	41.06	55.19	2.02	3.42	1.19	1.19	2.47
Oakland-Haywood-Berkeley MD	7,429	10.57	23.31	6.58	16.42	12.29	19.15	19.04	41.12	62.09	2.02	1.47	1.18	1.27	2.52
Oxnard-Thousand Oaks-Ventura MSA	1,932	2.75	21.43	6.06	17.35	13.18	20.51	21.70	40.71	59.05	1.20	0.45	0.74	0.85	1.53
Redding MSA	432	0.61	22.67	7.53	18.03	16.36	19.08	22.34	40.22	53.77	3.06	2.46	2.85	3.43	3.03
Riverside-San Bernardino-Ontario MSA	7,144	10.16	21.83	8.12	17.53	16.60	19.81	22.11	40.84	53.18	1.55	2.43	1.73	1.32	1.54
Salinas MSA	469	0.67	21.84	3.48	16.71	7.83	19.49	16.96	41.97	71.74	0.97	0.00	0.41	0.88	1.12
San Diego-Carlsbad-San Marcos MSA	7,789	11.08	22.36	4.71	17.55	10.23	18.75	17.67	41.34	67.39	1.80	1.79	1.21	1.16	2.07
San Francisco (SF)-Redwood City-South SF MD 2012-2013	4,499	6.40	23.97	6.05	16.18	15.24	18.63	22.87	41.22	55.84	2.31	2.19	2.53	2.40	2.24
San Francisco (SF)-Redwood City-South SF MD 2014-2015	1,179	1.68	23.72	1.72	16.23	6.70	18.15	15.50	41.91	76.08	2.69	0.93	1.82	2.47	2.91
San Jose-Sunnyvale-Santa Clara MSA	6,063	8.62	23.41	4.15	16.16	7.81	19.35	18.58	41.08	69.45	2.23	1.41	1.19	1.73	2.62
San Luis Obispo-Paso Robles-Arroyo Grande MSA	663	0.94	19.80	7.80	18.20	12.43	21.60	18.50	40.40	61.27	1.08	0.52	0.97	0.78	1.27
San Rafael MD 2014-2015	239	0.34	22.40	1.43	16.40	7.62	20.36	20.48	40.84	70.48	2.63	1.04	1.97	2.92	2.81
Santa Cruz-Watsonville MSA	633	0.90	23.85	4.28	16.93	12.59	18.29	15.68	40.92	67.46	1.85	0.55	0.72	0.84	2.53
Santa Maria-Santa Barbara MSA	577	0.82	21.72	2.73	17.79	9.56	18.61	20.14	41.88	67.58	0.85	0.00	0.69	0.64	1.02
Santa Rosa MSA	944	1.34	20.14	7.63	18.47	15.57	20.77	22.44	40.62	54.35	1.14	0.95	0.68	1.00	1.30
Stockton-Lodi MSA	598	0.85	22.05	7.32	17.73	14.63	19.13	22.84	41.09	55.21	0.88	1.46	1.06	0.71	0.87
Vallejo-Fairfield MSA	748	1.06	19.90	9.68	17.71	21.13	22.56	24.82	39.83	44.37	1.54	0.85	2.04	1.37	1.53
Yuba City MSA	153	0.22	21.41	5.93	17.29	16.10	20.30	25.42	40.99	52.54	0.82	1.05	0.00	0.97	0.95
CA NonMSA Total	1,551	2.21	21.31	6.70	18.15	15.99	19.95	22.48	40.60	54.83	3.81	4.80	5.45	3.97	3.36

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF CALIFORNIA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Los Angeles-Long Beach-Glendale MD	52,643	27.71	78.08	58.67	97.18	1.06	1.76	5.75	6.05
Sacramento-Arden Arcade-Roseville MSA	15,062	7.93	80.20	58.40	95.53	2.12	2.34	9.10	9.50
Limited Review:									
Anaheim-Santa Ana-Irvine MD	19,740	10.39	78.56	59.36	96.44	1.41	2.15	5.43	5.81
Bakersfield MSA	1,526	0.80	78.55	51.18	95.87	1.38	2.75	3.44	3.79
Chico MSA	1,971	1.04	80.11	55.71	96.25	1.62	2.13	10.27	11.44
Modesto MSA	1,877	0.99	78.61	55.41	95.21	1.44	3.36	6.40	6.55
Napa MSA	1,349	0.71	79.96	61.75	98.37	0.52	1.11	9.77	11.27
Oakland-Haywood-Berkeley MD	15,601	8.21	78.61	65.12	96.46	1.42	2.12	6.35	7.57
Oxnard-Thousand Oaks-Ventura MSA	3,153	1.66	80.98	63.30	98.07	0.86	1.08	4.87	5.81
Redding MSA	1,557	0.82	80.56	63.20	97.37	1.41	1.22	13.38	15.34
Riverside-San Bernardino-Ontario MSA	16,116	8.48	79.93	61.99	96.79	1.30	1.90	6.41	7.17
Salinas MSA	1,014	0.53	78.58	52.27	97.34	1.68	0.99	4.55	4.97
San Diego-Carlsbad-San Marcos MSA	19,254	10.13	80.26	61.17	95.97	1.59	2.44	6.59	7.50
San Francisco (SF)-Redwood City-South SF MD 2012-2013	5,749	3.03	71.98	62.67	95.95	1.27	2.78	5.54	6.49
San Francisco (SF)-Redwood City-South SF MD 2014-2015	5,194	2.73	76.70	61.47	96.44	1.58	1.98	4.40	5.53
San Jose-Sunnyvale-Santa Clara MSA	8,611	4.53	79.17	60.96	95.99	1.41	2.60	4.83	5.51
San Luis Obispo-Paso Robles-Arroyo Grande MSA	1,054	0.55	81.40	57.59	96.20	1.61	2.18	4.91	5.73
San Rafael MD 2014-2015	1,760	0.93	82.93	62.78	97.33	0.91	1.76	8.95	10.47
Santa Cruz-Watsonville MSA	1,515	0.80	82.74	66.86	98.48	0.92	0.59	7.19	8.32
Santa Maria-Santa Barbara MSA	1,123	0.59	78.17	61.18	98.31	0.62	1.07	4.30	5.47
Santa Rosa MSA	4,251	2.24	81.29	63.94	96.73	1.20	2.07	10.28	12.11
Stockton-Lodi MSA	1,407	0.74	77.22	56.08	96.59	1.63	1.78	3.77	3.75
Vallejo-Fairfield MSA	1,709	0.90	80.34	65.07	97.07	1.17	1.76	8.12	9.39
Yuba City MSA	961	0.51	79.47	55.25	97.40	0.94	1.66	9.42	10.44
CA NonMSA Total	5,812	3.06	79.39	60.25	96.89	1.62	1.50	13.94	15.82

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF CALIFORNIA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Los Angeles-Long Beach-Glendale MD	124	6.97	93.76	60.48	97.58	0.81	1.61	16.23	23.23
Sacramento-Arden Arcade-Roseville MSA	147	8.26	94.81	60.54	93.88	3.40	2.72	11.44	11.20
Limited Review:									
Anaheim-Santa Ana-Irvine MD	50	2.81	92.76	56.00	100.00	0.00	0.00	20.59	27.66
Bakersfield MSA	36	2.02	87.99	38.89	100.00	0.00	0.00	5.15	3.66
Chico MSA	86	4.83	94.91	62.79	98.84	1.16	0.00	18.13	21.36
Modesto MSA	98	5.51	92.15	60.20	96.94	1.02	2.04	7.23	6.61
Napa MSA	44	2.47	92.42	65.91	100.00	0.00	0.00	11.20	11.29
Oakland-Haywood-Berkeley MD	56	3.15	94.33	67.86	100.00	0.00	0.00	18.12	21.95
Oxnard-Thousand Oaks-Ventura MSA	39	2.19	90.31	25.64	92.31	7.69	0.00	11.60	16.67
Redding MSA	18	1.01	95.22	55.56	100.00	0.00	0.00	13.16	9.09
Riverside-San Bernardino-Ontario MSA	109	6.13	93.47	53.21	100.00	0.00	0.00	17.96	21.01
Salinas MSA	26	1.46	83.88	26.92	96.15	3.85	0.00	7.93	12.28
San Diego-Carlsbad-San Marcos MSA	122	6.86	94.71	62.30	100.00	0.00	0.00	24.60	25.18
San Francisco (SF)-Redwood City-South SF MD 2012-2013	10	0.56	95.47	90.00	100.00	0.00	0.00	8.20	12.50
San Francisco (SF)-Redwood City-South SF MD 2014-2015	25	1.41	94.16	52.00	96.00	0.00	4.00	15.29	18.42
San Jose-Sunnyvale-Santa Clara MSA	18	1.01	93.24	72.22	100.00	0.00	0.00	6.86	10.64
San Luis Obispo-Paso Robles-Arroyo Grande MSA	38	2.14	95.62	68.42	94.74	0.00	5.26	8.52	12.12
San Rafael MD 2014-2015	15	0.84	95.92	53.33	100.00	0.00	0.00	4.35	8.00
Santa Cruz-Watsonville MSA	40	2.25	92.23	60.00	100.00	0.00	0.00	12.16	7.89
Santa Maria-Santa Barbara MSA	32	1.80	90.40	46.88	100.00	0.00	0.00	10.53	8.33
Santa Rosa MSA	111	6.24	94.41	66.67	100.00	0.00	0.00	16.89	19.51
Stockton-Lodi MSA	38	2.14	91.89	31.58	100.00	0.00	0.00	2.35	2.58
Vallejo-Fairfield MSA	24	1.35	94.99	83.33	100.00	0.00	0.00	23.64	37.50
Yuba City MSA	94	5.28	93.01	60.64	94.68	2.13	3.19	15.58	19.35
CA NonMSA Total	379	21.30	95.55	61.74	96.04	1.85	2.11	21.38	20.53

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF CALIFORNIA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Los Angeles-Long Beach-Glendale MD	90	82,702	1,119	279,991	1,209	362,693	19.43	8	4,747
Sacramento-Arden Arcade-Roseville MSA	131	63,005	381	94,537	512	157,542	8.44	0	0
Limited Review:									
Anaheim-Santa Ana-Irvine MD	60	55,222	363	59,492	423	114,714	6.15	1	1
Bakersfield MSA	15	16,840	77	59,189	92	76,029	4.07	2	128,904
Chico MSA	14	2,885	35	2,135	49	5,020	0.27	0	0
Modesto MSA	29	3,062	51	2,515	80	5,577	0.30	0	0
Napa MSA	7	1,009	8	1,414	15	2,423	0.13	0	0
Oakland-Haywood-Berkeley MD	87	55,712	300	71,429	387	127,141	6.81	1	13
Oxnard-Thousand Oaks-Ventura MSA	22	7,971	68	26,811	90	34,782	1.86	0	0
Redding MSA	24	2,951	56	13,348	80	16,299	0.87	0	0
Riverside-San Bernardino-Ontario MSA	55	56,133	385	163,313	440	219,446	11.76	0	0
Salinas MSA	15	11,194	46	34,723	61	45,917	2.46	0	0
San Diego-Carlsbad-San Marcos MSA	70	29,502	675	226,890	745	256,392	13.73	1	35
San Francisco (SF)-Redwood City-South SF MD 2012-2013	114	76,288	228	49,103	342	125,391	6.72	7	815
San Francisco (SF)-Redwood City-South SF MD 2014-2015	56	38,467	177	37,303	233	75,770	4.06	2	66
San Jose-Sunnyvale-Santa Clara MSA	13	15,371	112	47,771	125	63,142	3.38	0	0
San Luis Obispo-Paso Robles-Arroyo Grande MSA	13	2,765	10	2,659	23	5,424	0.29	0	0
San Rafael MD 2014-2015	3	1,272	10	6,056	13	7,328	0.39	0	0
Santa Cruz-Watsonville MSA	12	5,209	14	8,827	26	14,036	0.75	1	5
Santa Maria-Santa Barbara MSA	11	2,449	32	5,949	43	8,398	0.45	0	0
Santa Rosa MSA	19	19,810	19	2,340	38	22,150	1.19	0	0
Stockton-Lodi MSA	25	3,210	52	28,405	77	31,615	1.69	0	0
Vallejo-Fairfield MSA	36	4,565	15	2,249	51	6,814	0.37	0	0
Yuba City MSA	19	2,551	15	882	34	3,433	0.18	0	0
CA NonMSA Total	149	25,031	113	31,954	262	56,985	3.05	2	2,406
Statewide:									
Qualified Investments That Serve AAs	12	11,869	110	10,436	122	22,305	1.19	0	0
Qualified Investments Outside AAs	2	4,440	64	55,107	66	59,547	NA	3	5,404

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF CALIFORNIA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Los Angeles-Long Beach-Glendale MD	22.99	140	21.71	5.71	15.71	23.57	55.00	7	17	0	-2	-1	-7	8.01	29.43	28.26	33.92
Sacramento-Arden Arcade-Roseville MSA	22.43	52	8.06	9.62	17.31	42.31	30.77	3	2	-1	0	0	2	7.15	23.70	37.93	30.90
Limited Review:																	
Anaheim-Santa Ana-Irvine MD	10.77	72	11.16	4.17	20.83	29.17	44.44	0	6	0	-1	-4	-1	6.49	29.75	31.47	32.28
Bakersfield MSA	0.07	1	0.16	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.38	32.56	28.83	33.16
Chico MSA	0.56	5	0.78	0.00	60.00	20.00	20.00	0	0	0	0	0	0	1.92	25.19	48.53	24.36
Modesto MSA	0.55	5	0.78	0.00	20.00	40.00	40.00	0	0	0	0	0	0	3.01	19.75	44.49	32.74
Napa MSA	0.27	4	0.62	0.00	75.00	25.00	0.00	0	0	0	0	0	0	0.00	30.12	40.98	28.01
Oakland-Haywood-Berkeley MD	6.42	52	8.06	3.85	21.15	38.46	36.54	1	3	0	1	-2	-1	12.53	20.80	34.45	32.23
Oxnard-Thousand Oaks-Ventura MSA	0.94	16	2.48	0.00	12.50	68.75	18.75	0	2	0	0	-2	0	5.38	26.09	40.80	27.72
Redding MSA	0.61	6	0.93	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	26.93	51.36	21.70
Riverside-San Bernardino-Ontario MSA	7.95	85	13.18	2.35	17.65	30.59	49.41	7	7	0	1	0	-1	5.71	26.45	35.43	32.09
Salinas MSA	0.05	2	0.31	0.00	50.00	50.00	0.00	0	0	0	0	0	0	5.97	26.06	38.13	27.01
San Diego-Carlsbad-San Marcos MSA	10.44	73	11.32	2.74	24.66	36.99	35.62	2	8	0	-1	-1	-4	9.80	21.57	35.24	33.05
San Francisco (SF)-Redwood City-South SF MD 2012-2013	3.25	35	NA	20.00	14.29	40.00	25.71	0	0	0	0	0	0	11.07	19.31	37.59	31.74
San Francisco (SF)-Redwood City-South SF MD 2014-2015	2.93	29	4.50	20.69	6.90	48.28	24.14	1	1	-1	0	1	0	10.76	18.22	39.96	31.05
San Jose-Sunnyvale-Santa Clara MSA	4.01	32	4.96	0.00	9.38	50.00	40.63	5	3	0	1	3	-2	9.22	24.43	36.92	29.26
San Luis Obispo-Paso Robles-Arroyo Grande MSA	0.32	6	0.93	0.00	16.67	66.67	16.67	0	0	0	0	0	0	0.48	8.16	63.95	24.62
San Rafael MD 2014-2015	0.32	6	0.93	0.00	33.33	50.00	16.67	0	0	0	0	0	0	4.76	17.32	53.03	22.96
Santa Cruz-Watsonville MSA	0.38	6	0.93	0.00	16.67	50.00	33.33	0	0	0	0	0	0	2.56	34.19	34.41	28.83
Santa Maria-Santa Barbara MSA	0.16	3	0.47	33.33	0.00	33.33	33.33	0	0	0	0	0	0	10.48	25.09	31.38	33.05
Santa Rosa MSA	0.72	10	1.55	10.00	30.00	60.00	0.00	0	0	0	0	0	0	0.43	24.20	55.15	20.22
Stockton-Lodi MSA	0.39	7	1.09	0.00	14.29	28.57	57.14	0	0	0	0	0	0	5.71	26.08	32.39	35.83
Vallejo-Fairfield MSA	0.73	7	1.09	0.00	28.57	57.14	14.29	0	0	0	0	0	0	1.27	22.65	48.19	26.00
Yuba City MSA	0.24	1	0.16	0.00	100.00	0.00	0.00	0	0	0	0	0	0	2.02	28.10	36.24	33.65
CA NonMSA Total	2.50	25	3.88	0.00	28.00	64.00	8.00	0	0	0	0	0	0	0.28	17.93	61.47	19.79

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Los Angeles-Long Beach-Glendale MD	22.99	140	21.71	5.71	15.71	23.57	55.00	153	21.31	5.23	15.03	24.18	55.56	8.01	29.43	28.26	33.92
Sacramento-Arden Arcade-Roseville MSA	22.43	52	8.06	9.62	17.31	42.31	30.77	59	8.22	8.47	16.95	40.68	33.90	7.15	23.70	37.93	30.90
Limited Review:																	
Anaheim-Santa Ana-Irvine MD	10.77	72	11.16	4.17	20.83	29.17	44.44	73	10.17	4.11	20.55	31.51	42.47	6.49	29.75	31.47	32.28
Bakersfield MSA	0.07	1	0.16	0.00	0.00	0.00	100.00	4	0.56	0.00	0.00	25.00	75.00	3.38	32.56	28.83	33.16
Chico MSA	0.56	5	0.78	0.00	60.00	20.00	20.00	7	0.97	0.00	71.43	14.29	14.29	1.92	25.19	48.53	24.36
Modesto MSA	0.55	5	0.78	0.00	20.00	40.00	40.00	5	0.70	0.00	20.00	40.00	40.00	3.01	19.75	44.49	32.74
Napa MSA	0.27	4	0.62	0.00	75.00	25.00	0.00	4	0.56	0.00	75.00	25.00	0.00	0.00	30.12	40.98	28.01
Oakland-Haywood-Berkeley MD	6.42	52	8.06	3.85	21.15	38.46	36.54	54	7.52	5.56	18.52	35.19	40.74	12.53	20.80	34.45	32.23
Oxnard-Thousand Oaks-Ventura MSA	0.94	16	2.48	0.00	12.50	68.75	18.75	16	2.23	0.00	12.50	68.75	18.75	5.38	26.09	40.80	27.72
Redding MSA	0.61	6	0.93	0.00	50.00	50.00	0.00	8	1.11	0.00	50.00	50.00	0.00	0.00	26.93	51.36	21.70
Riverside-San Bernardino-Ontario MSA	7.95	85	13.18	2.35	17.65	30.59	49.41	94	13.09	2.13	17.02	32.98	47.87	5.71	26.45	35.43	32.09
Salinas MSA	0.05	2	0.31	0.00	50.00	50.00	0.00	2	0.28	0.00	50.00	50.00	0.00	5.97	26.06	38.13	27.01
San Diego-Carlsbad-San Marcos MSA	10.44	73	11.32	2.74	24.66	36.99	35.62	77	10.72	2.60	25.97	33.77	37.66	9.80	21.57	35.24	33.05
San Francisco (SF)-Redwood City-South SF MD 2012-2013	3.25	35	NA	20.00	14.29	40.00	25.71	47	NA	19.15	12.77	46.81	21.28	11.07	19.31	37.59	31.74
San Francisco (SF)-Redwood City-South SF MD 2014-2015	2.93	29	4.50	20.69	6.90	48.28	24.14	31	4.32	19.35	6.45	48.39	25.81	10.76	18.22	39.96	31.05
San Jose-Sunnyvale-Santa Clara MSA	4.01	32	4.96	0.00	9.38	50.00	40.63	56	7.80	5.36	30.36	39.29	25.00	9.22	24.43	36.92	29.26
San Luis Obispo-Paso Robles-Arroyo Grande MSA	0.32	6	0.93	0.00	16.67	66.67	16.67	5	0.70	0.00	0.00	80.00	20.00	0.48	8.16	63.95	24.62
San Rafael MD 2014-2015	0.32	6	0.93	0.00	33.33	50.00	16.67	8	1.11	0.00	25.00	50.00	25.00	4.76	17.32	53.03	22.96
Santa Cruz-Watsonville MSA	0.38	6	0.93	0.00	16.67	50.00	33.33	6	0.84	0.00	16.67	50.00	33.33	2.56	34.19	34.41	28.83
Santa Maria-Santa Barbara MSA	0.16	3	0.47	33.33	0.00	33.33	33.33	3	0.42	33.33	0.00	33.33	33.33	10.48	25.09	31.38	33.04
Santa Rosa MSA	0.72	10	1.55	10.00	30.00	60.00	0.00	10	1.39	10.00	30.00	60.00	0.00	0.43	24.20	55.15	20.22
Stockton-Lodi MSA	0.39	7	1.09	0.00	14.29	28.57	57.14	7	0.97	0.00	14.29	28.57	57.14	5.71	26.08	32.39	35.83
Vallejo-Fairfield MSA	0.73	7	1.09	0.00	28.57	57.14	14.29	8	1.11	0.00	25.00	50.00	25.00	1.27	22.65	48.19	26.00
Yuba City MSA	0.24	1	0.16	0.00	100.00	0.00	0.00	2	0.28	0.00	100.00	0.00	0.00	2.02	28.10	36.24	33.65
CA NonMSA Total	2.50	25	3.88	0.00	28.00	64.00	8.00	26	3.62	0.00	26.92	65.38	7.69	0.28	17.93	61.47	19.79

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF COLORADO												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Denver-Aurora-Lakewood MSA	59.52	29,803	7,013,202	36,235	764,106	167	2,293	42	335,485	66,247	8,115,086	75.72
Limited Review:												
Boulder MSA	5.63	2,206	614,468	4,030	74,953	24	331	7	51,828	6,267	741,580	3.74
Colorado Springs MSA	15.14	5,966	1,166,257	10,804	173,566	63	939	14	21,077	16,847	1,361,839	6.85
Fort Collins MSA	5.07	2,629	562,377	2,968	50,438	42	1,005	7	31,005	5,646	644,825	2.57
Grand Junction MSA	2.61	1,013	184,874	1,854	113,841	36	2,369	4	5,947	2,907	307,031	1.95
Greeley MSA	3.63	2,178	435,751	1,810	37,181	53	772	2	16,906	4,043	490,610	0.72
Pueblo MSA	2.52	1,191	149,405	1,604	37,176	10	504	5	8,540	2,810	195,625	2.47
CO NonMSA Total	5.88	2,623	800,600	3,822	130,647	80	1,609	15	11,187	6,540	944,043	5.97
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	5	1,897	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Denver-Aurora-Lakewood MSA	10,465	59.14	6.50	6.97	19.37	19.17	35.18	33.81	38.95	40.06	3.63	4.65	4.22	3.73	3.12
Limited Review:															
Boulder MSA	515	2.91	2.83	4.08	14.95	14.37	45.76	51.07	36.45	30.49	1.83	2.78	1.75	1.91	1.62
Colorado Springs MSA	2,977	16.82	2.51	3.56	21.90	23.24	42.99	48.37	32.59	24.82	5.45	9.16	8.21	5.67	3.47
Fort Collins MSA	896	5.06	1.01	0.33	18.16	18.19	50.04	50.00	30.79	31.47	2.74	0.00	2.31	3.36	2.16
Grand Junction MSA	480	2.71	0.00	0.00	12.74	12.29	60.15	70.00	27.11	17.71	6.98	0.00	7.71	7.79	4.00
Greeley MSA	1,041	5.88	5.36	3.55	16.10	14.02	47.84	49.86	30.69	32.56	3.92	5.86	4.28	4.99	2.38
Pueblo MSA	357	2.02	4.85	3.92	18.98	15.41	36.89	34.73	39.29	45.94	4.91	4.76	6.80	5.29	4.23
CO NonMSA Total	964	5.45	0.71	0.00	21.70	19.29	39.54	37.24	38.05	43.46	4.42	0.00	7.49	4.25	3.66

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Denver-Aurora-Lakewood MSA	1,051	62.34	6.50	3.52	19.37	16.18	35.18	33.21	38.95	47.10	5.27	3.53	4.57	4.61	6.41
Limited Review:															
Boulder MSA	64	3.80	2.83	3.13	14.95	15.63	45.76	54.69	36.45	26.56	2.17	0.00	2.70	3.32	0.63
Colorado Springs MSA	184	10.91	2.51	1.09	21.90	18.48	42.99	41.85	32.59	38.59	3.87	0.00	3.05	4.81	3.28
Fort Collins MSA	108	6.41	1.01	0.00	18.16	17.59	50.04	43.52	30.79	38.89	3.22	0.00	2.61	2.31	5.19
Grand Junction MSA	55	3.26	0.00	0.00	12.74	9.09	60.15	56.36	27.11	34.55	5.26	0.00	9.09	4.39	6.52
Greeley MSA	47	2.79	5.36	0.00	16.10	4.26	47.84	51.06	30.69	44.68	1.99	0.00	0.00	2.32	2.48
Pueblo MSA	56	3.32	4.85	1.79	18.98	16.07	36.89	39.29	39.29	42.86	4.37	11.11	5.56	5.19	2.94
CO NonMSA Total	121	7.18	0.71	0.00	21.70	17.36	39.54	42.98	38.05	39.67	8.78	0.00	6.94	12.77	6.63

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF COLORADO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Denver-Aurora-Lakewood MSA	18,270	64.84	6.50	4.31	19.37	14.20	35.18	31.19	38.95	50.30	3.47	4.23	3.73	3.08	3.61
Limited Review:															
Boulder MSA	1,624	5.76	2.83	2.09	14.95	12.19	45.76	45.81	36.45	39.90	2.34	2.58	2.86	2.21	2.27
Colorado Springs MSA	2,796	9.92	2.51	1.79	21.90	12.98	42.99	39.70	32.59	45.53	3.14	2.89	3.35	2.86	3.41
Fort Collins MSA	1,617	5.74	1.01	0.49	18.16	17.07	50.04	47.74	30.79	34.69	2.86	6.06	2.61	2.92	2.82
Grand Junction MSA	477	1.69	0.00	0.00	12.74	8.81	60.15	54.72	27.11	36.48	2.85	0.00	4.02	2.24	3.81
Greeley MSA	1,090	3.87	5.36	1.28	16.10	9.08	47.84	45.05	30.69	44.59	2.51	2.00	3.04	2.42	2.50
Pueblo MSA	772	2.74	4.85	2.20	18.98	8.29	36.89	33.94	39.29	55.57	7.30	7.25	8.11	7.20	7.21
CO NonMSA Total	1,532	5.44	0.71	0.33	21.70	15.54	39.54	32.38	38.05	51.76	4.67	18.18	5.33	4.78	4.38

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Denver-Aurora-Lakewood MSA	17	34.69	20.66	17.65	32.10	17.65	32.63	58.82	14.61	5.88	0.56	0.00	0.65	1.14	0.00
Limited Review:															
Boulder MSA	3	6.12	8.66	33.33	30.19	33.33	46.97	33.33	14.18	0.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs MSA	9	18.37	11.63	22.22	42.01	11.11	35.38	55.56	10.99	11.11	4.17	0.00	0.00	8.70	12.50
Fort Collins MSA	7	14.29	8.14	0.00	34.63	28.57	44.95	57.14	12.28	14.29	3.03	0.00	0.00	7.69	0.00
Grand Junction MSA	1	2.04	0.00	0.00	34.20	100.00	40.29	0.00	25.51	0.00	0.00	0.00	0.00	0.00	0.00
Greeley MSA	0	0.00	24.01	0.00	39.19	0.00	28.78	0.00	8.01	0.00	0.00	0.00	0.00	0.00	0.00
Pueblo MSA	6	12.24	19.35	0.00	36.32	0.00	35.89	100.00	8.44	0.00	5.26	0.00	0.00	14.29	0.00
CO NonMSA Total	6	12.24	0.58	0.00	6.68	50.00	36.68	0.00	56.06	50.00	4.17	0.00	0.00	0.00	11.11

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF COLORADO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver-Aurora-Lakewood MSA	36,119	57.32	8.44	9.56	20.23	20.23	30.31	29.93	40.70	40.28	13.72	13.90	13.18	14.51	13.51
Limited Review:															
Boulder MSA	4,030	6.40	3.80	3.85	22.21	21.64	42.36	43.03	31.63	31.49	10.10	10.59	10.01	10.04	10.18
Colorado Springs MSA	10,804	17.15	6.73	5.16	23.71	22.17	35.08	38.89	34.36	33.78	22.95	15.13	21.47	26.48	21.60
Fort Collins MSA	2,968	4.71	0.97	0.64	20.68	19.74	49.43	47.68	28.91	31.94	9.27	4.42	9.34	9.57	8.88
Grand Junction MSA	1,854	2.94	0.00	0.00	12.22	12.51	60.96	63.81	26.82	23.68	14.50	0.00	12.93	15.58	13.20
Greeley MSA	1,810	2.87	4.80	2.98	16.80	13.37	42.32	40.00	36.01	43.65	8.93	7.19	7.94	8.55	9.56
Pueblo MSA	1,604	2.55	5.50	3.43	26.51	20.95	30.55	30.74	37.08	44.89	22.39	13.33	17.52	24.07	25.29
CO NonMSA Total	3,822	6.07	0.47	0.52	15.12	10.70	35.03	31.71	49.36	57.06	11.15	33.33	11.02	11.26	11.25

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF COLORADO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Denver-Aurora-Lakewood MSA	167	35.16	7.24	1.20	18.39	11.38	32.78	23.95	41.51	63.47	26.44	30.00	46.15	18.95	28.35
Limited Review:															
Boulder MSA	24	5.05	3.73	0.00	16.19	20.83	47.92	41.67	32.16	37.50	16.42	0.00	42.86	17.86	11.11
Colorado Springs MSA	63	13.26	3.82	1.59	25.97	14.29	41.63	34.92	28.57	49.21	36.36	0.00	28.57	42.11	35.71
Fort Collins MSA	42	8.84	1.01	2.38	16.87	28.57	48.21	45.24	33.75	23.81	13.45	50.00	25.00	14.55	6.52
Grand Junction MSA	36	7.58	0.00	0.00	7.42	5.56	61.14	58.33	31.44	36.11	6.47	0.00	50.00	3.20	11.11
Greeley MSA	53	11.16	1.57	0.00	12.21	16.98	62.60	58.49	23.63	24.53	4.20	0.00	9.80	2.26	8.77
Pueblo MSA	10	2.11	4.04	0.00	19.95	50.00	37.37	20.00	37.88	30.00	9.38	0.00	66.67	4.55	0.00
CO NonMSA Total	80	16.84	0.11	0.00	25.66	23.75	42.80	46.25	31.43	30.00	10.03	0.00	7.69	6.71	22.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Denver-Aurora-Lakewood MSA	10,465	59.14	22.09	8.29	17.11	17.47	20.18	18.51	40.62	55.73	1.60	1.78	0.92	1.00	2.29
Limited Review:															
Boulder MSA	515	2.91	22.09	9.67	16.59	13.29	20.06	21.15	41.26	55.89	1.10	1.09	0.66	0.96	1.38
Colorado Springs MSA	2,977	16.82	20.07	15.70	18.25	24.15	21.61	19.32	40.08	40.82	0.86	1.24	0.88	0.49	1.06
Fort Collins MSA	896	5.06	20.17	8.86	17.62	18.23	22.26	25.32	39.94	47.59	1.26	0.86	0.88	1.16	1.57
Grand Junction MSA	480	2.71	19.34	4.96	17.84	21.49	24.11	23.14	38.71	50.41	1.13	0.57	1.24	1.12	1.16
Greeley MSA	1,041	5.88	20.99	5.88	17.16	21.36	21.57	24.46	40.28	48.30	0.94	0.97	0.75	0.60	1.32
Pueblo MSA	357	2.02	21.63	12.74	17.82	25.94	19.67	22.64	40.88	38.68	2.59	2.05	2.47	2.72	2.67
CO NonMSA Total	964	5.45	17.53	1.54	18.24	4.19	19.98	13.66	44.25	80.62	2.07	0.99	0.38	0.99	2.76

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Denver-Aurora-Lakewood MSA	1,051	62.34	22.09	10.62	17.11	14.51	20.18	24.92	40.62	49.95	5.33	3.81	3.11	4.53	7.20
Limited Review:															
Boulder MSA	64	3.80	22.09	11.48	16.59	13.11	20.06	21.31	41.26	54.10	2.29	2.86	1.20	3.45	1.98
Colorado Springs MSA	184	10.91	20.07	10.29	18.25	24.00	21.61	22.86	40.08	42.86	3.77	2.86	6.22	4.53	2.52
Fort Collins MSA	108	6.41	20.17	6.59	17.62	19.78	22.26	29.67	39.94	43.96	2.96	0.00	0.72	4.35	3.68
Grand Junction MSA	55	3.26	19.34	23.53	17.84	17.65	24.11	17.65	38.71	41.18	5.10	20.00	0.00	5.56	4.35
Greeley MSA	47	2.79	20.99	7.14	17.16	14.29	21.57	23.81	40.28	54.76	2.14	0.00	0.92	1.65	3.26
Pueblo MSA	56	3.32	21.63	9.09	17.82	21.82	19.67	25.45	40.88	43.64	4.64	0.00	3.57	8.51	3.70
CO NonMSA Total	121	7.18	17.53	7.34	18.24	18.35	19.98	21.10	44.25	53.21	9.17	4.00	14.89	6.10	9.71

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Denver-Aurora-Lakewood MSA	18,270	64.84	22.09	9.09	17.11	19.20	20.18	24.37	40.62	47.34	3.79	4.71	3.60	3.39	3.99
Limited Review:															
Boulder MSA	1,624	5.76	22.09	10.19	16.59	19.78	20.06	24.19	41.26	45.84	2.37	1.84	1.91	2.32	2.77
Colorado Springs MSA	2,796	9.92	20.07	9.45	18.25	18.28	21.61	24.17	40.08	48.10	3.91	3.33	4.27	3.58	4.08
Fort Collins MSA	1,618	5.74	20.17	9.12	17.62	20.91	22.26	26.16	39.94	43.80	2.89	3.30	1.71	2.73	3.63
Grand Junction MSA	477	1.69	19.34	10.06	17.84	19.83	24.11	19.27	38.71	50.84	3.36	3.79	4.31	2.30	3.46
Greeley MSA	1,090	3.87	20.99	6.76	17.16	15.31	21.57	29.08	40.28	48.85	2.67	2.12	2.51	3.01	2.59
Pueblo MSA	772	2.74	21.63	4.76	17.82	16.13	19.67	25.50	40.88	53.61	9.33	5.32	8.95	12.17	8.39
CO NonMSA Total	1,532	5.44	17.53	5.51	18.24	9.63	19.98	18.02	44.25	66.83	4.51	7.25	1.87	4.72	4.69

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF COLORADO									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Denver-Aurora-Lakewood MSA	36,235	57.40	80.67	59.32	97.22	1.12	1.66	13.72	15.42
Limited Review:									
Boulder MSA	4,030	6.38	81.48	60.40	97.44	1.12	1.44	10.10	12.11
Colorado Springs MSA	10,804	17.11	82.21	73.93	98.44	0.61	0.95	22.95	31.43
Fort Collins MSA	2,968	4.70	82.84	57.41	97.98	0.81	1.21	9.27	11.03
Grand Junction MSA	1,854	2.94	81.15	52.97	86.89	5.93	7.17	14.50	16.32
Greeley MSA	1,810	2.87	82.66	59.72	97.07	1.27	1.66	8.93	10.34
Pueblo MSA	1,604	2.54	80.31	62.34	96.01	1.81	2.18	22.39	29.51
CO NonMSA Total	3,822	6.05	78.32	52.83	93.38	3.43	3.19	11.15	11.10

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF COLORADO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Denver-Aurora-Lakewood MSA	167	35.16	95.42	65.27	98.20	1.80	0.00	26.44	33.33
Limited Review:									
Boulder MSA	24	5.05	96.38	87.50	95.83	4.17	0.00	16.42	27.50
Colorado Springs MSA	63	13.26	96.94	84.13	98.41	1.59	0.00	36.36	48.65
Fort Collins MSA	42	8.84	97.28	73.81	100.00	0.00	0.00	13.45	12.99
Grand Junction MSA	36	7.58	98.89	61.11	75.00	22.22	2.78	6.47	5.80
Greeley MSA	53	11.16	94.78	69.81	96.23	3.77	0.00	4.20	5.53
Pueblo MSA	10	2.11	97.47	50.00	90.00	0.00	10.00	9.38	4.76
CO NonMSA Total	80	16.84	97.20	57.50	93.75	5.00	1.25	10.03	8.05

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF COLORADO Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Denver-Aurora-Lakewood MSA	36	37,603	443	158,288	479	195,891	72.89	1	40
Limited Review:									
Boulder MSA	16	3,289	57	4,976	73	8,265	3.08	0	0
Colorado Springs MSA	46	3,761	104	9,269	150	13,030	4.85	0	0
Fort Collins MSA	8	1,729	72	17,953	80	19,682	7.32	0	0
Grand Junction MSA	8	1,475	68	2,005	76	3,480	1.29	0	0
Greeley MSA	8	637	48	9,502	56	10,139	3.77	0	0
Pueblo MSA	15	1,095	37	2,553	52	3,648	1.36	0	0
CO NonMSA Total	25	5,586	118	7,664	143	13,250	4.93	0	0
Statewide:									
Qualified Investments That Serve AAs	4	1,200	29	182	33	1,382	0.51	0	0
Qualified Investments Outside AAs	0	0	0	0	0	0	NA	0	0

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF COLORADO																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Denver-Aurora-Lakewood MSA	75.72	82	53.59	7.32	20.73	30.49	40.24	5	2	1	0	2	-1	11.39	23.34	32.64	32.59
Limited Review:																	
Boulder MSA	3.74	10	6.54	0.00	20.00	50.00	30.00	1	0	0	0	0	1	6.89	18.39	45.80	28.91
Colorado Springs MSA	6.85	15	9.80	6.67	26.67	40.00	26.67	0	1	0	-1	0	0	4.44	26.96	40.33	27.54
Fort Collins MSA	2.57	10	6.54	0.00	20.00	60.00	20.00	0	0	0	0	0	0	2.64	22.37	48.27	26.69
Grand Junction MSA	1.95	4	2.61	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	17.15	60.53	22.32
Greeley MSA	0.72	5	3.27	0.00	0.00	40.00	60.00	0	0	0	0	0	0	9.68	19.79	43.99	25.80
Pueblo MSA	2.47	6	3.92	0.00	16.67	33.33	50.00	0	0	0	0	0	0	7.79	23.43	35.03	32.43
CO NonMSA Total	5.97	21	13.73	0.00	14.29	33.33	52.38	0	0	0	0	0	0	0.87	19.20	38.52	38.89

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography:																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Denver-Aurora-Lakewood MSA	75.72	82	53.59	7.32	20.73	30.49	40.24	138	58.97	13.04	21.01	31.88	33.33	11.39	23.34	32.64	32.59
Limited Review:																	
Boulder MSA	3.74	10	6.54	0.00	20.00	50.00	30.00	15	6.41	6.67	33.33	33.33	26.67	6.89	18.39	45.80	28.91
Colorado Springs MSA	6.85	15	9.80	6.67	26.67	40.00	26.67	20	8.55	15.00	35.00	30.00	20.00	4.44	26.96	40.33	27.54
Fort Collins MSA	2.57	10	6.54	0.00	20.00	60.00	20.00	13	5.56	0.00	15.38	61.54	23.08	2.64	22.37	48.27	26.69
Grand Junction MSA	1.95	4	2.61	0.00	0.00	100.00	0.00	8	3.42	0.00	0.00	100.00	0.00	0.00	17.15	60.53	22.32
Greeley MSA	0.72	5	3.27	0.00	0.00	40.00	60.00	7	2.99	14.29	0.00	28.57	57.14	9.68	19.79	43.99	25.80
Pueblo MSA	2.47	6	3.92	0.00	16.67	33.33	50.00	10	4.27	10.00	10.00	50.00	30.00	7.79	23.43	35.03	32.43
CO NonMSA Total	5.97	21	13.73	0.00	14.29	33.33	52.38	23	9.83	0.00	13.04	34.78	52.17	0.87	19.20	38.52	38.89

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF FLORIDA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
West Palm Beach-Boca Raton-Delray Beach MD	71.67	1,668	413,349	2,007	36,074	6	70	0	0	3,681	449,493	75.24
Limited Review:												
Naples-Immokalee-Marco Island MSA	28.33	649	204,045	803	17,022	3	12	0	0	1,455	221,079	24.76
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	10	52,740	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF FLORIDA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	1,046	71.50	2.96	1.82	22.08	25.33	36.12	38.05	38.83	34.80	1.49	1.70	2.71	1.40	1.10
Limited Review:															
Naples-Immokalee-Marco Island MSA	417	28.50	2.40	5.76	16.42	15.83	46.03	48.68	35.15	29.74	1.42	3.63	1.79	1.34	1.23

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Institution ID: USBNA

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF FLORIDA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	12	66.67	2.96	0.00	22.08	16.67	36.12	50.00	38.83	33.33	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Naples-Immokalee-Marco Island MSA	6	33.33	2.40	0.00	16.42	0.00	46.03	33.33	35.15	66.67	0.28	0.00	0.00	0.00	1.16

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF FLORIDA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	610	72.97	2.96	0.66	22.08	10.16	36.12	34.10	38.83	55.08	0.58	0.00	0.76	0.44	0.64
Limited Review:															
Naples-Immokalee-Marco Island MSA	226	27.03	2.40	0.00	16.42	9.73	46.03	47.35	35.15	42.92	0.55	0.00	0.55	0.65	0.42

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF FLORIDA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	0	0.00	6.39	0.00	31.55	0.00	33.58	0.00	28.47	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Naples-Immokalee-Marco Island MSA	0	0.00	3.02	0.00	13.85	0.00	39.45	0.00	43.68	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF FLORIDA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach-Boca Raton-Delray Beach MD	2,002	71.37	3.57	3.90	18.88	17.78	31.75	31.62	45.56	46.70	1.30	1.43	1.15	1.39	1.25
Limited Review:															
Naples-Immokalee-Marco Island MSA	803	28.63	2.68	3.11	13.33	10.71	42.64	34.00	41.35	52.18	2.12	4.74	1.61	1.81	2.44

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF FLORIDA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
West Palm Beach-Boca Raton-Delray Beach MD	6	66.67	4.15	0.00	21.50	0.00	30.05	50.00	44.23	50.00	4.50	20.00	0.00	13.64	1.32
Limited Review:															
Naples-Immokalee-Marco Island MSA	3	33.33	6.46	0.00	18.77	0.00	49.22	66.67	25.55	33.33	6.90	0.00	0.00	9.09	0.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF FLORIDA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	1,046	71.50	21.50	3.09	17.84	5.67	18.93	4.64	41.73	86.60	0.31	0.38	0.09	0.11	0.44
Limited Review:															
Naples-Immokalee-Marco Island MSA	417	28.50	21.14	0.00	18.31	3.47	19.04	6.94	41.50	89.58	0.63	0.00	0.10	0.17	0.87

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF FLORIDA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	12	66.67	21.50	0.00	17.84	16.67	18.93	16.67	41.73	66.67	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Naples-Immokalee-Marco Island MSA	6	33.33	21.14	0.00	18.31	0.00	19.04	0.00	41.50	100.00	0.30	0.00	0.00	0.00	0.59

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF FLORIDA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
West Palm Beach-Boca Raton-Delray Beach MD	610	72.97	21.50	5.93	17.84	11.60	18.93	15.46	41.73	67.01	0.44	0.33	0.57	0.29	0.47
Limited Review:															
Naples-Immokalee-Marco Island MSA	226	27.03	21.14	7.84	18.31	7.84	19.04	10.46	41.50	73.86	0.46	0.00	0.21	0.30	0.61

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF FLORIDA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
West Palm Beach-Boca Raton-Delray Beach MD	2,007	71.42	82.65	55.71	97.86	1.64	0.50	1.30	1.37
Limited Review:									
Naples-Immokalee-Marco Island MSA	803	28.58	81.51	59.03	97.76	0.87	1.37	2.12	2.01

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF FLORIDA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
West Palm Beach-Boca Raton-Delray Beach MD	6	66.67	96.14	66.67	100.00	0.00	0.00	4.50	7.41
Limited Review:									
Naples-Immokalee-Marco Island MSA	3	33.33	94.39	66.67	100.00	0.00	0.00	6.90	10.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF FLORIDA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
West Palm Beach-Boca Raton-Delray Beach MD	2	554	2	4,263	4	4,817	86.26	0	0
Limited Review:									
Naples-Immokalee-Marco Island MSA	1	3	10	764	11	767	13.74	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	1	0	1	0	0.00	0	0
Qualified Investments Outside AAs	10	9,622	211	235,959	221	245,581	NA	8	170

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

Institution ID: USBNA

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF FLORIDA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
West Palm Beach-Boca Raton-Delray Beach MD	75.24	1	50.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.88	26.01	33.30	35.59
Limited Review:																	
Naples-Immokalee-Marco Island MSA	24.76	1	50.00	0.00	0.00	0.00	100.00	0	0	0	0	0	0	9.05	20.27	43.40	27.27

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF FLORIDA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
West Palm Beach-Boca Raton-Delray Beach MD	75.24	1	50.00	0.00	0.00	0.00	100.00	0	0.00	0.00	0.00	0.00	0.00	4.88	26.01	33.30	35.59
Limited Review:																	
Naples-Immokalee-Marco Island MSA	24.76	1	50.00	0.00	0.00	0.00	100.00	0	0.00	0.00	0.00	0.00	0.00	9.05	20.27	43.40	27.27

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF IDAHO												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Boise City MSA	46.70	6,722	1,134,426	9,217	369,449	404	40,073	33	94,940	16,376	1,638,888	54.89
Limited Review:												
Coeur d'Alene MSA	10.65	1,779	311,313	1,914	69,789	35	535	6	10,396	3,734	392,033	6.28
Idaho Falls MSA	5.17	727	108,005	992	23,858	91	7,194	4	1,804	1,814	140,861	4.08
Pocatello MSA 2012-2013	1.39	219	27,458	237	8,967	27	4,965	4	1,345	487	42,735	1.08
Pocatello MSA 2014-2015	0.86	100	12,370	193	8,569	6	165	3	1,580	302	22,684	0.94
ID NonMSA Total 2012-2013	18.71	2,899	467,595	3,321	98,303	321	32,198	20	5,743	6,561	603,839	16.29
ID NonMSA Total 2014-2015	16.50	1,517	245,380	3,645	81,146	604	35,201	19	4,773	5,785	366,500	16.43
Statewide:												
CD Loans That Serve AAs	0.01	NA	NA	NA	NA	NA	NA	5	5,409	5	5,409	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF IDAHO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Boise City MSA	2,358	51.86	0.58	0.17	24.66	16.07	44.24	37.15	30.52	46.61	2.58	2.13	2.08	2.24	3.26
Limited Review:															
Coeur d'Alene MSA	548	12.05	2.13	1.46	10.52	11.50	68.72	69.71	18.63	17.34	3.75	3.17	4.01	3.68	4.00
Idaho Falls MSA	261	5.74	0.00	0.00	14.05	10.73	61.79	54.41	24.16	34.87	2.13	0.00	1.69	2.12	2.33
Pocatello MSA 2012-2013	68	1.50	0.89	0.00	13.44	2.94	59.61	52.94	26.06	44.12	2.80	0.00	0.58	2.06	5.26
Pocatello MSA 2014-2015	44	0.97	0.97	0.00	14.64	11.36	56.00	56.82	28.40	31.82	1.14	0.00	1.86	1.01	1.12
ID NonMSA Total 2012-2013	701	15.42	0.37	0.57	6.26	4.42	80.70	79.74	12.67	15.26	5.95	4.55	3.88	6.10	6.03
ID NonMSA Total 2014-2015	567	12.47	0.36	0.00	6.17	3.70	79.72	75.31	13.74	20.99	3.69	0.00	2.04	3.72	4.24

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: STATE OF IDAHO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Boise City MSA	291	35.19	0.58	0.00	24.66	22.34	44.24	49.14	30.52	28.52	9.33	0.00	12.44	8.20	8.98
Limited Review:															
Coeur d'Alene MSA	104	12.58	2.13	0.96	10.52	17.31	68.72	62.50	18.63	19.23	9.06	0.00	3.85	10.00	9.09
Idaho Falls MSA	37	4.47	0.00	0.00	14.05	10.81	61.79	48.65	24.16	40.54	4.49	0.00	9.09	4.29	3.66
Pocatello MSA 2012-2013	10	1.21	0.89	0.00	13.44	20.00	59.61	70.00	26.06	10.00	6.98	0.00	18.18	7.02	0.00
Pocatello MSA 2014-2015	4	0.48	0.97	0.00	14.64	0.00	56.00	75.00	28.40	25.00	2.11	0.00	0.00	1.79	4.17
ID NonMSA Total 2012-2013	202	24.43	0.37	0.00	6.26	2.48	80.70	91.58	12.67	5.94	20.44	0.00	27.27	21.68	9.62
ID NonMSA Total 2014-2015	179	21.64	0.36	0.00	6.17	4.47	79.72	83.24	13.74	12.29	18.98	0.00	37.50	17.74	22.22

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF IDAHO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Boise City MSA	4,070	47.55	0.58	0.10	24.66	15.97	44.24	42.87	30.52	41.06	5.24	11.11	5.31	5.45	4.91
Limited Review:															
Coeur d'Alene MSA	1,121	13.10	2.13	0.71	10.52	10.26	68.72	68.42	18.63	20.61	6.51	3.13	5.31	6.48	7.36
Idaho Falls MSA	427	4.99	0.00	0.00	14.05	10.54	61.79	62.30	24.16	27.17	4.36	0.00	7.18	4.16	3.61
Pocatello MSA 2012-2013	141	1.65	0.89	1.42	13.44	8.51	59.61	60.28	26.06	29.79	3.53	5.26	2.85	3.73	3.39
Pocatello MSA 2014-2015	51	0.60	0.97	1.96	14.64	13.73	56.00	56.86	28.40	27.45	3.17	7.69	4.88	3.33	2.00
ID NonMSA Total 2012-2013	1,986	23.20	0.37	0.10	6.26	3.63	80.70	81.22	12.67	15.06	9.66	0.00	7.28	10.37	7.98
ID NonMSA Total 2014-2015	763	8.91	0.36	0.26	6.17	4.06	79.72	75.75	13.74	19.92	8.44	2.86	8.00	8.24	9.43

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF IDAHO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Boise City MSA	3	10.00	1.56	0.00	46.21	100.00	34.36	0.00	17.87	0.00	2.86	0.00	6.25	0.00	0.00
Limited Review:															
Coeur d'Alene MSA	6	20.00	23.53	0.00	22.64	50.00	44.52	50.00	9.31	0.00	7.14	0.00	16.67	0.00	0.00
Idaho Falls MSA	2	6.67	0.00	0.00	62.16	0.00	23.01	100.00	14.83	0.00	11.11	0.00	0.00	33.33	0.00
Pocatello MSA 2012-2013	0	0.00	17.12	0.00	22.87	0.00	50.13	0.00	9.87	0.00	0.00	0.00	0.00	0.00	0.00
Pocatello MSA 2014-2015	1	3.33	17.98	0.00	24.02	100.00	47.63	0.00	10.37	0.00	0.00	0.00	0.00	0.00	0.00
ID NonMSA Total 2012-2013	10	33.33	6.10	0.00	14.83	0.00	58.70	90.00	20.37	10.00	22.73	0.00	0.00	26.67	50.00
ID NonMSA Total 2014-2015	8	26.67	6.06	0.00	14.71	0.00	57.18	100.00	22.05	0.00	16.00	0.00	0.00	25.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF IDAHO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise City MSA	9,217	47.22	0.97	0.60	31.10	28.90	38.15	37.81	29.79	32.69	16.83	11.21	16.94	16.50	17.11
Limited Review:															
Coeur d'Alene MSA	1,914	9.81	10.72	7.73	17.14	15.88	55.97	58.36	16.17	18.03	15.16	15.13	16.23	13.87	16.51
Idaho Falls MSA	992	5.08	0.00	0.00	23.05	24.40	48.37	52.82	28.58	22.78	7.49	0.00	9.27	7.06	6.54
Pocatello MSA 2012-2013	237	1.21	5.61	4.64	20.25	23.21	52.41	54.01	21.74	18.14	8.20	3.95	8.00	9.73	6.04
Pocatello MSA 2014-2015	193	0.99	7.15	8.29	23.15	20.21	45.85	43.52	23.85	27.98	6.83	6.09	6.34	6.25	7.85
ID NonMSA Total 2012-2013	3,321	17.01	1.14	0.69	7.42	4.22	77.40	83.53	14.03	11.56	19.31	7.75	11.21	20.94	15.20
ID NonMSA Total 2014-2015	3,645	18.67	1.27	0.77	7.10	3.54	77.24	80.69	14.38	15.01	19.02	10.07	11.15	19.56	15.21

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF IDAHO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Boise City MSA	404	27.15	0.70	0.00	27.49	41.34	50.00	46.78	21.81	11.88	23.95	0.00	29.51	19.66	30.23
Limited Review:															
Coeur d'Alene MSA	35	2.35	2.39	0.00	12.73	5.71	70.03	77.14	14.85	17.14	31.03	0.00	0.00	34.78	33.33
Idaho Falls MSA	91	6.12	0.00	0.00	6.91	0.00	69.13	93.41	23.95	6.59	6.38	0.00	25.00	6.77	3.23
Pocatello MSA 2012-2013	27	1.81	0.49	0.00	5.11	0.00	78.35	92.59	16.06	7.41	11.83	0.00	0.00	14.29	0.00
Pocatello MSA 2014-2015	6	0.40	0.98	0.00	7.80	33.33	61.46	50.00	29.76	16.67	8.33	0.00	33.33	9.52	0.00
ID NonMSA Total 2012-2013	321	21.57	0.27	0.00	3.76	1.56	87.28	93.15	8.69	5.30	10.03	0.00	11.54	11.35	1.82
ID NonMSA Total 2014-2015	604	40.59	0.19	0.00	3.68	2.65	87.26	92.22	8.87	5.13	15.96	0.00	30.00	16.67	8.29

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF IDAHO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Boise City MSA	2,358	51.86	19.52	10.95	18.37	17.86	22.47	18.13	39.65	53.05	1.39	1.02	0.94	0.84	2.05
Limited Review:															
Coeur d'Alene MSA	548	12.05	18.94	3.85	19.61	15.71	21.33	18.27	40.13	62.18	2.15	3.03	1.34	0.81	3.25
Idaho Falls MSA	261	5.74	17.65	6.00	19.30	28.00	22.93	21.00	40.12	45.00	0.96	0.33	1.15	0.68	1.21
Pocatello MSA 2012-2013	68	1.50	19.82	0.00	18.18	38.46	22.44	15.38	39.55	46.15	1.00	0.00	1.56	0.28	1.50
Pocatello MSA 2014-2015	44	0.97	20.47	14.29	17.37	42.86	22.73	28.57	39.43	14.29	0.30	0.00	0.57	0.54	0.00
ID NonMSA Total 2012-2013	701	15.42	18.98	6.50	19.15	17.94	22.47	24.89	39.40	50.67	4.47	3.93	3.43	4.73	4.82
ID NonMSA Total 2014-2015	567	12.47	18.91	6.78	19.22	22.36	22.46	21.86	39.41	48.99	3.08	3.42	3.32	2.46	3.26

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															
Geography: STATE OF IDAHO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Boise City MSA	291	35.19	19.52	11.72	18.37	22.71	22.47	24.18	39.65	41.39	8.91	8.33	11.64	9.54	7.33
Limited Review:															
Coeur d'Alene MSA	104	12.58	18.94	13.04	19.61	19.57	21.33	22.83	40.13	44.57	8.26	11.76	11.90	4.92	8.20
Idaho Falls MSA	37	4.47	17.65	9.09	19.30	21.21	22.93	15.15	40.12	54.55	4.21	12.50	9.52	1.82	2.70
Pocatello MSA 2012-2013	10	1.21	19.82	0.00	18.18	37.50	22.44	25.00	39.55	37.50	6.02	0.00	7.14	4.55	7.69
Pocatello MSA 2014-2015	4	0.48	20.47	0.00	17.37	100.00	22.73	0.00	39.43	0.00	2.22	0.00	10.00	0.00	0.00
ID NonMSA Total 2012-2013	202	24.43	18.98	7.37	19.15	18.95	22.47	27.89	39.40	45.79	18.74	15.38	26.56	19.51	16.52
ID NonMSA Total 2014-2015	179	21.64	18.91	2.91	19.22	24.42	22.46	20.93	39.41	51.74	19.13	11.54	23.88	20.00	18.33

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF IDAHO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Boise City MSA	4,070	47.55	19.52	8.42	18.37	18.49	22.47	24.71	39.65	48.39	5.88	6.96	6.25	5.70	5.65
Limited Review:															
Coeur d'Alene MSA	1,121	13.10	18.94	7.15	19.61	18.62	21.33	21.91	40.13	52.33	6.34	2.94	5.33	6.26	7.14
Idaho Falls MSA	427	4.99	17.65	9.97	19.30	20.60	22.93	23.26	40.12	46.18	4.35	5.77	7.11	3.86	3.32
Pocatello MSA 2012-2013	141	1.65	19.82	13.48	18.18	19.10	22.44	28.09	39.55	39.33	2.87	5.30	3.29	3.55	1.93
Pocatello MSA 2014-2015	51	0.60	20.47	6.06	17.37	24.24	22.73	30.30	39.43	39.39	2.98	3.39	4.55	3.47	2.05
ID NonMSA Total 2012-2013	1,986	23.20	18.98	5.90	19.15	16.33	22.47	24.18	39.40	53.58	9.46	9.09	11.72	9.98	8.77
ID NonMSA Total 2014-2015	763	8.91	18.91	5.70	19.22	15.94	22.46	24.85	39.41	53.51	9.75	6.90	9.59	10.47	9.80

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF IDAHO									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Boise City MSA	9,217	47.22	79.19	52.18	92.84	2.52	4.64	16.83	16.63
Limited Review:									
Coeur d'Alene MSA	1,914	9.81	81.05	62.07	93.83	2.14	4.02	15.16	15.17
Idaho Falls MSA	992	5.08	77.96	45.67	96.07	2.02	1.92	7.49	7.85
Pocatello MSA 2012-2013	237	1.21	72.01	52.74	92.83	3.80	3.38	8.20	8.63
Pocatello MSA 2014-2015	193	0.99	75.31	46.11	90.67	3.63	5.70	6.83	6.10
ID NonMSA Total 2012-2013	3,321	17.01	74.54	57.33	94.58	3.01	2.41	19.31	21.48
ID NonMSA Total 2014-2015	3,645	18.67	77.80	53.64	96.52	1.84	1.65	19.02	19.03

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF IDAHO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Boise City MSA	404	27.15	95.35	54.46	72.28	12.62	15.10	23.95	19.44
Limited Review:									
Coeur d'Alene MSA	35	2.35	97.35	62.86	100.00	0.00	0.00	31.03	37.50
Idaho Falls MSA	91	6.12	94.37	71.43	81.32	6.59	12.09	6.38	7.32
Pocatello MSA 2012-2013	27	1.81	96.59	66.67	37.04	40.74	22.22	11.83	11.76
Pocatello MSA 2014-2015	6	0.40	98.05	100.00	100.00	0.00	0.00	8.33	12.00
ID NonMSA Total 2012-2013	321	21.57	96.06	72.90	72.27	13.71	14.02	10.03	10.84
ID NonMSA Total 2014-2015	604	40.59	95.20	61.59	82.95	10.26	6.79	15.96	15.40

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF IDAHO Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Boise City MSA	89	14,630	130	23,977	219	38,607	39.33	0	0
Limited Review:									
Coeur d'Alene MSA	22	1,825	40	20,458	62	22,283	22.70	2	21
Idaho Falls MSA	13	938	15	1,838	28	2,776	2.83	0	0
Pocatello MSA 2012-2013	13	577	14	700	27	1,277	1.30	0	0
Pocatello MSA 2014-2015	12	457	5	29	17	486	0.50	0	0
ID NonMSA Total 2012-2013	91	7,790	41	5,286	132	13,076	13.32	0	0
ID NonMSA Total 2014-2015	88	7,069	51	11,778	139	18,847	19.20	0	0
Statewide:									
Qualified Investments That Serve AAs	3	700	21	102	24	802	0.82	0	0
Qualified Investments Outside AAs	0	0	1	3,884	1	3,884	NA	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF IDAHO																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Boise City MSA	54.89	39	41.49	0.00	43.59	35.90	20.51	2	0	0	1	0	1	1.20	28.50	42.80	27.51
Limited Review:																	
Coeur d'Alene MSA	6.28	5	5.32	0.00	40.00	40.00	20.00	0	0	0	0	0	0	3.45	13.17	67.49	15.88
Idaho Falls MSA	4.08	4	4.26	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	17.71	61.48	20.82
Pocatello MSA 2012-2013	1.08	3	NA	0.00	66.67	33.33	0.00	0	0	0	0	0	0	3.22	14.40	59.27	23.12
Pocatello MSA 2014-2015	0.94	2	2.13	0.00	100.00	0.00	0.00	0	0	0	0	0	0	3.52	15.76	55.42	25.30
ID NonMSA Total 2012-2013	16.29	43	NA	2.33	6.98	83.72	6.98	0	0	0	0	0	0	1.77	8.83	78.16	11.24
ID NonMSA Total 2014-2015	16.43	44	46.81	2.27	6.82	84.09	6.82	0	0	0	0	0	0	1.75	8.69	77.24	12.32

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography:																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Boise City MSA	54.89	39	41.49	0.00	43.59	35.90	20.51	59	46.09	0.00	42.37	32.20	25.42	1.20	28.50	42.80	27.51
Limited Review:																	
Coeur d'Alene MSA	6.28	5	5.32	0.00	40.00	40.00	20.00	10	7.81	20.00	20.00	50.00	10.00	3.45	13.17	67.49	15.88
Idaho Falls MSA	4.08	4	4.26	0.00	50.00	50.00	0.00	6	4.69	0.00	33.33	50.00	16.67	0.00	17.71	61.48	20.82
Pocatello MSA 2012-2013	1.08	3	NA	0.00	66.67	33.33	0.00	5	NA	20.00	60.00	20.00	0.00	3.22	14.40	59.27	23.12
Pocatello MSA 2014-2015	0.94	2	2.13	0.00	100.00	0.00	0.00	4	3.13	25.00	75.00	0.00	0.00	3.52	15.76	55.42	25.30
ID NonMSA Total 2012-2013	16.29	43	NA	2.33	6.98	83.72	6.98	50	NA	2.00	10.00	78.00	10.00	1.77	8.83	78.16	11.24
ID NonMSA Total 2014-2015	16.43	44	46.81	2.27	6.82	84.09	6.82	49	38.28	2.04	8.16	81.63	8.16	1.75	8.69	77.24	12.32

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF ILLINOIS												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Springfield MSA	18.44	2,109	236,981	1,539	79,722	129	16,752	10	5,027	3,787	338,482	27.03
Limited Review:												
Bloomington MSA 2012-2013	5.60	704	109,192	438	11,446	8	982	0	0	1,150	121,620	3.81
Bloomington MSA 2014-2015	6.09	780	95,073	443	10,611	26	1,149	2	9,266	1,251	116,099	3.81
Carbondale-Marion MSA 2014-2015	2.57	310	33,887	213	7,133	4	26	0	0	527	41,046	1.80
Rockford MSA	21.20	2,096	187,804	2,224	35,710	34	519	0	0	4,354	224,033	13.53
IL NonMSA Total 2012-2013	26.50	2,866	270,647	2,198	64,464	377	43,720	2	3,500	5,443	382,331	25.91
IL NonMSA Total 2014-2015	19.58	1,673	141,292	1,918	38,944	428	41,132	2	1,919	4,021	223,287	24.11
Statewide:												
CD Loans That Serve AAs	0.02	NA	NA	NA	NA	NA	NA	4	44,000	4	44,000	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	5	11,430	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Springfield MSA	1,513	23.74	6.44	6.21	17.47	25.25	40.46	45.08	35.63	23.46	9.34	15.64	14.49	9.78	5.68
Limited Review:															
Bloomington MSA 2012-2013	297	4.66	0.65	0.00	13.66	14.48	61.45	56.57	24.24	28.96	4.20	0.00	8.79	4.31	2.57
Bloomington MSA 2014-2015	688	10.80	0.65	0.15	13.66	17.30	58.03	64.68	27.66	17.88	8.45	0.00	14.76	9.43	4.64
Carbondale-Marion MSA 2014-2015	234	3.67	0.00	0.00	14.29	17.09	58.88	49.15	26.82	33.76	10.75	0.00	12.20	8.63	13.45
Rockford MSA	1,522	23.88	4.75	1.38	20.52	20.43	46.11	54.07	28.62	24.11	12.63	12.66	16.09	13.80	9.27
IL NonMSA Total 2012-2013	1,040	16.32	0.43	0.00	17.40	18.75	68.17	64.13	14.00	17.12	13.93	0.00	16.43	12.88	15.95
IL NonMSA Total 2014-2015	1,079	16.93	0.49	0.09	17.11	18.81	67.34	64.41	15.05	16.68	14.26	0.00	15.70	13.89	14.46

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: STATE OF ILLINOIS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Springfield MSA	74	13.33	6.44	8.11	17.47	17.57	40.46	41.89	35.63	32.43	3.54	3.85	4.62	2.99	3.70
Limited Review:															
Bloomington MSA 2012-2013	11	1.98	0.65	0.00	13.66	9.09	61.45	81.82	24.24	9.09	3.46	0.00	3.03	4.09	1.79
Bloomington MSA 2014-2015	11	1.98	0.65	0.00	13.66	36.36	58.03	45.45	27.66	18.18	1.63	0.00	4.17	1.91	0.00
Carbondale-Marion MSA 2014-2015	12	2.16	0.00	0.00	14.29	16.67	58.88	41.67	26.82	41.67	7.55	0.00	11.11	6.35	8.82
Rockford MSA	67	12.07	4.75	8.96	20.52	19.40	46.11	41.79	28.62	29.85	3.28	9.09	7.14	1.46	3.67
IL NonMSA Total 2012-2013	234	42.16	0.43	0.00	17.40	14.53	68.17	69.23	14.00	16.24	14.50	0.00	9.45	15.29	16.03
IL NonMSA Total 2014-2015	146	26.31	0.49	1.37	17.11	21.92	67.34	57.53	15.05	19.18	10.55	0.00	15.79	8.53	13.39

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF ILLINOIS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Springfield MSA	519	14.44	6.44	3.66	17.47	12.14	40.46	36.99	35.63	47.21	2.69	1.56	3.82	2.26	2.82
Limited Review:															
Bloomington MSA 2012-2013	394	10.96	0.65	0.51	13.66	8.38	61.45	47.97	24.24	43.15	2.87	0.00	3.03	2.78	3.05
Bloomington MSA 2014-2015	80	2.23	0.65	2.50	13.66	10.00	58.03	43.75	27.66	43.75	1.93	0.00	1.86	1.33	2.96
Carbondale-Marion MSA 2014-2015	64	1.78	0.00	0.00	14.29	7.81	58.88	56.25	26.82	35.94	7.52	0.00	1.96	7.74	8.77
Rockford MSA	501	13.94	4.75	1.00	20.52	14.57	46.11	47.50	28.62	36.93	1.98	0.00	2.23	1.98	1.96
IL NonMSA Total 2012-2013	1,589	44.21	0.43	0.13	17.40	13.66	68.17	66.14	14.00	20.08	13.29	0.00	16.49	12.41	14.62
IL NonMSA Total 2014-2015	447	12.44	0.49	0.00	17.11	17.23	67.34	62.86	15.05	19.91	10.73	0.00	14.65	10.39	9.65

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Springfield MSA	2	13.33	15.70	0.00	32.77	50.00	30.94	50.00	20.59	0.00	2.17	0.00	0.00	5.00	0.00
Limited Review:															
Bloomington MSA 2012-2013	2	13.33	5.07	0.00	11.62	0.00	66.13	100.00	17.18	0.00	0.00	0.00	0.00	0.00	0.00
Bloomington MSA 2014-2015	1	6.67	5.07	0.00	11.62	0.00	66.03	0.00	17.28	100.00	0.00	0.00	0.00	0.00	0.00
Carbondale-Marion MSA 2014-2015	0	0.00	0.00	0.00	53.49	0.00	28.15	0.00	18.36	0.00	0.00	0.00	0.00	0.00	0.00
Rockford MSA	6	40.00	13.60	0.00	39.80	16.67	33.25	66.67	13.35	16.67	5.00	0.00	0.00	9.09	0.00
IL NonMSA Total 2012-2013	3	20.00	1.48	0.00	21.33	0.00	63.09	100.00	14.10	0.00	0.00	0.00	0.00	0.00	0.00
IL NonMSA Total 2014-2015	1	6.67	1.63	0.00	17.95	100.00	65.23	0.00	15.19	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF ILLINOIS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield MSA	1,468	16.51	11.19	10.90	21.15	22.62	31.97	35.97	31.62	30.52	16.22	14.55	19.61	16.40	14.27
Limited Review:															
Bloomington MSA 2012-2013	437	4.92	5.14	6.41	10.24	9.84	67.29	65.68	16.85	18.08	10.40	15.32	13.48	9.79	9.38
Bloomington MSA 2014-2015	443	4.98	5.85	6.09	9.74	10.16	63.94	62.98	19.89	20.77	10.04	15.05	12.08	10.10	7.80
Carbondale-Marion MSA 2014-2015	213	2.40	0.00	0.00	38.27	37.09	40.60	39.91	21.13	23.00	13.33	0.00	14.38	13.17	11.90
Rockford MSA	2,213	24.89	7.15	5.78	21.53	21.64	43.84	48.44	26.99	24.13	16.95	11.56	17.71	18.23	15.38
IL NonMSA Total 2012-2013	2,198	24.72	1.35	2.41	23.45	19.93	61.30	61.83	13.90	15.83	24.26	35.63	21.98	23.94	28.03
IL NonMSA Total 2014-2015	1,918	21.57	1.75	1.82	21.89	20.96	61.14	59.44	15.22	17.78	22.71	25.00	24.23	21.62	24.36

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF ILLINOIS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield MSA	129	12.82	2.91	0.78	8.32	0.00	52.70	52.71	35.92	46.51	25.76	0.00	0.00	17.02	48.65
Limited Review:															
Bloomington MSA 2012-2013	8	0.80	0.52	0.00	3.53	0.00	87.32	100.00	8.63	0.00	0.42	0.00	0.00	0.44	0.00
Bloomington MSA 2014-2015	26	2.58	0.39	0.00	3.67	0.00	80.08	88.46	15.86	11.54	1.97	0.00	0.00	2.24	0.00
Carbondale-Marion MSA 2014-2015	4	0.40	0.00	0.00	10.45	0.00	66.67	100.00	22.89	0.00	6.52	0.00	0.00	4.88	0.00
Rockford MSA	34	3.38	2.37	0.00	12.93	11.76	51.89	52.94	32.49	35.29	13.21	0.00	0.00	20.00	9.09
IL NonMSA Total 2012-2013	377	37.48	0.11	0.00	5.58	1.86	77.72	89.12	16.58	9.02	21.50	0.00	11.11	22.43	18.69
IL NonMSA Total 2014-2015	428	42.54	0.12	0.00	5.27	2.57	77.83	86.68	16.78	10.75	24.10	0.00	18.42	24.75	22.22

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Springfield MSA	1,513	23.74	22.31	13.98	15.92	29.79	21.83	26.14	39.94	30.09	2.25	2.05	2.51	2.48	2.00
Limited Review:															
Bloomington MSA 2012-2013	297	4.66	19.14	7.92	17.34	36.63	24.16	22.77	39.36	32.67	0.85	0.82	1.47	0.52	0.57
Bloomington MSA 2014-2015	688	10.80	18.38	7.14	16.60	50.00	23.80	14.29	41.21	28.57	0.44	0.25	0.94	0.14	0.36
Carbondale-Marion MSA 2014-2015	234	3.67	21.00	8.18	17.80	23.90	20.11	27.67	41.09	40.25	8.96	6.67	9.93	11.17	7.67
Rockford MSA	1,522	23.88	22.55	13.66	18.05	31.71	21.56	25.37	37.84	29.27	1.29	1.17	0.80	1.72	1.50
IL NonMSA Total 2012-2013	1,040	16.32	20.96	12.67	19.20	29.48	21.74	27.58	38.11	30.27	12.67	12.20	12.67	14.02	11.82
IL NonMSA Total 2014-2015	1,079	16.93	20.56	14.67	19.20	31.26	21.91	30.96	38.33	23.11	11.98	17.77	14.09	12.42	7.84

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT															
Geography: STATE OF ILLINOIS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Springfield MSA	74	13.33	22.31	9.72	15.92	27.78	21.83	23.61	39.94	38.89	3.76	1.89	7.95	3.91	2.38
Limited Review:															
Bloomington MSA 2012-2013	11	1.98	19.14	14.29	17.34	42.86	24.16	28.57	39.36	14.29	1.99	2.78	4.35	1.54	0.00
Bloomington MSA 2014-2015	11	1.98	18.38	9.09	16.60	36.36	23.80	36.36	41.21	18.18	1.70	0.00	4.35	1.49	1.10
Carbondale-Marion MSA 2014-2015	12	2.16	21.00	8.33	17.80	8.33	20.11	41.67	41.09	41.67	7.62	14.29	0.00	11.54	7.27
Rockford MSA	67	12.07	22.55	6.06	18.05	27.27	21.56	24.24	37.84	42.42	3.48	5.88	8.14	2.00	1.30
IL NonMSA Total 2012-2013	234	42.16	20.96	10.13	19.20	24.23	21.74	28.19	38.11	37.44	15.97	18.52	17.48	14.87	15.28
IL NonMSA Total 2014-2015	146	26.31	20.56	11.19	19.20	17.48	21.91	31.47	38.33	39.86	10.72	9.38	8.51	14.79	9.82

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF ILLINOIS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Springfield MSA	519	14.44	22.31	9.05	15.92	20.36	21.83	25.79	39.94	44.80	2.51	1.46	3.77	3.11	1.83
Limited Review:															
Bloomington MSA 2012-2013	394	10.96	19.14	10.61	17.34	17.68	24.16	33.84	39.36	37.88	1.77	1.34	1.70	2.27	1.55
Bloomington MSA 2014-2015	80	2.23	18.38	10.64	16.60	21.28	23.80	25.53	41.21	42.55	0.97	0.41	0.99	0.98	1.11
Carbondale-Marion MSA 2014-2015	64	1.78	21.00	3.77	17.80	18.87	20.11	20.75	41.09	56.60	7.46	3.57	9.59	5.71	7.98
Rockford MSA	501	13.94	22.55	9.42	18.05	20.56	21.56	27.62	37.84	42.40	2.29	0.47	2.20	2.67	2.56
IL NonMSA Total 2012-2013	1,589	44.21	20.96	7.32	19.20	20.68	21.74	27.46	38.11	44.54	13.87	13.17	17.65	13.27	12.99
IL NonMSA Total 2014-2015	447	12.44	20.56	9.64	19.20	22.41	21.91	27.47	38.33	40.48	11.41	10.09	13.18	11.72	10.73

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF ILLINOIS									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Springfield MSA	1,539	17.15	72.76	60.62	86.55	7.99	5.46	16.22	19.94
Limited Review:									
Bloomington MSA 2012-2013	438	4.88	70.64	61.42	95.43	1.60	2.97	10.40	12.62
Bloomington MSA 2014-2015	443	4.94	74.09	61.17	96.16	1.81	2.03	10.04	12.76
Carbondale-Marion MSA 2014-2015	213	2.37	74.68	55.87	93.43	3.76	2.82	13.33	15.81
Rockford MSA	2,224	24.79	75.04	49.46	98.02	0.99	0.99	16.95	20.16
IL NonMSA Total 2012-2013	2,198	24.50	72.11	55.96	94.40	3.00	2.59	24.26	30.66
IL NonMSA Total 2014-2015	1,918	21.38	74.82	56.62	96.45	2.03	1.51	22.71	28.56

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF ILLINOIS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Springfield MSA	129	12.82	97.36	76.74	64.34	17.05	18.60	25.76	28.75
Limited Review:									
Bloomington MSA 2012-2013	8	0.80	98.75	87.50	50.00	25.00	25.00	0.42	0.59
Bloomington MSA 2014-2015	26	2.58	98.17	65.38	84.62	7.69	7.69	1.97	2.56
Carbondale-Marion MSA 2014-2015	4	0.40	97.51	75.00	100.00	0.00	0.00	6.52	6.25
Rockford MSA	34	3.38	96.85	50.00	94.12	5.88	0.00	13.21	13.79
IL NonMSA Total 2012-2013	377	37.48	99.13	79.84	62.60	24.67	12.73	21.50	26.82
IL NonMSA Total 2014-2015	428	42.54	99.11	67.99	67.76	21.26	10.98	24.10	29.67

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF ILLINOIS Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Springfield MSA	18	3,259	37	4,464	55	7,723	15.22	0	0
Limited Review:									
Bloomington MSA 2012-2013	6	256	7	449	13	705	1.39	0	0
Bloomington MSA 2014-2015	6	222	8	6,073	14	6,295	12.41	0	0
Carbondale-Marion MSA 2014-2015	4	518	5	115	9	633	1.25	0	0
Rockford MSA	26	1,282	66	2,511	92	3,793	7.48	0	0
IL NonMSA Total 2012-2013	70	12,020	89	3,494	159	15,514	30.58	0	0
IL NonMSA Total 2014-2015	34	6,753	71	4,274	105	11,027	21.73	0	0
Statewide:									
Qualified Investments That Serve AAs	2	981	14	4,069	16	5,050	9.95	0	0
Qualified Investments Outside AAs	4	200	72	57,152	76	57,352	NA	1	18

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF ILLINOIS																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Springfield MSA	27.03	4	11.43	25.00	25.00	0.00	25.00	0	2	0	0	-1	-1	11.39	18.64	37.54	31.92
Limited Review:																	
Bloomington MSA 2012-2013	3.81	2	NA	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.52	13.01	59.38	21.94
Bloomington MSA 2014-2015	3.81	2	5.71	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.52	13.01	56.79	24.53
Carbondale-Marion MSA 2014-2015	1.80	1	2.86	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	18.53	55.83	25.64
Rockford MSA	13.53	7	20.00	28.57	14.29	14.29	42.86	0	1	0	-1	0	0	9.74	24.57	41.95	23.74
IL NonMSA Total 2012-2013	25.91	21	NA	4.76	23.81	61.90	9.52	0	0	0	0	0	0	0.66	19.59	67.14	12.61
IL NonMSA Total 2014-2015	24.11	21	60.00	4.76	19.05	66.67	9.52	1	0	0	0	1	0	0.76	18.91	66.80	13.52

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF ILLINOIS																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Springfield MSA	27.03	4	11.43	25.00	25.00	0.00	25.00	9	21.43	22.22	22.00	22.22	22.22	11.39	18.64	37.54	31.92
Limited Review:																	
Bloomington MSA 2012-2013	3.81	2	NA	0.00	0.00	100.00	0.00	2	NA	0.00	0.00	100.00	0.00	1.52	13.01	59.38	21.94
Bloomington MSA 2014-2015	3.81	2	5.71	0.00	0.00	100.00	0.00	2	4.76	0.00	0.00	100.00	0.00	1.52	13.01	56.79	24.53
Carbondale-Marion MSA 2014-2015	1.80	1	2.86	0.00	100.00	0.00	0.00	1	2.38	0.00	100.00	0.00	0.00	0.00	18.53	55.83	25.64
Rockford MSA	13.53	7	20.00	28.57	14.29	14.29	42.86	7	16.67	28.57	14.29	14.29	42.86	9.74	24.57	41.95	23.74
IL NonMSA Total 2012-2013	25.91	21	NA	4.76	23.81	61.90	9.52	23	NA	4.35	26.09	56.52	13.04	0.66	19.59	67.14	12.61
IL NonMSA Total 2014-2015	24.11	21	60.00	4.76	19.05	66.67	9.52	23	54.76	4.35	21.74	60.87	13.04	0.76	18.91	66.80	13.52

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF INDIANA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
IN NonMSA (Eastern Indiana)	100.00	955	75,331	1,644	25,357	153	10,528	5	315	2,757	111,531	100.00
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	2	7,530	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

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Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF INDIANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
IN NonMSA (Eastern Indiana)	181	100.00	0.00	0.00	22.28	16.57	69.64	66.30	8.08	17.13	2.06	0.00	1.28	2.17	2.58

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF INDIANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
IN NonMSA (Eastern Indiana)	94	100.00	0.00	0.00	22.28	13.83	69.64	78.72	8.08	7.45	9.68	0.00	8.51	9.88	12.50

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF INDIANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
IN NonMSA (Eastern Indiana)	679	100.00	0.00	0.00	22.28	14.87	69.64	73.20	8.08	11.93	11.65	0.00	10.37	11.42	16.90

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF INDIANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
IN NonMSA (Eastern Indiana)	1	100.00	0.00	0.00	51.88	0.00	32.09	0.00	16.03	100.00	12.50	0.00	0.00	0.00	50.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF INDIANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
IN NonMSA (Eastern Indiana)	1,644	100.00	0.00	0.00	30.57	30.60	59.10	62.23	10.33	7.18	33.67	0.00	33.59	34.83	26.83

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF INDIANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
IN NonMSA (Eastern Indiana)	153	100.00	0.00	0.00	4.49	0.65	87.03	88.24	8.47	11.11	8.74	0.00	0.00	8.29	21.05

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF INDIANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
IN NonMSA (Eastern Indiana)	181	100.00	21.71	11.18	20.34	32.89	22.92	26.32	35.03	29.61	1.09	0.00	1.49	0.72	1.69

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

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Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF INDIANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
IN NonMSA (Eastern Indiana)	94	100.00	21.71	19.15	20.34	26.60	22.92	27.66	35.03	26.60	10.05	9.09	12.28	11.32	7.58

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

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Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF INDIANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
IN NonMSA (Eastern Indiana)	679	100.00	21.71	13.13	20.34	22.75	22.92	29.01	35.03	35.11	14.05	17.89	10.89	16.10	13.52

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF INDIANA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
IN NonMSA (Eastern Indiana)	1,644	100.00	75.26	66.73	98.60	0.49	0.91	33.67	42.46

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

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Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF INDIANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
IN NonMSA (Eastern Indiana)	153	100.00	99.10	76.47	75.82	18.30	5.88	8.74	8.95

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF INDIANA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
IN NonMSA (Eastern Indiana)	32	4,828	64	2,123	96	6,951	100.00	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	1	0	1	0	0.00	0	0
Qualified Investments Outside AAs	4	34,075	178	60,233	182	94,308	NA	2	1,687

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF INDIANA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
IN NonMSA (Eastern Indiana)	100.00	12	100.00	0.00	33.33	58.33	8.33	0	0	0	0	0	0	0.00	28.41	64.33	7.26

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF INDIANA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
IN NonMSA (Eastern Indiana)	100.00	12	100.00	0.00	33.33	58.33	8.33	12	100.00	0.00	25.00	66.67	8.33	0.00	28.41	64.33	7.26

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF IOWA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cedar Rapids MSA	13.64	4,125	595,085	2,455	128,899	523	63,897	7	30,675	7,110	818,556	19.68
Limited Review:												
Ames MSA	3.56	886	144,692	806	36,278	155	18,121	6	14,517	1,853	213,608	5.96
Des Moines-West Des Moines MSA	29.12	9,690	1,532,063	5,336	225,577	131	9,544	18	31,270	15,175	1,798,454	21.74
Dubuque MSA	3.30	759	97,327	877	24,859	73	5,666	9	5,286	1,718	133,138	5.68
Iowa City MSA	8.53	2,943	526,266	1,286	45,158	209	21,154	6	4,690	4,444	597,268	6.46
Sioux City MSA 2012-2013	2.29	621	67,502	526	21,188	44	6,506	2	9,960	1,193	105,156	2.13
Sioux City MSA 2014-2015	1.30	252	27,781	396	19,519	30	3,793	0	0	678	51,093	2.13
Waterloo-Cedar Falls MSA	7.06	1,765	254,051	1,690	121,805	216	34,538	11	46,904	3,682	457,298	7.52
IA NonMSA Total 2012-2013	17.76	4,140	426,121	3,238	116,135	1,877	240,241	2	847	9,257	783,344	14.35
IA NonMSA Total 2014-2015	13.43	1,854	204,018	3,272	103,860	1,871	215,013	1	22	6,998	522,913	14.35
Statewide:												
CD Loans That Serve AAs	0.02	NA	NA	NA	NA	NA	NA	11	9,700	11	9,700	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Cedar Rapids MSA	1,565	13.61	0.28	0.06	16.64	15.08	51.49	47.28	31.58	37.57	3.61	0.00	3.93	3.47	3.70
Limited Review:															
Ames MSA	432	3.76	3.30	1.16	6.42	6.48	72.72	75.69	17.55	16.67	7.32	13.33	7.41	6.66	9.59
Des Moines-West Des Moines MSA	4,571	39.77	2.46	1.47	18.57	12.93	46.07	42.73	32.90	42.88	7.59	9.58	8.39	7.54	7.35
Dubuque MSA	380	3.31	3.80	4.21	14.18	17.11	59.13	57.37	22.89	21.32	2.27	1.75	1.43	2.47	2.30
Iowa City MSA	838	7.29	0.00	0.00	10.29	10.38	64.26	65.63	25.45	23.99	2.43	0.00	2.34	2.53	2.20
Sioux City MSA 2012-2013	302	2.63	0.24	0.33	15.63	7.95	53.91	54.64	30.22	37.09	10.81	16.67	7.14	11.81	10.20
Sioux City MSA 2014-2015	150	1.30	0.24	0.00	15.63	10.67	59.98	62.67	24.16	26.67	5.87	0.00	6.21	6.05	5.43
Waterloo-Cedar Falls MSA	671	5.84	3.10	1.79	15.98	10.43	59.07	62.74	21.85	25.04	3.69	9.80	2.79	3.85	3.34
IA NonMSA Total 2012-2013	1,655	14.40	0.00	0.00	9.92	9.73	74.36	74.62	15.71	15.65	12.45	0.00	17.73	12.78	9.29
IA NonMSA Total 2014-2015	931	8.10	0.00	0.00	9.21	9.99	73.94	72.82	16.85	17.19	6.43	0.00	7.54	6.62	5.46

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Institution ID: USBNA

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cedar Rapids MSA	171	11.96	0.28	0.58	16.64	15.20	51.49	39.77	31.58	44.44	7.03	0.00	7.79	6.01	8.11
Limited Review:															
Ames MSA	60	4.20	3.30	0.00	6.42	3.33	72.72	76.67	17.55	20.00	6.87	0.00	0.00	7.06	9.76
Des Moines-West Des Moines MSA	401	28.04	2.46	2.00	18.57	14.21	46.07	42.89	32.90	40.90	6.48	12.50	5.98	5.28	8.10
Dubuque MSA	34	2.38	3.80	5.88	14.18	26.47	59.13	50.00	22.89	17.65	13.21	0.00	21.05	14.55	8.00
Iowa City MSA	91	6.36	0.00	0.00	10.29	6.59	64.26	63.74	25.45	29.67	5.34	0.00	0.00	6.07	5.88
Sioux City MSA 2012-2013	24	1.68	0.24	0.00	15.63	12.50	53.91	62.50	30.22	25.00	4.35	0.00	3.03	3.95	5.41
Sioux City MSA 2014-2015	21	1.47	0.24	0.00	15.63	4.76	59.98	52.38	24.16	42.86	4.08	0.00	2.63	3.17	6.59
Waterloo-Cedar Falls MSA	82	5.73	3.10	3.66	15.98	12.20	59.07	57.32	21.85	26.83	3.25	15.79	1.52	3.17	2.42
IA NonMSA Total 2012-2013	324	22.66	0.00	0.00	9.92	9.26	74.36	78.09	15.71	12.65	19.55	0.00	17.14	21.66	12.14
IA NonMSA Total 2014-2015	222	15.52	0.00	0.00	9.21	9.46	73.94	76.58	16.85	13.96	11.70	0.00	13.92	12.71	8.33

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cedar Rapids MSA	2,383	17.01	0.28	0.04	16.64	11.08	51.49	44.10	31.58	44.78	5.73	0.00	9.29	4.68	5.93
Limited Review:															
Ames MSA	388	2.77	3.30	1.03	6.42	6.19	72.72	72.68	17.55	20.10	5.97	0.00	14.00	5.89	4.46
Des Moines-West Des Moines MSA	4,690	33.47	2.46	1.71	18.57	9.30	46.07	43.65	32.90	45.35	7.44	12.58	8.21	7.36	7.14
Dubuque MSA	343	2.45	3.80	2.62	14.18	15.16	59.13	58.02	22.89	24.20	2.27	3.77	1.61	2.98	1.18
Iowa City MSA	2,010	14.35	0.00	0.00	10.29	7.71	64.26	60.00	25.45	32.29	5.14	0.00	7.66	4.50	5.88
Sioux City MSA 2012-2013	295	2.11	0.24	0.34	15.63	9.15	53.91	49.15	30.22	41.36	6.47	25.00	7.59	7.07	5.38
Sioux City MSA 2014-2015	79	0.56	0.24	1.27	15.63	8.86	59.98	60.76	24.16	29.11	5.07	0.00	4.88	5.60	4.20
Waterloo-Cedar Falls MSA	992	7.08	3.10	0.50	15.98	5.34	59.07	56.05	21.85	38.10	4.52	2.78	4.28	4.88	3.93
IA NonMSA Total 2012-2013	2,150	15.35	0.00	0.00	9.92	6.88	74.36	69.63	15.71	23.49	9.49	0.00	11.09	9.26	9.82
IA NonMSA Total 2014-2015	681	4.86	0.00	0.00	9.21	8.08	73.94	71.51	16.85	20.41	7.65	0.00	8.93	7.85	6.68

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Cedar Rapids MSA	6	6.12	3.33	0.00	28.68	33.33	57.90	33.33	10.09	33.33	4.17	0.00	0.00	0.00	40.00
Limited Review:															
Ames MSA	5	5.10	15.65	0.00	10.60	0.00	66.04	100.00	7.71	0.00	0.00	0.00	0.00	0.00	0.00
Des Moines-West Des Moines MSA	28	28.57	14.33	3.57	27.96	17.86	34.87	71.43	22.85	7.14	3.51	0.00	9.52	4.65	0.00
Dubuque MSA	2	2.04	26.26	0.00	16.61	0.00	53.06	100.00	4.08	0.00	4.76	0.00	0.00	11.11	0.00
Iowa City MSA	4	4.08	0.00	0.00	31.37	25.00	56.86	50.00	11.77	25.00	0.00	0.00	0.00	0.00	0.00
Sioux City MSA 2012-2013	0	0.00	8.17	0.00	22.43	0.00	50.89	0.00	18.51	0.00	0.00	0.00	0.00	0.00	0.00
Sioux City MSA 2014-2015	2	2.04	8.17	50.00	22.43	0.00	60.43	50.00	8.97	0.00	5.26	25.00	0.00	0.00	0.00
Waterloo-Cedar Falls MSA	20	20.41	11.13	10.00	11.42	0.00	43.64	70.00	33.81	20.00	10.53	0.00	0.00	10.53	18.18
IA NonMSA Total 2012-2013	11	11.22	0.00	0.00	16.24	0.00	68.90	90.91	14.86	9.09	10.71	0.00	0.00	12.82	10.00
IA NonMSA Total 2014-2015	20	20.41	0.00	0.00	16.10	5.00	67.59	95.00	16.30	0.00	10.81	0.00	12.50	11.48	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF IOWA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cedar Rapids MSA	2,455	12.35	5.26	4.89	19.84	24.52	45.40	41.47	29.50	29.12	20.23	28.00	21.13	18.35	20.45
Limited Review:															
Ames MSA	800	4.02	10.59	13.38	5.50	6.63	67.37	63.50	15.73	16.50	17.74	18.07	26.92	17.91	12.55
Des Moines-West Des Moines MSA	5,336	26.85	10.63	10.55	15.47	17.58	41.11	40.33	32.69	31.54	14.76	17.96	18.25	14.54	13.32
Dubuque MSA	877	4.41	14.74	13.11	9.57	10.38	51.72	48.12	23.96	28.39	16.84	10.50	25.53	17.71	16.38
Iowa City MSA	1,286	6.47	0.00	0.00	16.84	16.64	58.89	57.85	24.28	25.51	10.10	0.00	10.89	9.37	11.56
Sioux City MSA 2012-2013	526	2.65	2.28	2.47	28.93	38.97	40.98	34.03	27.81	24.52	25.31	23.81	27.87	25.88	24.73
Sioux City MSA 2014-2015	396	1.99	2.08	3.28	29.92	32.58	44.15	37.37	23.85	26.77	16.91	25.00	17.46	15.47	18.75
Waterloo-Cedar Falls MSA	1,690	8.50	7.37	5.50	18.61	16.98	52.88	52.54	21.14	24.97	27.51	22.22	25.31	29.37	27.22
IA NonMSA Total 2012-2013	3,238	16.29	0.00	0.00	10.49	10.25	74.06	74.61	15.45	15.13	26.28	0.00	24.29	27.22	23.94
IA NonMSA Total 2014-2015	3,272	16.46	0.00	0.00	10.62	11.12	73.54	71.67	15.84	17.21	21.13	0.00	24.05	20.56	21.88

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF IOWA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cedar Rapids MSA	523	10.20	0.07	0.00	6.58	7.84	62.88	83.17	30.47	8.99	28.74	0.00	61.54	31.00	14.89
Limited Review:															
Ames MSA	155	3.02	2.85	0.00	3.45	2.58	74.96	62.58	18.29	34.84	33.01	0.00	0.00	26.09	55.17
Des Moines-West Des Moines MSA	131	2.55	1.80	1.53	7.42	3.82	64.02	65.65	26.76	29.01	16.67	100.00	20.00	13.87	24.14
Dubuque MSA	73	1.42	1.31	0.00	3.56	5.48	76.72	69.86	18.41	24.66	6.93	0.00	33.33	6.36	8.57
Iowa City MSA	209	4.07	0.00	0.00	1.89	7.66	80.11	75.12	17.99	17.22	6.24	0.00	66.67	4.02	23.19
Sioux City MSA 2012-2013	44	0.86	0.26	0.00	4.50	0.00	76.09	75.00	19.15	25.00	24.00	0.00	0.00	27.78	16.67
Sioux City MSA 2014-2015	30	0.58	0.00	0.00	5.30	0.00	77.57	70.00	17.13	30.00	6.35	0.00	0.00	4.76	23.08
Waterloo-Cedar Falls MSA	216	4.21	1.39	0.00	4.01	0.00	66.41	69.91	28.20	30.09	46.15	0.00	0.00	51.32	37.50
IA NonMSA Total 2012-2013	1,877	36.60	0.00	0.00	3.16	7.25	80.72	79.17	16.12	13.59	29.28	0.00	44.37	29.28	24.88
IA NonMSA Total 2014-2015	1,871	36.48	0.00	0.00	3.11	7.00	80.41	80.38	16.48	12.61	26.83	0.00	48.61	25.88	26.16

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Cedar Rapids MSA	1,565	13.61	17.40	17.33	19.10	26.44	23.65	24.92	39.85	31.31	2.82	3.57	2.17	2.74	3.02
Limited Review:															
Ames MSA	432	3.76	18.94	12.69	18.36	29.23	25.00	29.23	37.70	28.85	6.12	8.33	5.80	5.92	6.00
Des Moines-West Des Moines MSA	4,571	39.77	19.55	16.78	17.74	27.23	22.84	25.73	39.87	30.27	4.56	7.14	4.55	4.31	4.04
Dubuque MSA	380	3.31	17.39	12.94	20.37	29.41	23.50	32.16	38.74	25.49	2.37	0.00	2.68	4.04	1.67
Iowa City MSA	838	7.29	18.86	7.59	18.76	26.58	22.90	25.00	39.48	40.82	2.15	2.20	2.40	1.75	2.24
Sioux City MSA 2012-2013	302	2.63	20.39	14.01	18.59	24.15	21.89	29.95	39.13	31.88	8.90	9.94	8.85	12.00	6.46
Sioux City MSA 2014-2015	150	1.30	21.49	5.71	19.28	30.48	22.41	21.90	36.82	41.90	4.79	1.33	4.73	5.15	5.81
Waterloo-Cedar Falls MSA	671	5.84	22.69	14.23	18.25	26.48	23.18	25.69	35.88	33.60	2.34	3.46	1.92	2.43	2.24
IA NonMSA Total 2012-2013	1,655	14.40	18.04	14.45	18.60	32.55	23.82	26.43	39.54	26.56	6.08	7.28	6.62	7.14	4.51
IA NonMSA Total 2014-2015	931	8.10	17.76	12.65	18.39	30.80	23.64	25.60	40.21	30.95	5.95	6.14	6.67	5.05	6.00

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cedar Rapids MSA	171	11.96	17.40	12.74	19.10	17.83	23.65	24.84	39.85	44.59	7.60	7.35	7.14	4.97	10.27
Limited Review:															
Ames MSA	60	4.20	18.94	5.17	18.36	29.31	25.00	27.59	37.70	37.93	6.55	0.00	11.90	4.23	7.22
Des Moines-West Des Moines MSA	401	28.04	19.55	11.14	17.74	17.14	22.84	27.71	39.87	44.00	6.59	5.71	5.38	6.65	7.25
Dubuque MSA	34	2.38	17.39	17.65	20.37	20.59	23.50	35.29	38.74	26.47	15.22	23.08	25.00	18.52	7.50
Iowa City MSA	91	6.36	18.86	9.86	18.76	22.54	22.90	25.35	39.48	42.25	5.21	7.02	1.32	5.88	6.48
Sioux City MSA 2012-2013	24	1.68	20.39	8.70	18.59	13.04	21.89	17.39	39.13	60.87	4.52	3.70	1.72	2.20	7.46
Sioux City MSA 2014-2015	21	1.47	21.49	0.00	19.28	9.52	22.41	28.57	36.82	61.90	4.35	0.00	1.64	3.75	7.83
Waterloo-Cedar Falls MSA	82	5.73	22.69	12.82	18.25	15.38	23.18	29.49	35.88	42.31	3.43	8.33	4.00	1.60	3.05
IA NonMSA Total 2012-2013	324	22.66	18.04	10.73	18.60	24.29	23.82	25.87	39.54	39.12	19.93	20.00	18.18	20.88	20.28
IA NonMSA Total 2014-2015	222	15.52	17.76	12.21	18.39	22.54	23.64	23.00	40.21	42.25	11.88	10.89	14.06	10.86	11.76

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF IOWA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cedar Rapids MSA	2,383	17.01	17.40	13.48	19.10	21.97	23.65	25.54	39.85	39.02	5.15	6.96	6.85	3.84	4.52
Limited Review:															
Ames MSA	389	2.78	18.94	11.85	18.36	26.83	25.00	22.30	37.70	39.02	6.13	7.14	7.69	5.53	5.63
Des Moines-West Des Moines MSA	4,690	33.47	19.55	9.54	17.74	22.08	22.84	25.48	39.87	42.91	7.17	8.64	7.74	6.98	6.81
Dubuque MSA	343	2.45	17.39	12.90	20.37	20.32	23.50	31.29	38.74	35.48	2.35	5.05	2.93	1.94	1.81
Iowa City MSA	2,010	14.34	18.86	8.94	18.76	17.07	22.90	26.50	39.48	47.48	4.55	7.91	2.94	4.63	4.55
Sioux City MSA 2012-2013	295	2.11	20.39	8.86	18.59	22.14	21.89	29.15	39.13	39.85	7.31	6.25	8.04	7.41	7.12
Sioux City MSA 2014-2015	79	0.56	21.49	13.89	19.28	23.61	22.41	22.22	36.82	40.28	5.25	6.02	4.97	4.68	5.49
Waterloo-Cedar Falls MSA	992	7.08	22.69	9.46	18.25	20.83	23.18	26.28	35.88	43.43	4.36	4.66	5.07	4.75	3.66
IA NonMSA Total 2012-2013	2,150	15.34	18.04	7.89	18.60	20.57	23.82	26.40	39.54	45.14	9.55	10.40	10.37	10.01	8.75
IA NonMSA Total 2014-2015	681	4.86	17.76	8.61	18.39	22.02	23.64	26.99	40.21	42.38	7.88	9.36	8.75	7.48	7.49

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF IOWA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cedar Rapids MSA	2,455	12.35	76.86	50.02	89.33	4.81	5.87	20.23	22.39
Limited Review:									
Ames MSA	806	4.05	76.27	56.45	90.32	5.21	4.47	17.74	22.66
Des Moines-West Des Moines MSA	5,336	26.84	76.92	52.29	92.07	3.71	4.22	14.76	16.35
Dubuque MSA	877	4.41	77.69	48.80	94.87	2.51	2.62	16.84	23.35
Iowa City MSA	1,286	6.47	79.09	52.41	93.55	2.57	3.89	10.10	9.47
Sioux City MSA 2012-2013	526	2.65	71.07	56.08	94.49	1.90	3.61	25.31	30.66
Sioux City MSA 2014-2015	396	1.99	74.01	53.54	91.92	2.27	5.81	16.91	20.51
Waterloo-Cedar Falls MSA	1,690	8.50	75.84	49.47	84.50	6.27	9.23	27.51	29.86
IA NonMSA Total 2012-2013	3,238	16.29	73.69	53.58	92.96	3.71	3.34	26.28	28.90
IA NonMSA Total 2014-2015	3,272	16.46	78.14	51.38	94.25	2.93	2.81	21.13	22.63

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF IOWA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cedar Rapids MSA	523	10.20	98.41	89.29	60.99	24.28	14.72	28.74	37.93
Limited Review:									
Ames MSA	155	3.02	97.60	74.84	60.65	28.39	10.97	33.01	43.10
Des Moines-West Des Moines MSA	131	2.55	97.73	72.52	72.52	23.66	3.82	16.67	19.23
Dubuque MSA	73	1.42	98.34	83.56	73.97	20.55	5.48	6.93	9.25
Iowa City MSA	209	4.07	98.01	81.34	65.55	24.88	9.57	6.24	9.01
Sioux City MSA 2012-2013	44	0.86	98.46	93.18	43.18	45.45	11.36	24.00	51.52
Sioux City MSA 2014-2015	30	0.58	98.13	80.00	63.33	20.00	16.67	6.35	8.37
Waterloo-Cedar Falls MSA	216	4.21	98.31	63.43	50.46	25.00	24.54	46.15	62.07
IA NonMSA Total 2012-2013	1,877	36.60	99.01	78.00	59.72	26.21	14.06	29.28	35.28
IA NonMSA Total 2014-2015	1,871	36.48	98.71	74.24	62.75	24.53	12.72	26.83	33.11

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF IOWA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cedar Rapids MSA	39	10,518	60	15,775	99	26,293	10.64	0	0
Limited Review:									
Ames MSA	17	1,452	26	14,890	43	16,342	6.62	0	0
Des Moines-West Des Moines MSA	9	7,453	271	81,207	280	88,660	35.89	0	0
Dubuque MSA	16	1,922	32	9,193	48	11,115	4.50	2	4,993
Iowa City MSA	19	2,471	43	3,365	62	5,836	2.36	0	0
Sioux City MSA 2012-2013	17	2,576	15	2,374	32	4,950	2.00	1	82
Sioux City MSA 2014-2015	10	1,406	15	3,420	25	4,826	1.95	0	0
Waterloo-Cedar Falls MSA	33	2,827	86	4,839	119	7,666	3.10	0	0
IA NonMSA Total 2012-2013	89	37,025	124	12,770	213	49,795	20.16	1	356
IA NonMSA Total 2014-2015	81	13,177	110	18,268	191	31,445	12.73	2	193
Statewide:									
Qualified Investments That Serve AAs	0	0	16	90	16	90	0.04	0	0
Qualified Investments Outside AAs	1	841	10	11,052	11	11,893	NA	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF IOWA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Cedar Rapids MSA	19.68	10	11.76	10.00	20.00	50.00	20.00	0	0	0	0	0	0	1.22	17.63	51.25	29.90
Limited Review:																	
Ames MSA	5.96	4	4.71	0.00	25.00	75.00	0.00	0	0	0	0	0	0	7.88	6.61	67.74	12.04
Des Moines-West Des Moines MSA	21.74	15	17.65	13.33	33.33	46.67	6.67	0	0	0	0	0	0	4.84	21.24	43.60	30.31
Dubuque MSA	5.68	4	4.71	50.00	0.00	50.00	0.00	0	1	0	0	-1	0	7.47	15.19	56.85	20.50
Iowa City MSA	6.46	6	7.06	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	15.49	60.93	23.59
Sioux City MSA 2012-2013	2.13	3	NA	0.00	33.33	66.67	0.00	0	0	0	0	0	0	1.63	21.26	50.94	26.17
Sioux City MSA 2014-2015	2.13	3	3.53	0.00	33.33	66.67	0.00	0	0	0	0	0	0	1.63	21.26	56.90	20.20
Waterloo-Cedar Falls MSA	7.52	5	5.88	20.00	0.00	40.00	40.00	0	0	0	0	0	0	5.54	17.21	54.89	22.35
IA NonMSA Total 2012-2013	14.35	38	NA	0.00	15.79	71.05	13.16	0	0	0	0	0	0	0.00	11.62	73.27	15.11
IA NonMSA Total 2014-2015	14.35	38	44.71	0.00	15.79	71.05	13.16	0	0	0	0	0	0	0.00	10.77	73.10	16.14

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF IOWA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cedar Rapids MSA	19.68	10	11.76	10.00	20.00	50.00	20.00	16	10.06	25.00	25.00	43.75	6.25	1.22	17.63	51.25	29.90
Limited Review:																	
Ames MSA	5.96	4	4.71	0.00	25.00	75.00	0.00	15	9.43	13.33	6.67	40.00	0.00	7.88	6.61	67.74	12.04
Des Moines-West Des Moines MSA	21.74	15	17.65	13.33	33.33	46.67	6.67	49	30.82	16.33	30.61	42.86	10.20	4.84	21.24	43.60	30.31
Dubuque MSA	5.68	4	4.71	50.00	0.00	50.00	0.00	4	2.52	50.00	0.00	50.00	0.00	7.47	15.19	56.85	20.50
Iowa City MSA	6.46	6	7.06	0.00	33.33	66.67	0.00	11	6.92	0.00	45.45	45.45	9.09	0.00	15.49	60.93	23.59
Sioux City MSA 2012-2013	2.13	3	NA	0.00	33.33	66.67	0.00	6	NA	0.00	66.67	33.33	0.00	1.63	21.26	50.94	26.17
Sioux City MSA 2014-2015	2.13	3	3.53	0.00	33.33	66.67	0.00	3	1.89	0.00	33.33	66.67	0.00	1.63	21.26	56.90	20.20
Waterloo-Cedar Falls MSA	7.52	5	5.88	20.00	0.00	40.00	40.00	8	5.03	12.50	25.00	25.00	37.50	5.54	17.21	54.89	22.35
IA NonMSA Total 2012-2013	14.35	38	NA	0.00	15.79	71.05	13.16	58	NA	0.00	13.79	74.14	12.07	0.00	11.62	73.27	15.11
IA NonMSA Total 2014-2015	14.35	38	44.71	0.00	15.79	71.05	13.16	53	33.33	0.00	15.09	67.92	16.98	0.00	10.77	73.10	16.14

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF KANSAS												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Lawrence MSA	43.10	1,021	165,484	1,120	39,411	18	567	9	3,700	2,168	209,162	59.90
Limited Review:												
Topeka MSA	49.98	1,422	162,158	1,076	32,671	13	308	3	4,000	2,514	199,137	36.71
KS NonMSA (Pittsburg)	6.86	141	12,912	198	6,005	6	330	0	0	345	19,247	3.40
Statewide:												
CD Loans That Serve AAs	0.06	NA	NA	NA	NA	NA	NA	3	5,000	3	5,000	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF KANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Lawrence MSA	369	30.00	2.25	2.98	16.14	16.80	50.96	53.12	30.65	27.10	5.19	5.33	5.28	5.44	4.70
Limited Review:															
Topeka MSA	808	65.69	5.35	2.48	19.69	19.06	38.32	45.17	36.64	33.29	7.69	8.89	12.03	8.65	4.94
KS NonMSA (Pittsburg)	53	4.31	0.00	0.00	10.12	11.32	76.10	73.58	13.77	15.09	5.39	0.00	0.00	6.91	1.67

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: STATE OF KANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Lawrence MSA	48	41.74	2.25	4.17	16.14	25.00	50.96	58.33	30.65	12.50	7.98	0.00	8.33	10.53	4.08
Limited Review:															
Topeka MSA	50	43.48	5.35	0.00	19.69	16.00	38.32	38.00	36.64	46.00	5.49	0.00	8.82	5.32	4.85
KS NonMSA (Pittsburg)	17	14.78	0.00	0.00	10.12	5.88	76.10	58.82	13.77	35.29	8.33	0.00	0.00	8.82	16.67

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF KANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Lawrence MSA	600	48.62	2.25	3.50	16.14	13.00	50.96	51.33	30.65	32.17	5.28	16.22	2.59	5.15	5.76
Limited Review:															
Topeka MSA	564	45.71	5.35	2.13	19.69	15.43	38.32	40.07	36.64	42.38	5.13	13.04	8.37	4.45	4.23
KS NonMSA (Pittsburg)	70	5.67	0.00	0.00	10.12	7.14	76.10	81.43	13.77	11.43	5.02	0.00	4.55	5.96	2.17

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF KANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Lawrence MSA	4	80.00	19.69	50.00	18.15	25.00	42.99	25.00	19.17	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Topeka MSA	0	0.00	20.75	0.00	29.03	0.00	37.52	0.00	12.70	0.00	0.00	0.00	0.00	0.00	0.00
KS NonMSA (Pittsburg)	1	20.00	0.00	0.00	28.47	0.00	39.27	100.00	32.25	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF KANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Lawrence MSA	1,120	46.78	7.04	4.46	23.40	27.68	43.19	43.48	26.37	24.38	18.98	15.22	21.60	19.37	17.61
Limited Review:															
Topeka MSA	1,076	44.95	18.94	15.33	16.60	15.43	37.64	35.41	26.82	33.83	14.75	14.86	14.05	11.41	19.84
KS NonMSA (Pittsburg)	198	8.27	0.00	0.00	25.56	28.28	59.12	59.60	15.32	12.12	13.29	0.00	16.13	12.50	13.85

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF KANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Lawrence MSA	18	48.65	1.89	0.00	9.78	5.56	45.11	5.56	43.22	88.89	11.11	0.00	10.00	0.00	18.18
Limited Review:															
Topeka MSA	13	35.14	1.66	0.00	7.26	0.00	34.44	7.69	56.64	92.31	31.25	0.00	0.00	33.33	30.77
KS NonMSA (Pittsburg)	6	16.22	0.00	0.00	5.28	0.00	86.59	50.00	8.13	50.00	0.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF KANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Lawrence MSA	369	30.00	21.60	8.85	16.23	20.38	21.87	26.92	40.30	43.85	4.60	5.63	3.46	5.38	4.58
Limited Review:															
Topeka MSA	808	65.69	21.95	10.74	16.53	26.67	22.24	31.48	39.28	31.11	3.11	1.36	3.16	4.76	2.26
KS NonMSA (Pittsburg)	53	4.31	20.01	5.41	20.53	32.43	21.00	29.73	38.46	32.43	3.86	0.00	8.33	2.63	3.10

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF KANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Lawrence MSA	48	41.74	21.60	15.91	16.23	15.91	21.87	20.45	40.30	47.73	8.67	13.33	8.70	11.43	6.49
Limited Review:															
Topeka MSA	50	43.48	21.95	8.51	16.53	23.40	22.24	29.79	39.28	38.30	6.07	0.00	8.89	6.25	5.71
KS NonMSA (Pittsburg)	17	14.78	20.01	0.00	20.53	23.53	21.00	41.18	38.46	35.29	9.09	0.00	8.33	23.08	0.00

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF KANSAS															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Lawrence MSA	600	48.62	21.60	9.34	16.23	24.48	21.87	25.52	40.30	40.66	5.79	9.76	6.13	6.64	4.63
Limited Review:															
Topeka MSA	564	45.71	21.95	10.23	16.53	25.45	22.24	26.82	39.28	37.50	5.10	8.00	8.50	3.62	3.74
KS NonMSA (Pittsburg)	70	5.67	20.01	9.38	20.53	18.75	21.00	28.13	38.46	43.75	6.32	7.14	7.41	5.66	6.25

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF KANSAS									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Lawrence MSA	1,120	46.78	77.69	58.04	93.30	2.59	4.11	18.98	21.50
Limited Review:									
Topeka MSA	1,076	44.95	73.68	60.32	95.54	1.21	3.25	14.75	23.49
KS NonMSA (Pittsburg)	198	8.27	72.41	53.54	95.45	1.52	3.03	13.29	15.64

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF KANSAS Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Lawrence MSA	18	48.65	96.53	83.33	94.44	5.56	0.00	11.11	20.00
Limited Review:									
Topeka MSA	13	35.14	98.34	92.31	92.31	7.69	0.00	31.25	62.50
KS NonMSA (Pittsburg)	6	16.22	99.19	33.33	100.00	0.00	0.00	0.00	0.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF KANSAS Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Lawrence MSA	32	4,598	27	4,499	59	9,097	56.64	0	0
Limited Review:									
Topeka MSA	18	1,033	36	4,844	54	5,877	36.59	1	11
KS NonMSA (Pittsburg)	3	658	3	418	6	1,076	6.70	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	1	10	1	10	0.06	0	0
Qualified Investments Outside AAs	0	0	79	23,908	79	23,908	NA	1	25

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF KANSAS																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Lawrence MSA	59.90	5	33.33	20.00	20.00	60.00	0.00	0	0	0	0	0	0	8.96	20.19	48.38	22.46
Limited Review:																	
Topeka MSA	36.71	9	60.00	33.33	0.00	33.33	33.33	0	0	0	0	0	0	10.67	22.77	35.97	30.59
KS NonMSA (Pittsburg)	3.40	1	6.67	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	11.76	69.19	19.06

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Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF KANSAS																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Lawrence MSA	59.90	5	33.33	20.00	20.00	60.00	0.00	12	48.00	25.00	16.67	50.00	8.33	8.96	20.19	48.38	22.46
Limited Review:																	
Topeka MSA	36.71	9	60.00	33.33	0.00	33.33	33.33	12	48.00	25.00	0.00	41.67	33.33	10.67	22.77	35.97	30.59
KS NonMSA (Pittsburg)	3.40	1	6.67	0.00	100.00	0.00	0.00	1	4.00	0.00	100.00	0.00	0.00	0.00	11.76	69.19	19.06

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF KENTUCKY												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Bowling Green MSA 2012-2013	8.31	1,370	213,589	757	50,716	32	3,297	4	18,381	2,163	285,983	7.21
Bowling Green MSA 2014-2015	6.75	856	129,130	841	36,766	59	3,819	0	0	1,756	169,715	7.82
Limited Review:												
Evansville MSA	0.81	77	8,492	123	1,405	12	88	0	0	212	9,985	0.84
Lexington-Fayette MSA	13.44	1,802	293,138	1,654	51,628	39	2,021	3	9,432	3,498	356,219	5.94
Owensboro MSA	10.83	1,689	195,087	1,067	42,591	59	3,277	4	22,767	2,819	263,722	20.50
KY NonMSA Total 2012-2013	35.18	4,656	493,744	4,198	127,477	302	13,426	3	2,450	9,159	637,097	29.15
KY NonMSA Total 2014-2015	24.68	2,208	235,180	3,798	108,445	418	13,592	1	26,335	6,425	383,552	28.53
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	1	812	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

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Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF KENTUCKY Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Bowling Green MSA 2012-2013	477	10.55	3.93	3.56	3.32	4.19	48.42	38.78	44.33	53.46	13.02	20.59	17.02	10.21	14.81
Bowling Green MSA 2014-2015	479	10.59	3.21	2.09	6.23	2.71	51.72	37.79	38.84	57.41	10.63	1.89	6.20	8.44	13.60
Limited Review:															
Evansville MSA	37	0.82	9.94	5.41	17.34	16.22	56.59	62.16	16.13	16.22	1.77	2.38	1.52	1.46	2.86
Lexington-Fayette MSA	788	17.42	6.55	4.06	17.86	13.32	33.59	35.91	42.00	46.70	3.50	3.95	3.26	3.61	3.45
Owensboro MSA	906	20.03	2.16	1.55	6.77	8.06	71.30	64.57	19.77	25.83	8.59	12.12	5.66	8.62	9.31
KY NonMSA Total 2012-2013	1,050	23.21	0.45	0.29	12.85	8.19	48.54	41.62	38.16	49.90	8.03	25.00	9.55	6.99	8.84
KY NonMSA Total 2014-2015	786	17.38	0.46	0.13	13.70	10.56	46.85	43.38	38.99	45.93	5.92	0.00	9.02	5.83	5.48

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF KENTUCKY Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Bowling Green MSA 2012-2013	52	5.57	3.93	0.00	3.32	1.92	48.42	38.46	44.33	59.62	11.44	0.00	33.33	8.42	15.05
Bowling Green MSA 2014-2015	51	5.46	3.21	1.96	6.23	3.92	51.72	45.10	38.84	49.02	14.59	25.00	0.00	11.49	17.98
Limited Review:															
Evansville MSA	4	0.43	9.94	0.00	17.34	0.00	56.59	100.00	16.13	0.00	1.19	0.00	0.00	2.56	0.00
Lexington-Fayette MSA	39	4.18	6.55	10.26	17.86	17.95	33.59	33.33	42.00	38.46	2.44	3.45	0.00	3.33	2.52
Owensboro MSA	94	10.06	2.16	2.13	6.77	7.45	71.30	67.02	19.77	23.40	8.72	0.00	23.08	8.46	6.67
KY NonMSA Total 2012-2013	370	39.61	0.45	0.00	12.85	14.86	48.54	56.22	38.16	28.92	15.87	0.00	14.06	17.18	14.36
KY NonMSA Total 2014-2015	324	34.69	0.46	0.31	13.70	13.27	46.85	57.41	38.99	29.01	17.07	50.00	18.71	18.15	14.29

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF KENTUCKY															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Bowling Green MSA 2012-2013	834	11.64	3.93	0.72	3.32	1.68	48.42	40.29	44.33	57.31	15.05	1.43	12.50	14.06	16.68
Bowling Green MSA 2014-2015	325	4.54	3.21	1.23	6.23	2.46	51.72	44.62	38.84	51.69	14.37	5.00	6.78	14.96	15.00
Limited Review:															
Evansville MSA	36	0.50	9.94	2.78	17.34	22.22	56.59	61.11	16.13	13.89	1.42	0.00	1.35	1.75	1.18
Lexington-Fayette MSA	965	13.47	6.55	3.83	17.86	12.85	33.59	32.12	42.00	51.19	3.57	2.08	2.97	3.37	4.06
Owensboro MSA	687	9.59	2.16	1.46	6.77	5.68	71.30	70.74	19.77	22.13	10.36	0.00	7.25	11.82	8.30
KY NonMSA Total 2012-2013	3,230	45.08	0.45	0.22	12.85	10.09	48.54	46.28	38.16	43.41	16.68	11.11	25.81	17.93	14.13
KY NonMSA Total 2014-2015	1,088	15.18	0.46	0.09	13.70	10.66	46.85	48.53	38.99	40.72	14.85	0.00	18.65	16.28	13.05

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF KENTUCKY Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Bowling Green MSA 2012-2013	7	19.44	18.54	42.86	0.93	0.00	65.60	42.86	14.93	14.29	2.70	0.00	0.00	3.70	0.00
Bowling Green MSA 2014-2015	1	2.78	17.82	0.00	1.56	0.00	66.07	100.00	14.55	0.00	3.70	0.00	0.00	6.67	0.00
Limited Review:															
Evansville MSA	0	0.00	14.79	0.00	26.01	0.00	57.71	0.00	1.49	0.00	0.00	0.00	0.00	0.00	0.00
Lexington-Fayette MSA	10	27.78	17.55	30.00	37.48	40.00	24.93	10.00	20.04	20.00	0.00	0.00	0.00	0.00	0.00
Owensboro MSA	2	5.56	10.54	0.00	12.17	0.00	63.82	100.00	13.47	0.00	0.00	0.00	0.00	0.00	0.00
KY NonMSA Total 2012-2013	6	16.67	4.83	0.00	11.97	33.33	47.91	50.00	35.30	16.67	6.82	0.00	28.57	5.56	0.00
KY NonMSA Total 2014-2015	10	27.78	4.88	0.00	12.77	10.00	46.62	40.00	35.73	50.00	17.50	0.00	16.67	6.25	29.41

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF KENTUCKY															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bowling Green MSA 2012-2013	757	6.09	13.34	12.95	2.04	1.45	49.12	44.91	35.50	40.69	26.59	33.11	16.67	24.29	27.95
Bowling Green MSA 2014-2015	841	6.76	11.31	9.39	4.30	4.28	50.01	46.85	34.38	39.48	21.47	24.31	34.55	21.26	19.83
Limited Review:															
Evansville MSA	123	0.99	20.32	21.14	21.27	14.63	45.43	51.22	12.98	13.01	4.55	0.87	2.31	7.20	5.26
Lexington-Fayette MSA	1,654	13.30	10.24	14.63	21.54	18.02	32.47	29.75	35.76	37.61	7.72	10.91	6.89	7.58	6.86
Owensboro MSA	1,067	8.58	9.77	7.22	9.36	8.43	60.39	65.70	20.48	18.65	15.61	13.07	12.43	16.08	16.72
KY NonMSA Total 2012-2013	4,198	33.75	1.99	2.48	11.74	12.55	49.51	49.62	36.76	35.35	32.81	34.27	36.67	34.30	30.13
KY NonMSA Total 2014-2015	3,798	30.54	1.88	1.87	12.38	15.22	48.22	46.58	37.52	36.33	26.02	25.38	34.14	26.00	23.64

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF KENTUCKY															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bowling Green MSA 2012-2013	32	3.47	3.57	0.00	1.43	0.00	51.87	62.50	43.14	37.50	26.03	0.00	0.00	25.93	26.32
Bowling Green MSA 2014-2015	59	6.41	1.59	3.39	5.57	1.69	59.55	71.19	33.28	23.73	19.18	100.00	10.00	18.00	22.86
Limited Review:															
Evansville MSA	12	1.30	3.27	16.67	6.07	0.00	68.69	66.67	21.96	16.67	4.17	50.00	0.00	3.61	4.55
Lexington-Fayette MSA	39	4.23	5.90	5.13	13.21	5.13	37.34	33.33	43.56	56.41	11.43	0.00	0.00	7.41	14.29
Owensboro MSA	59	6.41	0.78	0.00	1.71	0.00	80.25	100.00	17.26	0.00	4.64	0.00	0.00	5.03	0.00
KY NonMSA Total 2012-2013	302	32.79	0.53	0.33	6.26	12.58	49.57	58.61	43.64	28.48	19.25	25.00	23.61	20.25	16.45
KY NonMSA Total 2014-2015	418	45.39	0.37	0.72	6.42	7.89	47.98	57.18	45.23	34.21	26.03	33.33	18.33	30.14	21.91

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF KENTUCKY Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Bowling Green MSA 2012-2013	477	10.55	21.50	19.35	16.44	20.00	18.94	23.23	43.11	37.42	10.39	19.08	9.04	9.02	10.14
Bowling Green MSA 2014-2015	479	10.59	21.08	11.03	15.98	22.06	19.60	18.15	43.33	48.75	8.15	12.70	8.22	5.25	8.93
Limited Review:															
Evansville MSA	37	0.82	26.71	10.71	18.95	25.00	19.22	42.86	35.12	21.43	1.49	1.37	1.50	1.30	1.70
Lexington-Fayette MSA	788	17.42	22.57	10.48	15.16	22.18	18.94	26.61	43.33	40.73	1.42	1.61	1.26	1.57	1.37
Owensboro MSA	906	20.03	21.42	13.43	16.24	29.85	23.36	28.36	38.98	28.36	7.76	5.52	7.08	8.04	8.67
KY NonMSA Total 2012-2013	1,050	23.21	19.89	4.91	15.75	17.54	18.78	26.90	45.58	50.64	7.74	5.54	6.96	7.80	8.26
KY NonMSA Total 2014-2015	786	17.38	19.96	5.26	15.83	17.66	18.69	27.45	45.52	49.64	6.51	7.98	5.58	6.64	6.68

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF KENTUCKY Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Bowling Green MSA 2012-2013	52	5.57	21.50	12.00	16.44	20.00	18.94	26.00	43.11	42.00	11.64	22.73	9.38	10.00	10.59
Bowling Green MSA 2014-2015	51	5.46	21.08	12.00	15.98	20.00	19.60	24.00	43.33	44.00	15.66	33.33	12.12	15.79	12.99
Limited Review:															
Evansville MSA	4	0.43	26.71	25.00	18.95	50.00	19.22	0.00	35.12	25.00	1.22	0.00	6.25	0.00	0.00
Lexington-Fayette MSA	39	4.18	22.57	14.29	15.16	14.29	18.94	31.43	43.33	40.00	2.74	2.50	3.08	2.70	2.68
Owensboro MSA	94	10.06	21.42	8.79	16.24	15.38	23.36	25.27	38.98	50.55	8.84	9.09	6.90	8.89	9.41
KY NonMSA Total 2012-2013	370	39.61	19.89	8.06	15.75	17.22	18.78	25.83	45.58	48.89	15.69	10.08	17.84	16.06	15.86
KY NonMSA Total 2014-2015	324	34.69	19.96	6.90	15.83	18.81	18.69	23.20	45.52	51.10	17.43	14.29	17.92	16.53	18.33

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF KENTUCKY															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Bowling Green MSA 2012-2013	834	11.64	21.50	6.73	16.44	15.33	18.94	24.49	43.11	53.46	13.60	12.77	13.89	10.96	15.00
Bowling Green MSA 2014-2015	325	4.54	21.08	5.93	15.98	22.03	19.60	25.85	43.33	46.19	15.11	12.70	14.42	17.11	14.65
Limited Review:															
Evansville MSA	36	0.50	26.71	12.50	18.95	25.00	19.22	31.25	35.12	31.25	1.13	0.00	3.57	1.19	0.00
Lexington-Fayette MSA	965	13.47	22.57	9.88	15.16	19.76	18.94	25.72	43.33	44.63	3.45	2.43	2.49	4.66	3.45
Owensboro MSA	687	9.59	21.42	5.81	16.24	22.26	23.36	26.77	38.98	45.16	11.04	5.17	12.50	8.70	12.53
KY NonMSA Total 2012-2013	3,230	45.08	19.89	3.15	15.75	12.71	18.78	23.05	45.58	61.09	18.46	15.75	21.91	18.07	18.13
KY NonMSA Total 2014-2015	1,088	15.18	19.96	4.49	15.83	13.38	18.69	23.80	45.52	58.32	17.82	19.29	17.90	20.00	16.89

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF KENTUCKY									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Bowling Green MSA 2012-2013	757	6.09	70.38	58.65	86.26	5.02	8.72	26.59	33.19
Bowling Green MSA 2014-2015	841	6.76	76.18	60.29	91.32	3.45	5.23	21.47	26.14
Limited Review:									
Evansville MSA	123	0.99	74.99	65.04	99.19	0.81	0.00	4.55	5.82
Lexington-Fayette MSA	1,654	13.30	75.89	56.53	93.95	3.14	2.90	7.72	8.91
Owensboro MSA	1,067	8.58	74.53	66.73	91.94	3.28	4.78	15.61	20.19
KY NonMSA Total 2012-2013	4,198	33.75	72.07	62.82	94.57	2.60	2.83	32.81	43.25
KY NonMSA Total 2014-2015	3,798	30.54	76.91	56.35	95.23	2.24	2.53	26.02	30.52

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF KENTUCKY Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Bowling Green MSA 2012-2013	32	3.47	99.64	56.25	62.50	25.00	12.50	26.03	52.94
Bowling Green MSA 2014-2015	59	6.41	98.89	52.54	81.36	10.17	8.47	19.18	25.00
Limited Review:									
Evansville MSA	12	1.30	99.07	91.67	100.00	0.00	0.00	4.17	6.02
Lexington-Fayette MSA	39	4.23	95.20	61.54	82.05	10.26	7.69	11.43	18.18
Owensboro MSA	59	6.41	99.38	89.83	83.05	13.56	3.39	4.64	4.73
KY NonMSA Total 2012-2013	302	32.79	99.35	90.40	86.75	11.59	1.66	19.25	30.31
KY NonMSA Total 2014-2015	418	45.39	99.06	73.92	91.39	7.42	1.20	26.03	37.09

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF KENTUCKY Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bowling Green MSA 2012-2013	15	7,190	22	1,926	37	9,116	10.54	0	0
Bowling Green MSA 2014-2015	15	2,456	20	737	35	3,193	3.69	0	0
Limited Review:									
Evansville MSA	3	239	6	262	9	501	0.58	0	0
Lexington-Fayette MSA	30	2,826	79	12,503	109	15,329	17.72	1	6,026
Owensboro MSA	26	4,843	33	3,446	59	8,289	9.58	0	0
KY NonMSA Total 2012-2013	101	21,904	74	3,480	175	25,384	29.34	2	2,687
KY NonMSA Total 2014-2015	82	18,116	69	6,500	151	24,616	28.45	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	5	85	5	85	0.10	0	0
Qualified Investments Outside AAs	3	2,372	122	12,254	125	14,626	NA	1	8

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF KENTUCKY																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Bowling Green MSA 2012-2013	7.21	6	NA	16.67	0.00	66.67	16.67	0	0	0	0	0	0	13.02	3.86	47.97	35.15
Bowling Green MSA 2014-2015	7.82	9	12.33	22.22	0.00	66.67	11.11	1	0	1	0	0	0	11.08	6.65	50.42	31.85
Limited Review:																	
Evansville MSA	0.84	1	1.37	0.00	0.00	100.00	0.00	0	0	0	0	0	0	13.57	19.86	52.23	14.34
Lexington-Fayette MSA	5.94	6	8.22	33.33	16.67	16.67	33.33	0	0	0	0	0	0	13.77	22.70	29.65	33.88
Owensboro MSA	20.50	8	10.96	12.50	0.00	62.50	25.00	0	1	0	0	-1	0	4.76	9.30	68.72	17.22
KY NonMSA Total 2012-2013	29.15	51	NA	3.92	15.69	58.82	21.57	0	0	0	0	0	0	1.30	13.51	48.47	36.73
KY NonMSA Total 2014-2015	28.53	49	67.12	4.08	14.29	57.14	24.49	0	0	0	0	0	0	1.34	14.45	46.76	37.44

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF KENTUCKY																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bowling Green MSA 2012-2013	7.21	6	NA	16.67	0.00	66.67	16.67	23	NA	17.39	0.00	73.91	8.70	13.02	3.86	47.97	35.15
Bowling Green MSA 2014-2015	7.82	9	12.33	22.22	0.00	66.67	11.11	24	22.86	12.50	4.17	66.67	16.67	11.08	6.65	50.42	31.85
Limited Review:																	
Evansville MSA	0.84	1	1.37	0.00	0.00	100.00	0.00	2	1.90	0.00	50.00	50.00	0.00	13.57	19.86	52.23	14.34
Lexington-Fayette MSA	5.94	6	8.22	33.33	16.67	16.67	33.33	7	6.67	42.86	14.29	14.29	28.57	13.77	22.70	29.65	33.88
Owensboro MSA	20.50	8	10.96	12.50	0.00	62.50	25.00	12	11.43	8.33	0.00	58.33	33.33	4.76	9.30	68.72	17.22
KY NonMSA Total 2012-2013	29.15	51	NA	3.92	15.69	58.82	21.57	67	NA	1.49	16.42	61.19	20.90	1.30	13.51	48.47	36.73
KY NonMSA Total 2014-2015	28.53	49	67.12	4.08	14.29	57.14	24.49	60	57.14	1.67	15.00	58.33	25.00	1.34	14.45	46.76	37.44

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF MINNESOTA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Duluth MSA	21.25	3,904	569,784	3,664	57,611	50	433	4	4,511	7,622	632,339	25.03
Limited Review:												
Mankato-North Mankato MSA	6.03	820	158,283	1,309	84,771	32	2,622	0	0	2,161	245,676	9.55
Rochester MSA 2012-2013	6.48	1,423	259,721	891	45,059	9	1,237	0	0	2,323	306,017	8.05
Rochester MSA 2014-2015	5.86	1,089	191,832	986	36,574	25	848	0	0	2,100	229,254	8.05
St. Cloud MSA	16.12	2,832	438,503	2,888	102,245	58	935	3	2,140	5,781	543,823	15.01
MN NonMSA Total 2012-2013	25.92	5,513	858,042	3,629	80,935	151	17,636	3	2,677	9,296	959,290	17.37
MN NonMSA Total 2014-2015	18.34	2,772	422,710	3,496	62,053	308	18,984	1	545	6,577	504,292	16.95
Statewide:												
CD Loans That Serve AAs	0.01	NA	NA	NA	NA	NA	NA	4	9,123	4	9,123	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	5	1,991	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Duluth MSA	1,502	20.24	3.03	8.59	10.59	9.59	65.42	53.60	20.95	28.23	10.82	26.32	9.97	9.44	12.12
Limited Review:															
Mankato-North Mankato MSA	369	4.97	0.00	0.00	11.23	14.36	76.09	75.34	12.67	10.30	8.66	0.00	10.43	8.61	6.77
Rochester MSA 2012-2013	697	9.39	0.00	0.00	14.68	13.63	54.39	46.63	30.93	39.74	11.73	0.00	9.83	11.30	13.07
Rochester MSA 2014-2015	838	11.29	0.00	0.00	8.04	10.38	61.03	57.40	30.93	32.22	12.24	0.00	14.69	12.74	10.85
St. Cloud MSA	1,112	14.98	0.00	0.00	12.52	16.37	79.97	69.60	7.51	14.03	9.23	0.00	13.38	8.20	12.78
MN NonMSA Total 2012-2013	1422	19.16	0.68	0.14	12.89	12.66	74.71	73.49	11.71	13.71	10.81	6.06	10.31	10.97	10.57
MN NonMSA Total 2014-2015	1481	19.96	0.72	1.35	11.73	11.48	75.26	77.04	12.29	10.13	9.69	18.92	10.70	9.91	7.26

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Duluth MSA	338	34.70	3.03	2.96	10.59	9.76	65.42	62.72	20.95	24.56	14.70	25.00	16.33	14.33	13.77
Limited Review:															
Mankato-North Mankato MSA	47	4.83	0.00	0.00	11.23	4.26	76.09	80.85	12.67	14.89	10.68	0.00	0.00	13.70	5.88
Rochester MSA 2012-2013	32	3.29	0.00	0.00	14.68	9.38	54.39	50.00	30.93	40.63	4.98	0.00	5.26	4.93	4.93
Rochester MSA 2014-2015	27	2.77	0.00	0.00	8.04	0.00	61.03	44.44	30.93	55.56	2.84	0.00	0.00	1.83	4.85
St. Cloud MSA	90	9.24	0.00	0.00	12.52	4.44	79.97	85.56	7.51	10.00	10.16	0.00	7.69	11.11	0.00
MN NonMSA Total 2012-2013	238	24.44	0.68	0.00	12.89	9.66	74.71	77.31	11.71	13.03	13.59	0.00	13.68	13.67	13.33
MN NonMSA Total 2014-2015	202	20.74	0.72	0.00	11.73	8.91	75.26	73.27	12.29	17.82	11.27	0.00	10.84	9.80	20.54

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF MINNESOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Duluth MSA	2,055	20.72	3.03	2.24	10.59	8.81	65.42	58.49	20.95	30.46	12.20	10.39	12.90	11.93	12.74
Limited Review:															
Mankato-North Mankato MSA	393	3.96	0.00	0.00	11.23	12.98	76.09	72.77	12.67	14.25	8.95	0.00	8.11	9.48	6.10
Rochester MSA 2012-2013	694	7.00	0.00	0.00	14.68	11.24	54.39	44.96	30.93	43.80	7.81	0.00	7.07	7.18	8.93
Rochester MSA 2014-2015	224	2.26	0.00	0.00	8.04	7.14	61.03	59.38	30.93	33.48	7.48	0.00	6.62	8.42	6.18
St. Cloud MSA	1,621	16.34	0.00	0.00	12.52	9.44	79.97	76.37	7.51	14.19	8.12	0.00	8.55	8.24	6.75
MN NonMSA Total 2012-2013	3,848	38.79	0.68	0.23	12.89	12.19	74.71	73.75	11.71	13.83	14.48	11.36	16.96	14.14	14.48
MN NonMSA Total 2014-2015	1,085	10.94	0.72	0.28	11.73	13.09	75.26	74.65	12.29	11.98	11.25	13.33	15.75	11.06	9.10

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Duluth MSA	9	23.68	27.44	44.44	20.35	22.22	41.09	33.33	11.11	0.00	7.50	14.29	0.00	6.67	0.00
Limited Review:															
Mankato-North Mankato MSA	11	28.95	0.00	0.00	21.76	9.09	72.23	81.82	6.01	9.09	16.00	0.00	12.50	12.50	100.00
Rochester MSA 2012-2013	0	0.00	0.00	0.00	28.82	0.00	55.52	0.00	15.66	0.00	0.00	0.00	0.00	0.00	0.00
Rochester MSA 2014-2015	0	0.00	0.00	0.00	16.55	0.00	67.78	0.00	15.66	0.00	0.00	0.00	0.00	0.00	0.00
St. Cloud MSA	9	23.68	0.00	0.00	38.41	66.67	57.06	33.33	4.54	0.00	5.66	0.00	15.00	0.00	0.00
MN NonMSA Total 2012-2013	5	13.16	2.69	0.00	22.38	80.00	68.28	20.00	6.65	0.00	8.33	0.00	36.36	0.00	0.00
MN NonMSA Total 2014-2015	4	10.53	2.83	0.00	21.33	25.00	68.82	75.00	7.02	0.00	2.94	0.00	0.00	3.92	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF MINNESOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Duluth MSA	3,664	21.73	13.11	16.68	10.52	10.51	57.34	49.81	19.04	23.01	30.02	30.54	28.96	28.91	32.80
Limited Review:															
Mankato-North Mankato MSA	1,309	7.76	0.00	0.00	14.46	21.08	77.69	71.58	7.84	7.33	28.86	0.00	33.33	28.07	26.55
Rochester MSA 2012-2013	891	5.28	0.00	0.00	17.28	14.37	52.67	52.30	30.05	33.33	21.29	0.00	18.05	21.73	23.00
Rochester MSA 2014-2015	986	5.85	0.00	0.00	8.40	9.84	61.49	58.72	30.11	31.44	20.79	0.00	30.19	19.81	19.84
St. Cloud MSA	2,888	17.13	0.00	0.00	18.25	18.59	72.96	67.04	8.79	14.37	23.56	0.00	20.97	23.02	29.72
MN NonMSA Total 2012-2013	3,629	21.52	0.89	1.18	15.76	16.07	74.26	72.66	9.10	10.09	25.58	32.76	28.75	25.06	23.69
MN NonMSA Total 2014-2015	3,496	20.73	0.99	0.89	15.10	17.02	74.53	71.60	9.38	10.50	23.27	26.32	29.08	22.01	20.49

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF MINNESOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Duluth MSA	50	7.90	3.51	4.00	7.03	2.00	68.72	64.00	20.74	30.00	33.96	100.00	0.00	31.82	33.33
Limited Review:															
Mankato-North Mankato MSA	32	5.06	0.00	0.00	4.04	12.50	77.10	81.25	18.86	6.25	10.38	0.00	0.00	11.11	6.67
Rochester MSA 2012-2013	9	1.42	0.00	0.00	6.98	11.11	55.35	66.67	37.67	22.22	3.64	0.00	0.00	2.70	6.06
Rochester MSA 2014-2015	25	3.95	0.00	0.00	1.60	0.00	61.22	72.00	37.17	28.00	3.38	0.00	0.00	3.07	4.55
St. Cloud MSA	58	9.16	0.00	0.00	12.16	18.97	86.10	79.31	1.74	1.72	3.90	0.00	9.52	3.54	0.00
MN NonMSA Total 2012-2013	151	23.85	0.05	0.00	5.08	3.97	84.55	86.75	10.32	9.27	4.95	0.00	5.26	5.33	2.42
MN NonMSA Total 2014-2015	308	48.66	0.05	0.32	4.15	5.52	84.95	82.14	10.85	12.01	8.66	0.00	8.77	8.79	7.34

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Duluth MSA	1,502	20.24	19.85	13.44	17.90	24.97	22.96	23.27	39.29	38.31	8.93	7.86	8.26	8.01	10.26
Limited Review:															
Mankato-North Mankato MSA	369	4.97	18.53	11.66	20.34	25.15	24.21	26.99	36.92	36.20	5.85	2.80	3.73	6.76	9.28
Rochester MSA 2012-2013	697	9.39	16.01	13.30	18.72	29.06	23.84	19.46	41.43	38.18	7.82	5.11	7.86	5.72	10.78
Rochester MSA 2014-2015	838	11.29	15.35	10.60	17.80	20.00	23.48	24.34	43.38	45.06	6.48	5.13	4.03	6.36	9.47
St. Cloud MSA	1,112	14.98	19.07	11.70	17.04	25.19	26.14	29.26	37.74	33.84	4.00	3.32	2.97	4.34	5.46
MN NonMSA Total 2012-2013	1,422	19.16	19.20	8.09	19.16	18.65	23.65	24.26	37.99	49.01	5.01	4.13	3.62	4.77	6.39
MN NonMSA Total 2014-2015	1,481	19.96	18.90	7.61	18.98	24.05	23.50	22.15	38.62	46.19	5.01	3.98	4.53	4.66	5.83

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Duluth MSA	338	34.70	19.85	6.06	17.90	16.97	22.96	28.48	39.29	48.48	14.83	9.09	12.00	19.23	14.40
Limited Review:															
Mankato-North Mankato MSA	47	4.83	18.53	16.28	20.34	18.60	24.21	20.93	36.92	44.19	11.36	11.11	10.00	6.25	18.52
Rochester MSA 2012-2013	32	3.29	16.01	10.00	18.72	16.67	23.84	30.00	41.43	43.33	5.08	4.00	3.53	4.96	6.78
Rochester MSA 2014-2015	27	2.77	15.35	7.69	17.80	15.38	23.48	34.62	43.38	42.31	2.83	2.50	2.47	3.85	2.44
St. Cloud MSA	90	9.24	19.07	12.16	17.04	24.32	26.14	18.92	37.74	44.59	9.79	3.85	8.06	14.29	9.52
MN NonMSA Total 2012-2013	238	24.44	19.20	9.41	19.16	22.77	23.65	27.23	37.99	40.59	11.35	5.13	13.87	10.98	11.75
MN NonMSA Total 2014-2015	202	20.74	18.90	7.19	18.98	21.56	23.50	25.15	38.62	46.11	10.33	7.06	13.75	10.21	9.61

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Duluth MSA	2,055	20.72	19.85	6.37	17.90	16.87	22.96	24.93	39.29	51.83	14.24	12.32	11.02	14.05	15.74
Limited Review:															
Mankato-North Mankato MSA	393	3.96	18.53	9.30	20.34	24.71	24.21	22.97	36.92	43.02	10.26	5.88	14.06	8.63	10.40
Rochester MSA 2012-2013	694	7.00	16.01	8.93	18.72	17.22	23.84	24.08	41.43	49.76	8.04	8.00	6.49	6.75	9.55
Rochester MSA 2014-2015	224	2.26	15.35	10.50	17.80	25.00	23.48	22.00	43.38	42.50	7.51	6.48	7.85	6.78	8.07
St. Cloud MSA	1,621	16.34	19.07	8.04	17.04	22.34	26.14	27.90	37.74	41.71	6.81	5.74	7.11	5.60	7.92
MN NonMSA Total 2012-2013	3,848	38.79	19.20	7.20	19.16	16.94	23.65	25.16	37.99	50.70	11.84	10.16	11.48	10.99	12.69
MN NonMSA Total 2014-2015	1,085	10.94	18.90	7.09	18.98	17.72	23.50	25.06	38.62	50.13	10.01	8.99	10.11	9.35	10.47

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF MINNESOTA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Duluth MSA	3,664	21.73	77.98	49.15	97.95	1.06	0.98	30.02	30.53
Limited Review:									
Mankato-North Mankato MSA	1,309	7.76	75.42	42.78	87.85	4.13	8.02	28.86	30.10
Rochester MSA 2012-2013	891	5.28	74.96	42.65	89.67	4.26	6.06	21.29	15.85
Rochester MSA 2014-2015	986	5.85	80.26	41.68	92.90	2.84	4.26	20.79	14.50
St. Cloud MSA	2,888	17.13	79.80	42.73	93.70	2.22	4.09	23.56	26.21
MN NonMSA Total 2012-2013	3,629	21.52	76.32	47.86	96.34	1.96	1.71	25.58	23.64
MN NonMSA Total 2014-2015	3,496	20.73	80.46	49.89	97.37	1.20	1.43	23.27	23.37

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF MINNESOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Duluth MSA	50	7.90	98.77	66.00	100.00	0.00	0.00	33.96	36.11
Limited Review:									
Mankato-North Mankato MSA	32	5.06	98.15	50.00	78.13	9.38	12.50	10.38	20.00
Rochester MSA 2012-2013	9	1.42	98.56	55.56	44.44	55.56	0.00	3.64	3.13
Rochester MSA 2014-2015	25	3.95	98.40	36.00	88.00	8.00	4.00	3.38	3.33
St. Cloud MSA	58	9.16	98.65	43.10	96.55	3.45	0.00	3.90	4.17
MN NonMSA Total 2012-2013	151	23.85	98.88	70.20	52.98	36.42	10.60	4.95	7.16
MN NonMSA Total 2014-2015	308	48.66	98.84	59.74	80.19	12.66	7.14	8.66	11.54

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF MINNESOTA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Duluth MSA	10	3,119	121	7,650	131	10,769	17.74	1	0
Limited Review:									
Mankato-North Mankato MSA	4	1,747	23	2,593	27	4,340	7.15	0	0
Rochester MSA 2012-2013	26	3,001	28	4,476	54	7,477	12.31	1	88
Rochester MSA 2014-2015	19	2,140	22	405	41	2,545	4.19	1	38
St. Cloud MSA	12	1,256	55	3,351	67	4,607	7.59	0	0
MN NonMSA Total 2012-2013	62	13,965	87	5,138	149	19,103	31.46	1	19,015
MN NonMSA Total 2014-2015	29	3,138	86	4,760	115	7,898	13.01	0	0
Statewide:									
Qualified Investments That Serve AAs	5	3,688	15	286	20	3,974	6.55	0	0
Qualified Investments Outside AAs	3	3,325	23	50,886	26	54,211	NA	1	40

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF MINNESOTA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Duluth MSA	25.03	10	26.32	20.00	20.00	50.00	10.00	0	0	0	0	0	0	6.98	12.69	58.07	22.26
Limited Review:																	
Mankato-North Mankato MSA	9.55	3	7.89	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	13.67	72.51	13.82
Rochester MSA 2012-2013	8.05	4	NA	0.00	25.00	50.00	25.00	0	0	0	0	0	0	0.00	18.08	52.45	29.46
Rochester MSA 2014-2015	8.05	4	10.53	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	10.77	59.77	29.46
St. Cloud MSA	15.01	5	13.16	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	16.74	74.67	8.60
MN NonMSA Total 2012-2013	17.37	17	NA	5.88	35.29	52.94	5.88	0	0	0	0	0	0	0.94	14.67	73.05	11.33
MN NonMSA Total 2014-2015	16.95	16	42.11	6.25	31.25	56.25	6.25	0	0	0	0	0	0	0.99	13.45	73.65	11.92

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF MINNESOTA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Duluth MSA	25.03	10	26.32	20.00	20.00	50.00	10.00	37	29.60	13.51	10.81	54.05	21.62	6.98	12.69	58.07	22.26
Limited Review:																	
Mankato-North Mankato MSA	9.55	3	7.89	0.00	0.00	100.00	0.00	9	7.20	0.00	11.11	88.89	0.00	0.00	13.67	72.51	13.82
Rochester MSA 2012-2013	8.05	4	NA	0.00	25.00	50.00	25.00	16	NA	0.00	18.75	50.00	31.25	0.00	18.08	52.45	29.46
Rochester MSA 2014-2015	8.05	4	10.53	0.00	0.00	75.00	25.00	18	14.40	0.00	11.11	61.11	27.78	0.00	10.77	59.77	29.46
St. Cloud MSA	15.01	5	13.16	0.00	20.00	60.00	20.00	14	11.20	0.00	14.29	64.29	21.43	0.00	16.74	74.67	8.60
MN NonMSA Total 2012-2013	17.37	17	NA	5.88	35.29	52.94	5.88	49	NA	4.08	24.49	63.27	8.16	0.94	14.67	73.05	11.33
MN NonMSA Total 2014-2015	16.95	16	42.11	6.25	31.25	56.25	6.25	47	37.60	4.26	21.28	65.96	8.51	0.99	13.45	73.65	11.92

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF MISSOURI												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Springfield MSA	21.79	4,916	686,643	3,429	74,352	178	6,514	1	2,435	8,524	769,944	11.18
Limited Review:												
Cape Girardeau MSA	5.17	990	121,243	968	40,952	63	6,249	3	7,276	2,024	175,720	7.25
Columbia MSA 2012-2013	2.44	627	89,693	313	11,691	14	2,226	0	0	954	103,610	1.93
Columbia MSA 2014-2015	1.74	273	55,997	389	8,699	20	1,405	0	0	682	66,101	1.93
Fayetteville-Springdale-Rogers MSA	0.69	90	7,807	138	1,925	41	1,879	0	0	269	11,611	0.99
Jefferson City MSA	1.02	251	30,478	147	2,531	1	12	1	1,379	400	34,400	0.78
Joplin MSA	8.36	1,607	177,568	1,572	66,058	84	9,726	8	17,770	3,271	271,122	11.11
St. Joseph MSA	5.39	800	115,093	1,221	35,543	81	4,797	7	29,530	2,109	184,963	7.88
MO NonMSA Total 2012-2013	30.02	6,005	707,002	4,547	146,756	1,186	134,899	7	17,397	11,745	1,006,054	28.26
MO NonMSA Total 2014-2015	23.36	2,818	310,604	4,979	105,033	1,339	95,420	2	498	9,138	511,555	28.70
Statewide:												
CD Loans That Serve AAs	0.02	NA	NA	NA	NA	NA	NA	6	129,273	6	129,273	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	1	7,000	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF MISSOURI Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Springfield MSA	2,048	29.27	0.49	0.68	15.96	11.87	61.19	57.37	22.36	30.08	5.01	4.92	4.28	4.96	5.48
Limited Review:															
Cape Girardeau MSA	403	5.76	1.22	0.00	10.43	5.96	61.60	66.50	26.76	27.54	5.01	0.00	0.79	5.71	4.92
Columbia MSA 2012-2013	244	3.49	1.50	1.64	12.75	23.77	52.88	47.13	32.87	27.46	2.38	4.76	5.50	1.85	1.86
Columbia MSA 2014-2015	176	2.52	2.00	0.00	14.90	17.61	50.23	47.73	32.87	34.66	3.20	0.00	3.51	3.44	2.82
Fayetteville-Springdale-Rogers MSA	11	0.16	0.00	0.00	23.10	9.09	76.90	90.91	0.00	0.00	0.44	0.00	0.00	0.60	0.00
Jefferson City MSA	150	2.14	1.13	2.00	6.13	10.00	55.33	58.00	37.42	30.00	2.92	6.25	2.27	3.10	2.69
Joplin MSA	680	9.72	0.00	0.00	10.37	10.59	82.11	81.03	7.52	8.38	4.51	0.00	5.11	4.31	6.06
St. Joseph MSA	325	4.65	0.00	0.00	9.74	7.69	68.84	70.77	21.43	21.54	6.79	0.00	11.63	7.75	3.65
MO NonMSA Total 2012-2013	1,764	25.21	0.21	0.28	9.98	6.01	70.12	58.39	19.69	35.32	6.02	5.00	4.86	5.24	8.50
MO NonMSA Total 2014-2015	1,195	17.08	0.21	0.08	9.76	6.28	70.81	58.08	19.22	35.56	4.67	0.00	3.74	3.99	6.91

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF MISSOURI Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Springfield MSA	158	12.57	0.49	0.00	15.96	16.46	61.19	55.06	22.36	28.48	6.61	0.00	6.98	5.43	9.82
Limited Review:															
Cape Girardeau MSA	43	3.42	1.22	0.00	10.43	23.26	61.60	58.14	26.76	18.60	5.65	0.00	9.38	4.08	6.82
Columbia MSA 2012-2013	14	1.11	1.50	0.00	12.75	21.43	52.88	42.86	32.87	35.71	1.50	0.00	0.00	1.91	1.37
Columbia MSA 2014-2015	11	0.88	2.00	0.00	14.90	9.09	50.23	63.64	32.87	27.27	3.07	0.00	0.00	4.42	2.27
Fayetteville-Springdale-Rogers MSA	12	0.95	0.00	0.00	23.10	16.67	76.90	83.33	0.00	0.00	4.26	0.00	14.29	2.50	0.00
Jefferson City MSA	15	1.19	1.13	6.67	6.13	0.00	55.33	40.00	37.42	53.33	0.61	0.00	0.00	0.00	1.85
Joplin MSA	137	10.90	0.00	0.00	10.37	10.95	82.11	78.10	7.52	10.95	13.49	0.00	14.71	12.50	21.74
St. Joseph MSA	93	7.40	0.00	0.00	9.74	8.60	68.84	76.34	21.43	15.05	15.98	0.00	17.65	17.27	10.53
MO NonMSA Total 2012-2013	399	31.74	0.21	0.00	9.98	11.78	70.12	65.16	19.69	23.06	12.49	0.00	14.20	12.36	12.27
MO NonMSA Total 2014-2015	375	29.83	0.21	0.80	9.76	8.53	70.81	75.47	19.22	15.20	13.48	50.00	11.80	14.50	10.37

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF MISSOURI															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Springfield MSA	2,694	26.75	0.49	0.22	15.96	8.91	61.19	56.76	22.36	34.11	6.17	3.70	4.88	6.23	6.64
Limited Review:															
Cape Girardeau MSA	541	5.37	1.22	0.18	10.43	10.91	61.60	54.71	26.76	34.20	5.64	0.00	4.35	4.84	7.55
Columbia MSA 2012-2013	367	3.64	1.50	1.36	12.75	15.53	52.88	51.77	32.87	31.34	3.63	3.03	5.99	3.59	3.05
Columbia MSA 2014-2015	83	0.82	2.00	1.20	14.90	21.69	50.23	45.78	32.87	31.33	2.70	2.94	3.72	2.23	2.98
Fayetteville-Springdale-Rogers MSA	67	0.67	0.00	0.00	23.10	13.43	76.90	86.57	0.00	0.00	7.32	0.00	3.45	8.51	0.00
Jefferson City MSA	86	0.85	1.13	1.16	6.13	10.47	55.33	45.35	37.42	43.02	1.47	0.00	7.41	0.66	2.33
Joplin MSA	785	7.80	0.00	0.00	10.37	8.92	82.11	81.53	7.52	9.55	7.46	0.00	8.84	7.40	6.45
St. Joseph MSA	377	3.74	0.00	0.00	9.74	5.31	68.84	64.99	21.43	29.71	5.63	0.00	1.32	6.34	4.91
MO NonMSA Total 2012-2013	3,830	38.03	0.21	0.13	9.98	6.01	70.12	65.51	19.69	28.36	9.74	25.00	10.08	9.38	10.56
MO NonMSA Total 2014-2015	1,240	12.31	0.21	0.00	9.76	6.53	70.81	66.85	19.22	26.61	8.03	0.00	6.27	8.18	8.18

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF MISSOURI Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Springfield MSA	16	30.19	8.00	12.50	28.22	6.25	46.87	62.50	16.91	18.75	1.23	0.00	0.00	2.86	0.00
Limited Review:															
Cape Girardeau MSA	3	5.66	8.14	0.00	31.93	33.33	45.17	33.33	14.76	33.33	4.35	0.00	7.69	0.00	0.00
Columbia MSA 2012-2013	2	3.77	19.80	0.00	30.53	50.00	19.40	50.00	30.27	0.00	0.00	0.00	0.00	0.00	0.00
Columbia MSA 2014-2015	3	5.66	22.02	33.33	29.36	0.00	18.36	66.67	30.27	0.00	2.94	8.33	0.00	0.00	0.00
Fayetteville-Springdale-Rogers MSA	0	0.00	0.00	0.00	12.46	0.00	87.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Jefferson City MSA	0	0.00	12.77	0.00	41.48	0.00	28.18	0.00	17.56	0.00	0.00	0.00	0.00	0.00	0.00
Joplin MSA	5	9.43	0.00	0.00	24.74	0.00	71.98	100.00	3.28	0.00	4.35	0.00	0.00	6.25	0.00
St. Joseph MSA	5	9.43	0.00	0.00	18.54	60.00	69.32	40.00	12.14	0.00	12.50	0.00	50.00	0.00	0.00
MO NonMSA Total 2012-2013	11	20.75	0.00	0.00	11.21	9.09	63.04	54.55	25.74	36.36	9.09	0.00	10.00	5.88	18.75
MO NonMSA Total 2014-2015	8	15.09	0.00	0.00	11.45	0.00	62.91	75.00	25.63	25.00	2.44	0.00	0.00	3.57	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF MISSOURI															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield MSA	3,429	19.37	0.80	0.55	23.97	26.71	55.32	50.77	19.91	21.96	12.73	14.81	12.09	13.19	12.32
Limited Review:															
Cape Girardeau MSA	968	5.47	3.55	4.96	13.10	12.81	62.64	59.09	20.70	23.14	20.14	31.58	22.10	19.23	18.13
Columbia MSA 2012-2013	313	1.77	14.63	13.74	17.03	29.71	38.00	28.43	30.33	28.12	6.47	4.77	11.80	5.38	5.50
Columbia MSA 2014-2015	389	2.20	16.02	10.03	17.76	20.05	36.50	37.28	29.72	32.65	6.46	4.42	7.46	6.10	7.05
Fayetteville-Springdale-Rogers MSA	138	0.78	0.00	0.00	20.02	6.52	79.98	93.48	0.00	0.00	15.74	0.00	5.13	17.39	0.00
Jefferson City MSA	147	0.83	14.54	11.56	15.46	19.05	40.92	29.93	29.08	39.46	2.22	3.50	3.01	1.48	2.56
Joplin MSA	1,572	8.88	0.00	0.00	14.91	19.53	77.75	72.77	7.34	7.70	18.39	0.00	21.47	17.70	21.02
St. Joseph MSA	1,221	6.90	0.00	0.00	14.62	14.74	66.80	62.24	18.57	23.01	22.83	0.00	22.28	22.72	23.40
MO NonMSA Total 2012-2013	4,547	25.68	0.17	0.18	11.27	9.48	69.75	67.69	18.80	22.66	18.65	6.45	19.64	18.03	18.73
MO NonMSA Total 2014-2015	4,979	28.13	0.19	0.12	11.31	9.38	69.59	68.83	18.90	21.67	17.17	6.45	16.40	16.80	18.05

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF MISSOURI															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Springfield MSA	178	5.92	0.18	0.00	10.34	11.24	76.61	87.08	12.88	1.69	7.91	0.00	7.46	8.26	2.27
Limited Review:															
Cape Girardeau MSA	63	2.10	0.65	0.00	4.54	30.16	68.25	60.32	26.57	9.52	13.11	0.00	41.67	9.46	8.82
Columbia MSA 2012-2013	14	0.47	0.83	0.00	13.52	7.14	68.00	64.29	17.66	28.57	6.25	0.00	0.00	5.13	30.00
Columbia MSA 2014-2015	20	0.67	1.50	0.00	14.64	5.00	64.39	70.00	19.47	25.00	7.14	0.00	0.00	7.04	20.00
Fayetteville-Springdale-Rogers MSA	41	1.36	0.00	0.00	23.21	0.00	76.79	100.00	0.00	0.00	12.17	0.00	0.00	15.73	0.00
Jefferson City MSA	1	0.03	2.66	0.00	3.32	0.00	62.46	100.00	31.56	0.00	0.00	0.00	0.00	0.00	0.00
Joplin MSA	84	2.79	0.00	0.00	3.83	5.95	92.18	89.29	3.99	4.76	12.16	0.00	50.00	11.21	25.00
St. Joseph MSA	81	2.69	0.00	0.00	1.69	1.23	84.55	96.30	13.76	2.47	8.42	0.00	0.00	8.93	4.55
MO NonMSA Total 2012-2013	1,186	39.44	0.04	0.00	6.78	4.38	70.35	69.73	22.83	25.89	11.61	0.00	9.82	11.38	12.44
MO NonMSA Total 2014-2015	1,339	44.53	0.04	0.00	6.46	5.53	70.39	65.87	23.12	28.60	13.07	0.00	8.91	11.75	18.19

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF MISSOURI Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Springfield MSA	2,048	29.27	19.49	10.36	18.42	24.35	22.14	25.39	39.96	39.90	1.80	1.97	1.55	1.65	2.05
Limited Review:															
Cape Girardeau MSA	403	5.76	19.02	7.45	17.81	23.40	21.84	32.98	41.32	36.17	6.03	7.06	4.02	6.56	6.56
Columbia MSA 2012-2013	244	3.49	20.50	15.60	16.81	27.52	22.27	22.02	40.42	34.86	1.45	2.28	0.93	1.21	1.76
Columbia MSA 2014-2015	176	2.52	20.99	10.26	17.14	16.24	22.34	28.21	39.53	45.30	2.02	1.68	1.15	2.41	2.47
Fayetteville-Springdale-Rogers MSA	11	0.16	26.22	25.00	21.97	25.00	21.67	0.00	30.14	50.00	0.54	0.00	1.75	0.00	0.00
Jefferson City MSA	150	2.14	16.33	6.67	16.76	33.33	22.22	40.00	44.69	20.00	1.56	0.83	1.47	2.28	1.29
Joplin MSA	680	9.72	20.33	11.21	18.97	27.58	19.91	20.91	40.79	40.30	3.51	4.41	2.80	3.71	3.68
St. Joseph MSA	325	4.65	18.77	16.98	18.19	27.04	23.45	22.01	39.59	33.96	2.69	3.97	2.54	3.11	2.01
MO NonMSA Total 2012-2013	1,764	25.21	18.83	7.51	18.18	23.53	21.58	25.27	41.40	43.68	4.97	5.11	5.52	5.02	4.70
MO NonMSA Total 2014-2015	1,195	17.08	18.86	7.30	18.16	21.46	21.54	23.23	41.44	48.01	4.43	6.34	4.45	4.24	4.29

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF MISSOURI Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Springfield MSA	158	12.57	19.49	8.63	18.42	27.34	22.14	27.34	39.96	36.69	6.63	1.49	10.57	7.47	5.61
Limited Review:															
Cape Girardeau MSA	43	3.42	19.02	9.52	17.81	16.67	21.84	33.33	41.32	40.48	5.66	0.00	9.68	9.52	2.70
Columbia MSA 2012-2013	14	1.11	20.50	8.33	16.81	25.00	22.27	8.33	40.42	58.33	1.64	0.00	3.03	1.69	1.52
Columbia MSA 2014-2015	11	0.88	20.99	9.09	17.14	36.36	22.34	54.55	39.53	0.00	3.27	3.33	4.65	8.00	0.00
Fayetteville-Springdale-Rogers MSA	12	0.95	26.22	16.67	21.97	8.33	21.67	33.33	30.14	41.67	4.35	0.00	0.00	7.69	8.33
Jefferson City MSA	15	1.19	16.33	0.00	16.76	28.57	22.22	35.71	44.69	35.71	0.71	0.00	0.00	3.03	0.00
Joplin MSA	137	10.90	20.33	14.18	18.97	19.40	19.91	25.37	40.79	41.04	14.18	12.00	12.50	14.29	15.11
St. Joseph MSA	93	7.40	18.77	14.13	18.19	21.74	23.45	28.26	39.59	35.87	17.42	13.04	18.18	21.95	16.05
MO NonMSA Total 2012-2013	399	31.74	18.83	9.25	18.18	20.82	21.58	27.76	41.40	42.16	12.89	12.43	15.61	13.80	11.66
MO NonMSA Total 2014-2015	375	29.83	18.86	7.24	18.16	18.11	21.54	27.86	41.44	46.80	14.02	8.33	14.18	15.22	14.47

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF MISSOURI															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Springfield MSA	2,694	26.75	19.49	8.81	18.42	22.06	22.14	25.00	39.96	44.13	4.55	5.54	6.14	4.04	3.97
Limited Review:															
Cape Girardeau MSA	541	5.37	19.02	5.95	17.81	17.46	21.84	28.17	41.32	48.41	6.52	4.17	11.20	7.18	5.18
Columbia MSA 2012-2013	367	3.64	20.50	9.96	16.81	18.73	22.27	28.29	40.42	43.03	3.42	4.13	4.01	3.82	2.82
Columbia MSA 2014-2015	83	0.82	20.99	10.14	17.14	31.88	22.34	24.64	39.53	33.33	2.85	1.50	5.07	2.93	2.00
Fayetteville-Springdale-Rogers MSA	67	0.67	26.22	18.03	21.97	21.31	21.67	21.31	30.14	39.34	9.38	20.00	0.00	4.00	11.63
Jefferson City MSA	86	0.85	16.33	8.96	16.76	16.42	22.22	29.85	44.69	44.78	1.13	3.85	2.22	0.60	0.38
Joplin MSA	785	7.79	20.33	7.10	18.97	17.75	19.91	26.63	40.79	48.52	9.00	5.21	8.12	11.08	8.85
St. Joseph MSA	377	3.74	18.77	10.22	18.19	19.50	23.45	27.55	39.59	42.72	6.83	4.44	5.95	7.69	7.35
MO NonMSA Total 2012-2013	3,831	38.04	18.83	5.14	18.18	15.81	21.58	23.02	41.40	56.02	10.22	9.10	10.69	11.40	9.81
MO NonMSA Total 2014-2015	1,240	12.31	18.86	6.16	18.16	15.25	21.54	24.72	41.44	53.88	9.13	6.85	9.50	10.85	8.60

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF MISSOURI									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Springfield MSA	3,429	19.37	78.19	58.12	96.88	1.52	1.60	12.73	16.01
Limited Review:									
Cape Girardeau MSA	968	5.47	73.35	56.92	92.46	3.20	4.34	20.14	26.68
Columbia MSA 2012-2013	313	1.77	70.23	52.08	93.29	2.24	4.47	6.47	6.37
Columbia MSA 2014-2015	389	2.20	76.41	44.99	95.89	2.31	1.80	6.46	5.83
Fayetteville-Springdale-Rogers MSA	138	0.78	79.13	78.99	98.55	0.72	0.72	15.74	18.75
Jefferson City MSA	147	0.83	71.68	57.82	97.28	1.36	1.36	2.22	2.97
Joplin MSA	1,572	8.88	77.23	63.10	91.73	3.50	4.77	18.39	23.31
St. Joseph MSA	1,221	6.90	74.63	59.38	95.90	1.39	2.70	22.83	32.79
MO NonMSA Total 2012-2013	4,547	25.68	72.15	62.52	94.28	2.57	3.14	18.65	22.60
MO NonMSA Total 2014-2015	4,979	28.13	77.18	62.38	96.79	1.59	1.63	17.17	19.72

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF MISSOURI Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Springfield MSA	178	5.92	99.05	81.46	88.76	10.67	0.56	7.91	8.61
Limited Review:									
Cape Girardeau MSA	63	2.10	99.35	66.67	69.84	7.94	22.22	13.11	11.94
Columbia MSA 2012-2013	14	0.47	98.48	28.57	57.14	14.29	28.57	6.25	2.53
Columbia MSA 2014-2015	20	0.67	97.50	70.00	80.00	10.00	10.00	7.14	3.57
Fayetteville-Springdale-Rogers MSA	41	1.36	96.43	68.29	85.37	14.63	0.00	12.17	7.07
Jefferson City MSA	1	0.03	97.67	100.00	100.00	0.00	0.00	0.00	0.00
Joplin MSA	84	2.79	99.00	85.71	61.90	20.24	17.86	12.16	12.09
St. Joseph MSA	81	2.69	99.16	71.60	83.95	6.17	9.88	8.42	21.57
MO NonMSA Total 2012-2013	1,186	39.44	99.29	77.57	63.41	24.79	11.80	11.61	13.35
MO NonMSA Total 2014-2015	1,339	44.53	99.05	74.09	77.74	15.09	7.17	13.07	13.16

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF MISSOURI Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Springfield MSA	15	2,012	110	3,806	125	5,818	4.19	0	0
Limited Review:									
Cape Girardeau MSA	7	882	35	2,309	42	3,191	2.30	0	0
Columbia MSA 2012-2013	11	2,009	32	1,254	43	3,263	2.35	0	0
Columbia MSA 2014-2015	10	1,583	19	121	29	1,704	1.23	0	0
Fayetteville-Springdale-Rogers MSA	4	202	0	0	4	202	0.15	0	0
Jefferson City MSA	6	386	17	433	23	819	0.59	0	0
Joplin MSA	18	2,474	78	20,128	96	22,602	16.28	0	0
St. Joseph MSA	16	2,438	57	10,316	73	12,754	9.19	1	2,153
MO NonMSA Total 2012-2013	80	32,596	308	24,987	388	57,583	41.47	4	5,811
MO NonMSA Total 2014-2015	69	21,413	228	5,913	297	27,326	19.68	2	6
Statewide:									
Qualified Investments That Serve AAs	3	435	23	3,146	26	3,581	2.58	0	0
Qualified Investments Outside AAs	9	1,915	13	4,745	22	6,660	NA	1	17

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF MISSOURI																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Springfield MSA	11.18	13	12.38	0.00	38.46	46.15	15.38	0	0	0	0	0	0	2.31	18.23	59.65	19.82
Limited Review:																	
Cape Girardeau MSA	7.25	5	4.76	0.00	20.00	80.00	0.00	1	0	0	0	1	0	2.86	13.55	59.86	23.73
Columbia MSA 2012-2013	1.93	5	NA	60.00	20.00	0.00	20.00	0	0	0	0	0	0	8.72	18.13	44.47	28.69
Columbia MSA 2014-2015	1.93	5	4.76	60.00	20.00	0.00	20.00	0	0	0	0	0	0	9.78	19.24	42.29	28.69
Fayetteville-Springdale-Rogers MSA	0.99	1	0.95	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	19.79	80.21	0.00
Jefferson City MSA	0.78	1	0.95	100.00	0.00	0.00	0.00	0	0	0	0	0	0	2.95	11.26	53.30	32.50
Joplin MSA	11.11	10	9.52	0.00	20.00	80.00	0.00	0	0	0	0	0	0	0.00	12.99	80.87	6.14
St. Joseph MSA	7.88	6	5.71	0.00	16.67	66.67	16.67	0	0	0	0	0	0	0.00	12.90	68.17	18.93
MO NonMSA Total 2012-2013	28.26	63	NA	0.00	15.87	71.43	12.70	0	0	0	0	0	0	0.27	11.00	68.26	20.23
MO NonMSA Total 2014-2015	28.70	64	60.95	0.00	15.63	68.75	15.63	0	0	0	0	0	0	0.26	10.85	68.88	19.77

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF MISSOURI																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Springfield MSA	11.18	13	12.38	0.00	38.46	46.15	15.38	14	11.76	0.00	28.57	57.14	14.29	2.31	18.23	59.65	19.82
Limited Review:																	
Cape Girardeau MSA	7.25	5	4.76	0.00	20.00	80.00	0.00	7	5.88	0.00	14.29	85.71	0.00	2.86	13.55	59.86	23.73
Columbia MSA 2012-2013	1.93	5	NA	60.00	20.00	0.00	20.00	7	NA	57.14	14.29	0.00	28.57	8.72	18.13	44.47	28.69
Columbia MSA 2014-2015	1.93	5	4.76	60.00	20.00	0.00	20.00	7	5.88	42.86	14.29	14.29	28.57	9.78	19.24	42.29	28.69
Fayetteville-Springdale-Rogers MSA	0.99	1	0.95	0.00	0.00	100.00	0.00	1	0.84	0.00	0.00	100.00	0.00	0.00	19.79	80.21	0.00
Jefferson City MSA	0.78	1	0.95	100.00	0.00	0.00	0.00	1	0.84	100.00	0.00	0.00	0.00	2.95	11.26	53.30	32.50
Joplin MSA	11.11	10	9.52	0.00	20.00	80.00	0.00	12	10.08	0.00	16.67	75.00	8.33	0.00	12.99	80.87	6.14
St. Joseph MSA	7.88	6	5.71	0.00	16.67	66.67	16.67	6	5.04	0.00	16.67	66.67	16.67	0.00	12.90	68.17	18.93
MO NonMSA Total 2012-2013	28.26	63	NA	0.00	15.87	71.43	12.70	70	NA	0.00	14.29	68.57	17.14	0.27	11.00	68.26	20.23
MO NonMSA Total 2014-2015	28.70	64	60.95	0.00	15.63	68.75	15.63	71	59.66	1.41	15.49	61.97	21.13	0.26	10.85	68.88	19.77

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF MONTANA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Billings MSA	23.38	1,947	347,610	1,805	85,394	47	2,684	3	1,082	3,802	436,770	46.78
Limited Review:												
Great Falls MSA	16.42	1,201	165,524	1,352	32,843	112	9,707	5	7,933	2,670	216,007	14.35
Missoula MSA	12.74	763	139,767	1,289	32,857	13	233	6	1,725	2,071	174,582	10.09
MT NonMSA Total 2012-2013	27.41	2,270	419,009	2,064	53,902	120	13,176	2	8,632	4,456	494,719	14.39
MT NonMSA Total 2014-2015	20.03	1,006	196,330	2,009	49,801	240	12,768	1	500	3,256	259,399	14.39
Statewide:												
CD Loans With Potential Benefit to AAs	0.02	NA	NA	NA	NA	NA	NA	4	1,710	4	1,710	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	2	7,388	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Billings MSA	746	33.05	1.12	1.21	9.62	7.24	67.75	62.60	21.51	28.95	3.92	2.70	3.74	3.43	5.39
Limited Review:															
Great Falls MSA	200	8.86	0.00	0.00	12.48	14.00	62.32	52.50	25.20	33.50	1.41	0.00	0.99	1.35	1.66
Missoula MSA	235	10.41	0.00	0.00	11.95	13.19	57.03	53.19	31.02	33.62	1.30	0.00	1.04	0.81	2.58
MT NonMSA Total 2012-2013	592	26.23	0.01	0.17	9.24	5.57	62.62	59.46	28.13	34.80	4.43	25.00	4.33	3.60	6.27
MT NonMSA Total 2014-2015	484	21.44	0.01	0.00	9.24	4.75	62.09	63.02	28.65	32.23	3.31	0.00	1.74	3.23	3.83

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Billings MSA	95	21.40	1.12	0.00	9.62	3.16	67.75	56.84	21.51	40.00	6.10	0.00	0.00	4.79	12.50
Limited Review:															
Great Falls MSA	135	30.41	0.00	0.00	12.48	19.26	62.32	55.56	25.20	25.19	10.51	0.00	11.11	9.90	11.69
Missoula MSA	39	8.78	0.00	0.00	11.95	15.38	57.03	61.54	31.02	23.08	3.85	0.00	7.41	4.08	1.75
MT NonMSA Total 2012-2013	103	23.20	0.01	0.00	9.24	8.74	62.62	59.22	28.13	32.04	10.93	0.00	11.54	9.59	13.71
MT NonMSA Total 2014-2015	72	16.22	0.01	0.00	9.24	4.17	62.09	68.06	28.65	27.78	6.07	0.00	3.03	7.08	4.52

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Billings MSA	1,101	24.64	1.12	0.82	9.62	5.72	67.75	63.22	21.51	30.25	5.31	3.70	5.59	4.27	8.29
Limited Review:															
Great Falls MSA	859	19.22	0.00	0.00	12.48	11.87	62.32	56.11	25.20	32.01	8.40	0.00	15.45	6.59	9.49
Missoula MSA	485	10.85	0.00	0.00	11.95	11.55	57.03	52.58	31.02	35.88	2.22	0.00	2.20	2.28	2.14
MT NonMSA Total 2012-2013	1,575	35.24	0.01	0.13	9.24	7.05	62.62	58.29	28.13	34.54	7.68	20.00	6.56	7.13	9.08
MT NonMSA Total 2014-2015	449	10.05	0.01	0.00	9.24	8.69	62.09	56.57	28.65	34.74	4.90	0.00	6.14	4.36	5.75

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Billings MSA	5	29.41	8.47	0.00	16.72	40.00	58.44	60.00	16.37	0.00	2.38	0.00	0.00	3.70	0.00
Limited Review:															
Great Falls MSA	7	41.18	0.00	0.00	37.97	57.14	60.58	42.86	1.44	0.00	0.00	0.00	0.00	0.00	0.00
Missoula MSA	4	23.53	0.00	0.00	37.77	50.00	50.25	25.00	11.98	25.00	0.00	0.00	0.00	0.00	0.00
MT NonMSA Total 2012-2013	0	0.00	5.94	0.00	20.43	0.00	54.92	0.00	18.70	0.00	0.00	0.00	0.00	0.00	0.00
MT NonMSA Total 2014-2015	1	5.88	5.94	0.00	20.43	100.00	54.92	0.00	18.70	0.00	2.70	0.00	25.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF MONTANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Billings MSA	1,805	21.19	3.22	2.66	10.32	9.47	70.89	70.19	15.58	17.67	10.47	4.00	9.79	10.19	12.17
Limited Review:															
Great Falls MSA	1,352	15.87	0.00	0.00	21.28	24.85	62.17	59.02	16.55	16.12	17.96	0.00	20.19	17.37	17.10
Missoula MSA	1,289	15.13	0.00	0.00	25.53	24.44	51.73	51.67	22.73	23.89	10.00	0.00	9.14	10.06	9.58
MT NonMSA Total 2012-2013	2,064	24.23	0.35	0.00	12.69	15.36	60.50	50.05	26.45	34.59	11.15	0.00	13.37	9.27	12.66
MT NonMSA Total 2014-2015	2,009	23.58	0.39	0.15	13.05	17.47	59.09	50.32	27.46	32.06	8.71	7.69	11.44	7.64	8.33

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF MONTANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Billings MSA	47	8.83	1.27	0.00	6.68	4.26	72.66	89.36	19.40	6.38	4.52	0.00	25.00	4.80	1.85
Limited Review:															
Great Falls MSA	112	21.05	0.00	0.00	6.96	2.68	81.52	83.93	11.52	13.39	16.76	0.00	33.33	14.01	33.33
Missoula MSA	13	2.44	0.00	0.00	15.45	0.00	53.93	84.62	30.63	15.38	12.50	0.00	0.00	21.43	0.00
MT NonMSA Total 2012-2013	120	22.56	0.06	0.00	13.97	18.33	64.84	70.00	21.13	11.67	6.20	0.00	10.71	6.55	2.94
MT NonMSA Total 2014-2015	240	45.11	0.07	0.00	13.17	14.17	65.84	72.50	20.93	13.33	10.26	0.00	12.00	10.93	6.56

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Billings MSA	746	33.05	19.08	4.97	18.23	22.51	22.93	23.68	39.76	48.83	2.65	1.05	2.66	2.63	2.88
Limited Review:															
Great Falls MSA	200	8.86	20.00	4.90	18.52	19.58	21.71	30.77	39.77	44.76	1.40	2.34	0.84	1.78	1.26
Missoula MSA	235	10.41	20.33	3.20	17.67	17.60	21.20	32.80	40.80	46.40	1.01	0.00	0.51	1.00	1.43
MT NonMSA Total 2012-2013	592	26.23	17.65	3.40	16.69	18.49	21.40	25.66	44.26	52.45	2.15	1.53	2.19	2.18	2.16
MT NonMSA Total 2014-2015	484	21.44	17.60	2.20	16.66	13.92	21.37	26.37	44.36	57.51	2.22	1.64	1.67	2.26	2.42

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Billings MSA	95	21.40	19.08	4.94	18.23	22.22	22.93	22.22	39.76	50.62	5.43	0.00	1.89	7.25	7.09
Limited Review:															
Great Falls MSA	135	30.41	20.00	13.28	18.52	13.28	21.71	25.00	39.77	48.44	10.78	10.00	6.35	10.00	13.82
Missoula MSA	39	8.78	20.33	11.76	17.67	17.65	21.20	35.29	40.80	35.29	4.02	9.52	7.50	0.00	2.74
MT NonMSA Total 2012-2013	103	23.20	17.65	8.75	16.69	12.50	21.40	28.75	44.26	50.00	8.38	7.50	4.17	9.42	9.41
MT NonMSA Total 2014-2015	72	16.22	17.60	11.86	16.66	16.95	21.37	30.51	44.36	40.68	5.18	4.26	5.95	6.43	4.44

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF MONTANA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Billings MSA	1,101	24.64	19.08	7.32	18.23	16.81	22.93	22.63	39.76	53.24	4.12	5.69	4.63	3.21	4.20
Limited Review:															
Great Falls MSA	859	19.22	20.00	8.47	18.52	21.02	21.71	24.38	39.77	46.13	11.00	14.86	12.37	9.22	10.45
Missoula MSA	485	10.85	20.33	8.40	17.67	22.41	21.20	25.77	40.80	43.42	2.16	4.26	1.92	2.58	1.65
MT NonMSA Total 2012-2013	1,575	35.24	17.65	5.17	16.69	16.82	21.40	25.84	44.26	52.18	5.80	5.95	5.78	5.98	5.72
MT NonMSA Total 2014-2015	449	10.05	17.60	4.75	16.66	13.35	21.37	20.77	44.36	61.13	4.85	2.26	4.75	3.84	5.52

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF MONTANA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Billings MSA	1,805	21.19	78.73	47.48	89.97	4.65	5.37	10.47	9.82
Limited Review:									
Great Falls MSA	1,352	15.87	77.45	53.62	95.49	3.03	1.48	17.96	20.71
Missoula MSA	1,289	15.13	78.80	53.22	95.97	1.86	2.17	10.00	8.65
MT NonMSA Total 2012-2013	2,064	24.23	72.98	48.35	95.98	1.99	2.03	11.15	9.87
MT NonMSA Total 2014-2015	2,009	23.58	78.93	51.37	95.92	1.54	2.54	8.71	8.37

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF MONTANA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Billings MSA	47	8.83	97.14	63.83	82.98	6.38	10.64	4.52	4.31
Limited Review:									
Great Falls MSA	112	21.05	97.39	74.11	71.43	20.54	8.04	16.76	17.78
Missoula MSA	13	2.44	97.64	69.23	100.00	0.00	0.00	12.50	13.33
MT NonMSA Total 2012-2013	120	22.56	98.75	87.50	65.83	21.67	12.50	6.20	7.40
MT NonMSA Total 2014-2015	240	45.11	98.43	71.67	82.08	12.92	5.00	10.26	10.33

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF MONTANA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Billings MSA	35	7,391	49	13,651	84	21,042	19.80	0	0
Limited Review:									
Great Falls MSA	15	2,356	55	17,021	70	19,377	18.23	1	5
Missoula MSA	11	4,769	48	8,623	59	13,392	12.60	0	0
MT NonMSA Total 2012-2013	33	9,610	41	22,349	74	31,959	30.07	1	5
MT NonMSA Total 2014-2015	33	6,797	34	13,712	67	20,509	19.30	1	1
Statewide:									
Qualified Investments That Serve AAs	0	0	3	6	3	6	0.01	0	0
Qualified Investments Outside AAs	0	0	9	24,252	9	24,252	NA	1	1

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF MONTANA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Billings MSA	46.78	4	16.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.53	12.40	64.84	20.22
Limited Review:																	
Great Falls MSA	14.35	5	20.83	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	19.68	60.30	20.02
Missoula MSA	10.09	3	12.50	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	17.44	56.51	26.05
MT NonMSA Total 2012-2013	14.39	12	NA	0.00	25.00	66.67	8.33	0	0	0	0	0	0	1.22	11.37	62.22	25.01
MT NonMSA Total 2014-2015	14.39	12	50.00	0.00	25.00	66.67	8.33	0	0	0	0	0	0	1.22	11.37	61.69	25.55

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF MONTANA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Billings MSA	46.78	4	16.67	0.00	0.00	100.00	0.00	18	30.00	0.00	11.11	83.33	5.56	2.53	12.40	64.84	20.22
Limited Review:																	
Great Falls MSA	14.35	5	20.83	0.00	60.00	40.00	0.00	12	20.00	0.00	58.33	33.33	8.33	0.00	19.68	60.30	20.02
Missoula MSA	10.09	3	12.50	0.00	33.33	66.67	0.00	8	13.33	0.00	37.50	62.50	0.00	0.00	17.44	56.51	26.05
MT NonMSA Total 2012-2013	14.39	12	NA	0.00	25.00	66.67	8.33	23	NA	4.35	21.74	60.87	13.04	1.22	11.37	62.22	25.01
MT NonMSA Total 2014-2015	14.39	12	50.00	0.00	25.00	66.67	8.33	22	36.67	4.55	22.73	59.09	13.64	1.22	11.37	61.69	25.55

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF NEBRASKA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Lincoln MSA	50.73	4,625	574,462	3,248	89,051	37	463	10	63,591	7,920	727,567	66.22
Limited Review:												
Grand Island MSA 2014-2015	3.47	306	32,809	217	2,066	18	317	0	0	541	35,192	1.45
NE NonMSA Total 2012-2013	26.43	2,423	259,826	1,563	41,992	139	16,126	2	400	4,127	318,344	16.89
NE NonMSA Total 2014-2015	19.37	1,436	151,547	1,398	32,249	190	15,064	1	200	3,025	199,060	15.44
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Lincoln MSA	2,562	51.81	4.96	5.85	14.03	19.01	40.58	49.57	40.43	25.57	10.51	18.35	18.71	12.22	5.84
Limited Review:															
Grand Island MSA 2014-2015	245	4.95	0.00	0.00	5.17	10.20	70.79	67.76	24.04	22.04	12.81	0.00	17.95	13.51	9.97
NE NonMSA Total 2012-2013	1,157	23.40	0.00	0.00	6.07	8.04	70.62	72.86	23.31	19.10	16.93	0.00	21.15	18.19	12.54
NE NonMSA Total 2014-2015	981	19.84	0.00	0.00	6.24	5.71	71.45	77.17	22.31	17.13	13.20	0.00	12.61	14.02	10.63

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Lincoln MSA	145	38.26	4.96	1.38	14.03	13.79	40.58	44.83	40.43	40.00	4.71	0.00	2.35	5.45	5.03
Limited Review:															
Grand Island MSA 2014-2015	21	5.54	0.00	0.00	5.17	0.00	70.79	76.19	24.04	23.81	6.18	0.00	0.00	5.98	7.69
NE NonMSA Total 2012-2013	120	31.66	0.00	0.00	6.07	6.67	70.62	69.17	23.31	24.17	12.59	0.00	17.86	12.24	12.59
NE NonMSA Total 2014-2015	93	24.54	0.00	0.00	6.24	5.38	71.45	76.34	22.31	18.28	9.52	0.00	7.14	10.12	8.28

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF NEBRASKA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Lincoln MSA	1,910	55.36	4.96	3.61	14.03	13.19	40.58	45.24	40.43	37.96	4.67	10.32	6.30	5.79	3.06
Limited Review:															
Grand Island MSA 2014-2015	39	1.13	0.00	0.00	5.17	5.13	70.79	71.79	24.04	23.08	4.25	0.00	0.00	5.39	2.53
NE NonMSA Total 2012-2013	1141	33.07	0.00	0.00	6.07	5.61	70.62	70.73	23.31	23.66	10.32	0.00	13.77	11.23	7.56
NE NonMSA Total 2014-2015	360	10.43	0.00	0.00	6.24	5.83	71.45	79.17	22.31	15.00	8.47	0.00	10.83	9.66	4.93

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Lincoln MSA	8	50.00	24.90	75.00	28.17	12.50	31.76	12.50	15.17	0.00	4.95	7.14	5.56	0.00	0.00
Limited Review:															
Grand Island MSA 2014-2015	1	6.25	0.00	0.00	14.04	100.00	59.05	0.00	26.91	0.00	6.67	0.00	50.00	0.00	0.00
NE NonMSA Total 2012-2013	5	31.25	0.00	0.00	18.73	40.00	58.79	20.00	22.48	40.00	6.25	0.00	0.00	5.88	12.50
NE NonMSA Total 2014-2015	2	12.50	0.00	0.00	19.78	0.00	58.77	50.00	21.45	50.00	6.67	0.00	0.00	4.00	33.33

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF NEBRASKA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Lincoln MSA	3,243	50.51	7.67	8.11	22.77	20.41	32.27	34.84	36.82	36.63	16.60	23.29	15.31	19.32	14.39
Limited Review:															
Grand Island MSA 2014-2015	217	3.38	0.00	0.00	7.66	7.37	66.32	63.59	26.02	29.03	13.35	0.00	16.44	13.11	11.97
NE NonMSA Total 2012-2013	1,563	24.34	0.00	0.00	9.88	9.92	67.02	68.71	23.10	21.37	16.41	0.00	15.82	16.47	15.55
NE NonMSA Total 2014-2015	1,398	21.77	0.00	0.00	10.45	9.87	67.19	69.31	22.36	20.82	14.86	0.00	13.83	14.80	15.27

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF NEBRASKA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Lincoln MSA	37	9.64	1.67	0.00	7.98	2.70	20.22	24.32	70.13	72.97	5.77	50.00	0.00	9.68	5.00
Limited Review:															
Grand Island MSA 2014-2015	18	4.69	0.00	0.00	3.14	0.00	78.70	94.44	18.16	5.56	3.23	0.00	0.00	2.27	4.55
NE NonMSA Total 2012-2013	139	36.20	0.00	0.00	3.43	2.16	66.14	72.66	30.43	25.18	2.51	0.00	7.14	2.84	1.54
NE NonMSA Total 2014-2015	190	49.48	0.00	0.00	3.20	2.63	66.79	76.32	30.01	21.05	3.69	0.00	8.33	4.03	2.28

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Lincoln MSA	2,562	51.81	19.40	26.24	18.18	37.13	23.30	17.82	39.12	18.81	3.81	9.80	6.46	1.90	1.60
Limited Review:															
Grand Island MSA 2014-2015	245	4.95	17.96	7.14	18.60	19.05	24.68	33.33	38.76	40.48	2.17	0.00	2.09	3.19	2.17
NE NonMSA Total 2012-2013	1,157	23.40	17.81	8.12	17.74	24.06	23.15	27.83	41.29	40.00	6.67	6.70	7.71	5.68	6.68
NE NonMSA Total 2014-2015	981	19.84	17.69	10.20	17.49	26.67	22.79	27.45	42.03	35.69	4.36	6.80	5.46	3.89	3.54

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Lincoln MSA	145	38.26	19.40	10.71	18.18	22.86	23.30	29.29	39.12	37.14	4.68	1.59	5.59	3.85	5.33
Limited Review:															
Grand Island MSA 2014-2015	21	5.54	17.96	23.81	18.60	28.57	24.68	14.29	38.76	33.33	6.36	12.50	9.52	2.44	5.41
NE NonMSA Total 2012-2013	120	31.66	17.81	7.02	17.74	14.04	23.15	33.33	41.29	45.61	12.43	9.80	7.84	14.57	13.51
NE NonMSA Total 2014-2015	93	24.54	17.69	7.78	17.49	22.22	22.79	27.78	42.03	42.22	9.78	6.98	10.38	11.72	8.91

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Lincoln MSA	1,910	55.36	19.40	11.55	18.18	27.43	23.30	30.58	39.12	30.44	5.00	8.21	7.26	6.15	2.92
Limited Review:															
Grand Island MSA 2014-2015	39	1.13	17.96	8.57	18.60	34.29	24.68	31.43	38.76	25.71	4.41	2.33	10.00	4.55	2.51
NE NonMSA Total 2012-2013	1141	33.07	17.81	8.70	17.74	20.50	23.15	29.50	41.29	41.30	10.65	13.13	13.66	12.98	8.14
NE NonMSA Total 2014-2015	360	10.43	17.69	8.44	17.49	23.44	22.79	28.44	42.03	39.69	8.91	11.67	11.32	9.34	7.36

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF NEBRASKA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Lincoln MSA	3,248	50.54	77.36	63.21	96.00	1.88	2.12	16.60	20.57
Limited Review:									
Grand Island MSA 2014-2015	217	3.38	74.50	63.59	99.54	0.46	0.00	13.35	17.40
NE NonMSA Total 2012-2013	1,563	24.32	72.33	59.56	95.20	3.13	1.66	16.41	19.34
NE NonMSA Total 2014-2015	1,398	21.76	75.42	62.45	95.85	2.22	1.93	14.86	18.17

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF NEBRASKA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Lincoln MSA	37	9.64	98.79	70.27	100.00	0.00	0.00	5.77	5.15
Limited Review:									
Grand Island MSA 2014-2015	18	4.69	97.76	66.67	94.44	5.56	0.00	3.23	5.00
NE NonMSA Total 2012-2013	139	36.20	98.52	72.66	66.19	15.83	17.99	2.51	3.31
NE NonMSA Total 2014-2015	190	49.48	98.27	66.84	78.95	9.47	11.58	3.69	3.46

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF NEBRASKA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Lincoln MSA	44	6,173	91	40,393	135	46,566	60.72	0	0
Limited Review:									
Grand Island MSA 2014-2015	5	102	14	289	19	391	0.51	0	0
NE NonMSA Total 2012-2013	87	16,664	71	4,425	158	21,089	27.50	1	1,420
NE NonMSA Total 2014-2015	32	3,978	35	3,902	67	7,880	10.27	0	0
Statewide:									
Qualified Investments That Serve AAs	3	600	18	168	21	768	1.00	0	0
Qualified Investments Outside AAs	7	35	85	9,010	92	9,045	NA	2	50

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF NEBRASKA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Lincoln MSA	66.22	13	46.43	0.00	23.08	53.85	23.08	1	0	0	0	0	1	11.91	18.93	36.83	31.79
Limited Review:																	
Grand Island MSA 2014-2015	1.45	2	7.14	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	8.60	69.43	21.96
NE NonMSA Total 2012-2013	16.89	15	NA	0.00	20.00	66.67	13.33	0	0	0	0	0	0	0.00	9.19	69.35	21.46
NE NonMSA Total 2014-2015	15.44	13	46.43	0.00	15.38	69.23	15.38	0	0	0	0	0	0	0.00	9.32	70.08	20.61

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF NEBRASKA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Lincoln MSA	66.22	13	46.43	0.00	23.08	53.85	23.08	15	45.45	0.00	20.00	53.33	20.00	11.91	18.93	36.83	31.79
Limited Review:																	
Grand Island MSA 2014-2015	1.45	2	7.14	0.00	50.00	50.00	0.00	2	6.06	0.00	50.00	50.00	0.00	0.00	8.60	69.43	21.96
NE NonMSA Total 2012-2013	16.89	15	NA	0.00	20.00	66.67	13.33	18	NA	0.00	16.67	66.67	16.67	0.00	9.19	69.35	21.46
NE NonMSA Total 2014-2015	15.44	13	46.43	0.00	15.38	69.23	15.38	16	48.48	0.00	12.50	68.75	18.75	0.00	9.32	70.08	20.61

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF NEVADA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Las Vegas-Henderson-Paradise MSA	63.62	11,749	2,299,863	11,811	275,561	50	712	12	150,586	23,622	2,726,722	67.67
Limited Review:												
Carson City MSA	3.24	527	77,434	675	13,246	1	5	0	0	1,203	90,685	4.25
Reno MSA	21.90	4,155	867,910	3,950	98,602	15	121	10	17,107	8,130	983,740	19.42
NV NonMSA Total	11.24	2,193	405,388	1,917	33,341	65	941	0	0	4,175	439,670	8.66
Statewide:												
CD Loans That Serve Bank AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside Bank AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF NEVADA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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-Henderson-Paradise MSA	6,670	60.85	1.74	0.70	15.53	8.05	45.66	46.93	37.07	44.32	7.70	6.90	8.44	8.41	6.81
Limited Review:															
Carson City MSA	284	2.59	0.00	0.00	16.96	21.13	71.80	76.06	11.25	2.82	11.21	0.00	17.29	10.30	5.77
Reno MSA	2,626	23.96	3.53	2.48	15.70	15.54	36.70	47.87	44.07	34.12	11.92	15.24	17.08	15.77	7.45
NV NonMSA Total	1,381	12.60	0.83	0.07	21.71	11.44	55.90	62.27	21.56	26.21	9.76	0.00	9.22	10.35	8.68

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: STATE OF NEVADA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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-Henderson-Paradise MSA	364	58.90	1.74	0.55	15.53	8.52	45.66	46.15	37.07	44.78	5.89	4.17	5.39	6.33	5.65
Limited Review:															
Carson City MSA	26	4.21	0.00	0.00	16.96	11.54	71.80	73.08	11.25	15.38	8.70	0.00	11.76	8.82	0.00
Reno MSA	132	21.36	3.53	3.79	15.70	13.64	36.70	32.58	44.07	50.00	6.48	14.29	3.57	7.82	5.92
NV NonMSA Total	96	15.53	0.83	1.04	21.71	18.75	55.90	52.08	21.56	28.13	8.81	50.00	11.43	10.10	4.26

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF NEVADA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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-Henderson-Paradise MSA	4,709	67.01	1.74	0.53	15.53	7.50	45.66	43.60	37.07	48.38	3.02	3.90	3.84	3.08	2.82
Limited Review:															
Carson City MSA	215	3.06	0.00	0.00	16.96	13.02	71.80	76.28	11.25	10.70	9.23	0.00	8.82	9.64	6.67
Reno MSA	1,390	19.78	3.53	1.87	15.70	9.06	36.70	31.58	44.07	57.48	3.77	6.29	4.55	3.52	3.70
NV NonMSA Total	713	10.15	0.83	0.00	21.71	14.03	55.90	47.27	21.56	38.71	4.52	0.00	3.89	4.04	5.81

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF NEVADA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Las Vegas-Henderson-Paradise MSA	6	33.33	13.16	33.33	41.60	0.00	34.88	50.00	10.35	16.67	3.70	7.69	0.00	7.69	0.00
Limited Review:															
Carson City MSA	2	11.11	0.00	0.00	24.15	0.00	71.13	100.00	4.72	0.00	0.00	0.00	0.00	0.00	0.00
Reno MSA	7	38.89	23.38	14.29	42.85	71.43	22.09	0.00	11.69	14.29	5.26	0.00	10.00	0.00	0.00
NV NonMSA Total	3	16.67	1.36	0.00	17.26	33.33	67.60	66.67	13.79	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF NEVADA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas-Henderson-Paradise MSA	11,811	64.76	4.92	3.23	21.14	16.08	42.34	43.18	31.59	37.52	9.66	10.48	9.02	9.73	9.85
Limited Review:															
Carson City MSA	675	3.70	0.00	0.00	12.04	12.89	80.73	77.48	7.23	9.63	13.72	0.00	14.13	13.55	14.29
Reno MSA	3,836	21.03	10.84	8.34	29.04	23.80	21.12	25.55	34.02	42.31	10.10	10.40	8.71	11.55	10.51
NV NonMSA Total	1,917	10.51	0.59	0.21	16.08	12.31	62.84	64.21	20.39	23.27	12.05	7.69	12.57	12.76	10.96

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF NEVADA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Las Vegas-Henderson-Paradise MSA	50	38.17	2.33	0.00	18.27	14.00	43.86	50.00	35.54	36.00	30.19	0.00	100.00	41.67	21.62
Limited Review:															
Carson City MSA	1	0.76	0.00	0.00	12.35	0.00	83.95	100.00	3.70	0.00	75.00	0.00	100.00	66.67	0.00
Reno MSA	15	11.45	7.09	0.00	19.82	26.67	30.91	33.33	40.55	40.00	12.50	0.00	16.67	12.50	15.00
NV NonMSA Total	65	49.62	1.82	0.00	12.97	10.77	66.28	80.00	18.81	9.23	11.63	0.00	15.38	12.30	12.50

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF NEVADA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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-Henderson-Paradise MSA	6,670	60.85	20.10	6.98	18.02	14.60	22.00	20.28	39.88	58.14	0.91	0.49	0.56	0.84	1.16
Limited Review:															
Carson City MSA	284	2.59	22.27	9.38	17.26	37.50	19.79	25.00	40.68	28.13	1.13	0.00	3.66	0.00	0.47
Reno MSA	2,626	23.96	20.97	5.61	17.79	14.88	20.40	18.29	40.84	61.22	1.50	1.12	1.64	1.28	1.60
NV NonMSA Total	1,381	12.60	20.25	5.22	17.78	19.68	23.17	22.09	38.80	53.01	1.65	1.10	1.01	1.06	2.39

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF NEVADA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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-Henderson-Paradise MSA	364	58.90	20.10	6.25	18.02	23.51	22.00	26.19	39.88	44.05	6.01	3.47	7.24	6.70	5.63
Limited Review:															
Carson City MSA	26	4.21	22.27	9.09	17.26	36.36	19.79	13.64	40.68	40.91	7.87	0.00	23.53	2.78	6.06
Reno MSA	132	21.36	20.97	10.69	17.79	25.95	20.40	14.50	40.84	48.85	6.85	13.16	7.69	5.06	6.73
NV NonMSA Total	96	15.53	20.25	9.57	17.78	23.40	23.17	25.53	38.80	41.49	9.30	10.00	16.33	9.52	6.52

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF NEVADA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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-Henderson-Paradise MSA	4,709	67.01	20.10	9.35	18.02	19.66	22.00	25.00	39.88	45.99	3.73	3.58	4.48	3.97	3.36
Limited Review:															
Carson City MSA	215	3.06	22.27	15.08	17.26	24.12	19.79	26.13	40.68	34.67	11.06	16.67	12.50	12.90	7.66
Reno MSA	1,390	19.78	20.97	8.47	17.79	18.31	20.40	22.16	40.84	51.07	3.94	5.88	3.79	3.29	4.10
NV NonMSA Total	713	10.15	20.25	7.60	17.78	16.89	23.17	23.82	38.80	51.69	5.21	5.48	5.24	4.52	5.53

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF NEVADA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Las Vegas-Henderson-Paradise MSA	11,811	64.35	75.35	57.79	96.54	1.56	1.91	9.66	10.72
Limited Review:									
Carson City MSA	675	3.68	72.32	60.15	97.78	0.74	1.48	13.72	14.51
Reno MSA	3,950	21.52	75.52	61.34	96.41	1.14	2.46	10.10	11.16
NV NonMSA Total	1,917	10.45	77.67	60.46	97.91	1.10	0.99	12.05	12.28

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF NEVADA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Las Vegas-Henderson-Paradise MSA	50	38.17	91.87	60.00	96.00	2.00	2.00	30.19	40.00
Limited Review:									
Carson City MSA	1	0.76	98.77	0.00	100.00	0.00	0.00	75.00	0.00
Reno MSA	15	11.45	94.18	73.33	100.00	0.00	0.00	12.50	20.69
NV NonMSA Total	65	49.62	93.64	64.62	100.00	0.00	0.00	11.63	13.46

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF NEVADA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Las Vegas-Henderson-Paradise MSA	64	24,336	150	51,623	214	75,959	63.36	3	108
Limited Review:									
Carson City MSA	9	1,614	19	9,332	28	10,946	9.13	0	0
Reno MSA	14	2,791	83	19,230	97	22,021	18.37	1	10
NV NonMSA Total	21	3,491	24	7,426	45	10,917	9.11	1	7
Statewide:									
Qualified Investments That Serve AAs	0	0	10	51	10	51	0.04	0	0
Qualified Investments Outside AAs	0	0	0	0	0	0	NA	0	0

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF NEVADA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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-Henderson-Paradise MSA	67.67	68	68.69	5.88	19.12	50.00	25.00	1	6	-1	0	-4	0	5.29	22.78	42.19	29.74
Limited Review:																	
Carson City MSA	4.25	4	4.04	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	19.89	73.22	6.89
Reno MSA	19.42	19	19.19	21.05	15.79	36.84	26.32	0	1	-1	0	0	0	10.21	22.54	34.23	32.97
NV NonMSA Total	8.66	8	8.08	0.00	0.00	87.50	12.50	0	0	0	0	0	0	1.14	20.04	60.05	18.76

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF NEVADA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Las Vegas-Henderson-Paradise MSA	67.67	68	68.69	5.88	19.12	50.00	25.00	73	64.04	6.85	17.81	50.68	24.66	5.29	22.78	42.19	29.74
Limited Review:																	
Carson City MSA	4.25	4	4.04	0.00	0.00	75.00	25.00	7	6.14	0.00	14.29	57.14	28.57	0.00	19.89	73.22	6.89
Reno MSA	19.42	19	19.19	21.05	15.79	36.84	26.32	24	21.05	25.00	20.83	29.17	25.00	10.21	22.54	34.23	32.97
NV NonMSA Total	8.66	8	8.08	0.00	0.00	87.50	12.50	10	8.77	0.00	10.00	80.00	10.00	1.14	20.04	60.05	18.76

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF NEW MEXICO												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Albuquerque MSA	70.29	3,838	648,987	4,382	188,733	63	4,731	10	41,065	8,293	883,516	67.62
Limited Review:												
Las Cruces MSA	9.86	879	137,530	279	12,448	4	103	1	41	1,163	150,122	3.78
Santa Fe MSA	10.42	570	153,959	644	24,250	13	860	2	11,250	1,229	190,319	8.31
NM NonMSA Total	9.42	476	64,814	592	20,614	41	4,686	2	7,588	1,111	97,702	20.29
Statewide:												
CD Loans That Serve AAs	0.02	NA	NA	NA	NA	NA	NA	2	950	2	950	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	2	14,600	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF NEW MEXICO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Albuquerque MSA	1,960	68.60	2.24	2.04	27.69	25.77	35.35	38.93	34.73	33.27	1.81	2.39	1.38	2.01	1.81
Limited Review:															
Las Cruces MSA	540	18.90	4.58	2.59	31.65	12.22	18.07	21.11	45.70	64.07	2.75	1.59	2.41	3.01	2.77
Santa Fe MSA	200	7.00	3.42	0.50	20.89	11.00	34.30	29.00	41.40	59.50	2.41	0.00	1.52	3.02	2.35
NM NonMSA Total	157	5.50	1.74	0.00	30.05	16.56	50.33	51.59	17.87	31.85	1.41	0.00	0.54	1.28	1.88

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF NEW MEXICO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Albuquerque MSA	125	50.00	2.24	1.60	27.69	24.80	35.35	35.20	34.73	38.40	2.47	5.00	3.86	2.12	1.95
Limited Review:															
Las Cruces MSA	28	11.20	4.58	0.00	31.65	14.29	18.07	10.71	45.70	75.00	3.25	0.00	3.23	0.00	4.37
Santa Fe MSA	30	12.00	3.42	6.67	20.89	6.67	34.30	43.33	41.40	43.33	4.97	0.00	0.00	7.58	4.40
NM NonMSA Total	67	26.80	1.74	0.00	30.05	19.40	50.33	55.22	17.87	25.37	11.76	0.00	9.09	10.13	20.00

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF NEW MEXICO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Albuquerque MSA	1,746	65.91	2.24	1.20	27.69	16.49	35.35	31.96	34.73	50.34	1.89	1.94	1.75	1.79	2.04
Limited Review:															
Las Cruces MSA	311	11.74	4.58	0.96	31.65	14.47	18.07	13.83	45.70	70.74	2.52	1.67	2.51	2.36	2.61
Santa Fe MSA	340	12.84	3.42	0.88	20.89	7.94	34.30	27.35	41.40	63.82	2.21	0.00	0.85	1.63	3.08
NM NonMSA Total	252	9.51	1.74	1.19	30.05	13.89	50.33	42.06	17.87	42.86	3.77	9.09	5.56	3.56	3.22

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF NEW MEXICO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Albuquerque MSA	7	100.00	13.31	28.57	33.96	42.86	34.30	28.57	18.43	0.00	1.69	0.00	5.26	0.00	0.00
Limited Review:															
Las Cruces MSA	0	0.00	24.48	0.00	18.86	0.00	6.88	0.00	49.79	0.00	0.00	0.00	0.00	0.00	0.00
Santa Fe MSA	0	0.00	17.98	0.00	23.68	0.00	48.09	0.00	10.25	0.00	0.00	0.00	0.00	0.00	0.00
NM NonMSA Total	0	0.00	2.01	0.00	27.25	0.00	39.68	0.00	31.06	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF NEW MEXICO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albuquerque MSA	4,382	74.31	6.06	6.53	26.47	28.09	34.34	32.41	33.14	32.98	9.42	10.65	10.38	9.66	8.08
Limited Review:															
Las Cruces MSA	279	4.73	8.88	6.45	26.68	23.66	18.07	18.64	46.37	51.25	4.43	5.26	2.94	4.32	4.77
Santa Fe MSA	644	10.92	9.26	11.34	10.99	9.32	41.80	47.36	37.88	31.99	6.04	4.98	4.12	7.18	5.60
NM NonMSA Total	592	10.04	2.39	2.36	28.47	23.48	48.84	52.03	20.30	22.13	8.78	13.79	7.84	10.64	7.29

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF NEW MEXICO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albuquerque MSA	63	52.07	3.43	1.59	25.77	55.56	36.95	28.57	33.85	14.29	20.83	100.00	18.92	22.58	33.33
Limited Review:															
Las Cruces MSA	4	3.31	4.00	0.00	43.53	0.00	13.18	50.00	39.29	50.00	3.28	0.00	0.00	16.67	0.00
Santa Fe MSA	13	10.74	4.66	0.00	12.33	0.00	35.07	15.38	47.95	84.62	35.71	0.00	0.00	40.00	37.50
NM NonMSA Total	41	33.88	0.00	0.00	8.18	7.32	60.97	65.85	30.86	26.83	7.87	0.00	0.00	7.69	11.11

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF NEW MEXICO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Albuquerque MSA	1,960	68.60	22.17	6.86	17.86	18.29	19.18	22.00	40.80	52.86	0.58	0.38	0.47	0.78	0.55
Limited Review:															
Las Cruces MSA	540	18.90	25.10	2.30	16.55	14.94	16.27	19.54	42.09	63.22	0.71	0.00	1.47	0.53	0.67
Santa Fe MSA	200	7.00	23.60	5.15	16.10	15.46	18.88	14.43	41.42	64.95	1.69	2.82	0.86	0.85	2.13
NM NonMSA Total	157	5.50	25.15	5.80	18.01	18.84	20.07	28.99	36.77	46.38	0.91	0.00	1.43	1.00	0.79

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF NEW MEXICO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Albuquerque MSA	125	50.00	22.17	12.62	17.86	24.27	19.18	22.33	40.80	40.78	2.43	6.93	2.29	1.85	1.98
Limited Review:															
Las Cruces MSA	28	11.20	25.10	6.25	16.55	12.50	16.27	18.75	42.09	62.50	2.87	3.85	4.17	2.17	2.73
Santa Fe MSA	30	12.00	23.60	7.69	16.10	11.54	18.88	23.08	41.42	57.69	4.57	0.00	5.56	2.17	5.88
NM NonMSA Total	67	26.80	25.15	4.76	18.01	17.46	20.07	25.40	36.77	52.38	10.96	5.00	12.50	6.45	14.08

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF NEW MEXICO															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Albuquerque MSA	1,746	65.91	22.17	8.36	17.86	13.38	19.18	20.51	40.80	57.75	1.57	1.78	1.44	1.60	1.57
Limited Review:															
Las Cruces MSA	311	11.74	25.10	3.37	16.55	6.74	16.27	16.85	42.09	73.03	1.05	0.00	0.00	1.75	1.05
Santa Fe MSA	340	12.84	23.60	4.52	16.10	10.97	18.88	17.42	41.42	67.10	1.86	2.11	1.53	1.39	2.07
NM NonMSA Total	252	9.51	25.15	5.59	18.01	8.38	20.07	21.79	36.77	64.25	4.73	2.63	7.04	4.11	4.75

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF NEW MEXICO									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Albuquerque MSA	4,382	74.31	78.83	59.45	91.67	3.83	4.50	9.42	10.41
Limited Review:									
Las Cruces MSA	279	4.73	76.14	62.01	92.11	3.23	4.66	4.43	5.22
Santa Fe MSA	644	10.92	80.06	62.58	93.32	3.57	3.11	6.04	7.10
NM NonMSA Total	592	10.04	72.35	59.29	94.26	2.53	3.21	8.78	10.88

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF NEW MEXICO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Albuquerque MSA	63	52.07	96.17	65.08	79.37	12.70	7.94	20.83	19.67
Limited Review:									
Las Cruces MSA	4	3.31	90.82	50.00	100.00	0.00	0.00	3.28	3.13
Santa Fe MSA	13	10.74	98.08	61.54	69.23	30.77	0.00	35.71	42.86
NM NonMSA Total	41	33.88	93.68	68.29	60.98	34.15	4.88	7.87	14.55

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF NEW MEXICO Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Albuquerque MSA	3	1,404	273	48,333	276	49,737	52.08	1	211
Limited Review:									
Las Cruces MSA	0	0	24	1,109	24	1,109	1.16	0	0
Santa Fe MSA	1	860	50	13,201	51	14,061	14.72	0	0
NM NonMSA Total	2	2,441	76	26,487	78	28,928	30.29	0	0
Statewide:									
Qualified Investments That Serve AAs	1	1,200	26	465	27	1,665	1.74	0	0
Qualified Investments Outside AAs	1	493	20	9,726	21	10,219	NA	0	0

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF NEW MEXICO																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Albuquerque MSA	67.62	19	57.58	0.00	42.11	31.58	26.32	1	0	0	0	1	0	4.46	31.72	33.64	30.17
Limited Review:																	
Las Cruces MSA	3.78	3	9.09	33.33	33.33	0.00	33.33	1	0	0	0	0	1	9.56	34.48	18.17	37.79
Santa Fe MSA	8.31	4	12.12	25.00	0.00	75.00	0.00	0	0	0	0	0	0	5.94	23.86	35.11	34.44
NM NonMSA Total	20.29	7	21.21	0.00	28.57	57.14	14.29	0	0	0	0	0	0	2.64	36.79	46.92	13.66

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF NEW MEXICO																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Albuquerque MSA	67.62	19	57.58	0.00	42.11	31.58	26.32	25	56.82	12.00	36.00	28.00	24.00	4.46	31.72	33.64	30.17
Limited Review:																	
Las Cruces MSA	3.78	3	9.09	33.33	33.33	0.00	33.33	5	11.36	40.00	20.00	0.00	40.00	9.56	34.48	18.17	37.79
Santa Fe MSA	8.31	4	12.12	25.00	0.00	75.00	0.00	4	9.09	50.00	0.00	50.00	0.00	5.94	23.86	35.11	34.44
NM NonMSA Total	20.29	7	21.21	0.00	28.57	57.14	14.29	10	22.73	10.00	30.00	50.00	10.00	2.64	36.79	46.92	13.66

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF NORTH DAKOTA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Bismarck MSA	37.54	1,079	178,397	2,553	59,858	81	3,236	5	6,089	3,718	247,580	51.18
Limited Review:												
ND NonMSA Total	62.46	2,385	440,386	3,511	53,759	289	7,487	2	2,160	6,187	503,792	48.82
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Bismarck MSA	377	23.67	4.58	1.06	7.50	3.71	68.54	69.76	19.39	25.46	3.72	2.38	4.24	3.68	3.77
Limited Review:															
ND NonMSA Total	1,216	76.33	0.00	0.00	4.27	5.76	84.39	81.83	11.33	12.42	9.15	0.00	12.93	9.07	8.29

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Bismarck MSA	88	30.24	4.58	0.00	7.50	4.55	68.54	67.05	19.39	28.41	3.77	0.00	0.00	2.57	8.00
Limited Review:															
ND NonMSA Total	203	69.76	0.00	0.00	4.27	6.40	84.39	80.30	11.33	13.30	10.44	0.00	14.81	10.74	5.77

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Bismarck MSA	608	38.92	4.58	0.82	7.50	4.44	68.54	66.61	19.39	28.13	4.52	11.11	5.50	4.74	3.62
Limited Review:															
ND NonMSA Total	954	61.08	0.00	0.00	4.27	3.35	84.39	86.37	11.33	10.27	8.52	0.00	6.60	8.87	6.13

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Bismarck MSA	6	33.33	0.79	0.00	4.35	16.67	79.72	50.00	15.14	33.33	6.98	0.00	0.00	5.71	20.00
Limited Review:															
ND NonMSA Total	12	66.67	0.00	0.00	9.79	8.33	81.05	91.67	9.15	0.00	2.38	0.00	0.00	2.63	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF NORTH DAKOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bismarck MSA	2,553	42.10	5.58	9.52	6.81	5.44	71.03	65.18	16.58	19.86	30.53	27.03	29.69	29.96	31.60
Limited Review:															
ND NonMSA Total	3,511	57.90	0.00	0.00	5.69	5.72	84.31	84.73	10.00	9.54	20.75	0.00	20.61	19.69	19.76

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF NORTH DAKOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Bismarck MSA	81	21.89	1.56	0.00	14.54	8.64	69.71	76.54	14.18	14.81	16.94	0.00	17.65	16.67	17.65
Limited Review:															
ND NonMSA Total	289	78.11	0.00	0.00	0.55	1.38	92.08	94.81	7.38	3.81	4.52	0.00	28.57	4.01	4.43

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Bismarck MSA	377	23.67	18.06	10.71	18.51	25.00	23.25	31.79	40.19	32.50	3.30	3.87	2.98	3.72	3.06
Limited Review:															
ND NonMSA Total	1,216	76.33	16.97	3.85	17.68	22.60	23.42	32.21	41.92	41.35	2.56	2.20	3.30	2.44	2.37

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Fami- lies***	% BANK Loans****	% Fami- lies***	% BANK Loans****	% Fami- lies***	% BANK Loans****	% Fami- lies***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bismarck MSA	88	30.24	18.06	10.13	18.51	18.99	23.25	24.05	40.19	46.84	3.45	3.70	1.72	6.59	2.49
Limited Review:															
ND NonMSA Total	203	69.76	16.97	7.41	17.68	15.43	23.42	29.63	41.92	47.53	9.19	8.70	13.56	9.09	8.27

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Bismarck MSA	608	38.92	18.06	8.55	18.51	22.61	23.25	30.35	40.19	38.49	3.22	4.39	3.17	2.67	3.45
Limited Review:															
ND NonMSA Total	954	61.08	16.97	6.12	17.68	15.21	23.42	24.83	41.92	53.85	4.92	6.25	3.72	4.58	5.27

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF NORTH DAKOTA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Bismarck MSA	2,553	42.10	76.91	46.22	97.02	1.25	1.72	30.53	35.58
Limited Review:									
ND NonMSA Total	3,511	57.90	75.76	47.96	98.35	0.74	0.91	20.75	20.12

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF NORTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Bismarck MSA	81	21.89	98.68	72.84	88.89	11.11	0.00	16.94	24.56
Limited Review:									
ND NonMSA Total	289	78.11	98.57	44.64	93.43	3.46	3.11	4.52	4.32

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF NORTH DAKOTA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Bismarck MSA	21	2,566	69	8,372	90	10,938	19.21	0	0
Limited Review:									
ND NonMSA Total	37	4,555	202	41,017	239	45,572	80.03	0	0
Statewide:									
Qualified Investments That Serve AAs	2	370	5	62	7	432	0.76	0	0
Qualified Investments Outside AAs	0	0	2	300	2	300	NA	0	0

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF NORTH DAKOTA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Bismarck MSA	51.18	4	26.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.60	7.95	69.18	19.27
Limited Review:																	
ND NonMSA Total	48.82	11	73.33	0.00	9.09	90.91	0.00	0	0	0	0	0	0	0.00	5.14	84.10	10.77

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF NORTH DAKOTA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bismarck MSA	51.18	4	26.67	0.00	0.00	100.00	0.00	7	33.33	0.00	0.00	100.00	0.00	3.60	7.95	69.18	19.27
Limited Review:																	
ND NonMSA Total	48.82	11	73.33	0.00	9.09	90.91	0.00	14	66.67	0.00	14.29	85.71	0.00	0.00	5.14	84.10	10.77

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF OHIO												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cleveland-Elyria MSA	23.42	7,523	865,841	12,165	271,251	53	523	10	62,557	19,751	1,200,172	33.62
Columbus MSA 2012-2013	14.41	6,919	956,375	5,201	114,100	32	697	2	482	12,154	1,071,654	10.45
Columbus MSA 2014-2015	11.59	4,276	569,842	5,398	99,123	101	683	2	6,150	9,777	675,798	10.92
Limited Review:												
Akron MSA	7.21	3,135	338,580	2,930	74,143	14	182	2	87,662	6,081	500,567	4.02
Canton-Massillon MSA	3.35	1,504	164,038	1,302	16,587	17	97	0	0	2,823	180,722	0.78
Dayton MSA 2012-2013	7.81	3,022	341,236	3,440	85,420	120	13,460	3	6,676	6,585	446,792	6.77
Dayton MSA 2014-2015	6.05	1,604	201,924	3,372	88,260	124	5,644	1	6,550	5,101	302,378	6.39
Huntington-Ashland MSA 2012-2013	0.49	223	17,200	178	2,652	10	113	0	0	411	19,965	1.05
Huntington-Ashland MSA 2014-2015	0.46	144	10,936	225	2,287	15	294	0	0	384	13,517	1.05
Lima MSA	0.75	150	13,968	477	11,848	8	86	0	0	635	25,902	0.71
Mansfield MSA	1.43	379	30,257	793	8,321	32	229	1	1,917	1,205	40,724	0.88
Sandusky MSA 2012-2013	0.64	236	24,825	303	5,605	4	110	0	0	543	30,540	0.34
Springfield MSA	1.68	540	53,504	843	8,427	35	176	0	0	1,418	62,107	0.11
Toledo MSA 2012-2013	0.32	115	14,240	153	2,669	1	5	0	0	269	16,914	0.45
Weirton-Steubenville MSA	1.27	678	52,195	379	5,283	11	137	0	0	1,068	57,615	1.25
Youngstown-Warren-Boardman MSA	3.23	936	88,904	1,769	17,866	20	214	2	13,045	2,727	120,029	0.48
OH NonMSA Total 2012-2013	7.86	2,904	263,181	3,579	67,078	146	9,053	0	0	6,629	339,312	10.01
OH NonMSA Total 2014-2015	8.02	2,016	184,513	4,306	72,730	438	18,469	2	3,277	6,762	278,989	10.72
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	2	2,500	2	2,500	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	1	667	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.

*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Cleveland-Elyria MSA	3,049	19.47	5.68	2.95	13.81	14.82	41.98	51.98	38.53	30.24	2.68	4.25	3.83	3.36	1.73
Columbus MSA 2012-2013	3,209	20.50	5.60	3.55	18.51	22.03	39.69	45.78	36.20	28.64	4.79	6.53	7.92	5.69	3.03
Columbus MSA 2014-2015	2,790	17.82	4.85	4.19	19.39	23.66	37.00	42.04	38.76	30.11	4.45	6.53	7.01	5.29	2.91
Limited Review:															
Akron MSA	1,626	10.39	4.58	2.71	18.89	22.57	42.20	50.80	34.33	23.92	3.80	6.00	6.15	4.42	2.34
Canton-Massillon MSA	663	4.23	3.09	0.60	9.84	5.58	60.24	60.78	26.83	33.03	2.71	5.56	2.32	2.53	3.01
Dayton MSA 2012-2013	725	4.63	4.19	1.10	17.48	10.48	46.91	52.00	31.42	36.41	2.88	2.50	2.91	3.21	2.50
Dayton MSA 2014-2015	724	4.62	4.44	0.97	18.39	17.82	44.16	48.76	33.02	32.46	4.02	2.73	6.13	4.55	2.88
Huntington-Ashland MSA 2012-2013	26	0.17	0.00	0.00	14.91	15.38	85.09	84.62	0.00	0.00	1.86	0.00	1.79	1.86	0.00
Huntington-Ashland MSA 2014-2015	25	0.16	0.00	0.00	22.86	20.00	77.14	80.00	0.00	0.00	2.74	0.00	2.06	2.87	0.00
Lima MSA	61	0.39	5.60	0.00	10.43	3.28	51.30	68.85	32.67	27.87	1.64	0.00	1.43	1.79	1.54
Mansfield MSA	119	0.76	0.00	0.00	20.04	15.13	49.63	48.74	30.33	36.13	2.12	0.00	1.65	2.09	2.28
Sandusky MSA 2012-2013	57	0.36	0.00	0.00	22.76	21.05	51.83	56.14	25.41	22.81	3.32	0.00	6.77	3.31	1.89
Springfield MSA	245	1.56	4.94	2.04	12.97	17.96	44.52	46.12	37.57	33.88	4.39	7.50	7.57	4.42	3.33
Toledo MSA 2012-2013	27	0.17	0.00	0.00	0.00	0.00	56.26	81.48	43.74	18.52	1.82	0.00	0.00	2.22	1.28
Weirton-Steubenville MSA	244	1.56	1.24	0.00	11.58	9.43	83.35	87.30	3.84	3.28	10.53	0.00	10.53	10.82	6.06
Youngstown-Warren-Boardman MSA	578	3.69	5.33	0.00	13.31	6.92	55.54	65.92	25.82	27.16	3.14	0.00	2.50	3.65	2.47
OH NonMSA Total 2012-2013	725	4.63	0.99	1.38	12.85	9.93	70.73	69.66	15.43	19.03	4.16	13.04	3.66	4.16	4.21
OH NonMSA Total 2014-2015	764	4.88	0.89	0.92	12.41	9.16	67.15	70.16	19.55	19.76	4.10	6.45	3.33	4.50	3.31

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cleveland-Elyria MSA	382	19.00	5.68	2.62	13.81	15.45	41.98	45.03	38.53	36.91	4.03	3.13	3.67	4.79	3.53
Columbus MSA 2012-2013	164	8.16	5.60	1.83	18.51	12.80	39.69	45.73	36.20	39.63	5.06	2.82	4.08	5.64	5.04
Columbus MSA 2014-2015	211	10.50	4.85	2.84	19.39	21.33	37.00	34.60	38.76	41.23	4.62	4.40	5.51	4.19	4.64
Limited Review:															
Akron MSA	110	5.47	4.58	3.64	18.89	18.18	42.20	50.00	34.33	28.18	4.57	3.03	4.32	7.33	2.22
Canton-Massillon MSA	52	2.59	3.09	1.92	9.84	7.69	60.24	57.69	26.83	32.69	3.15	0.00	3.03	3.29	3.36
Dayton MSA 2012-2013	110	5.47	4.19	2.73	17.48	13.64	46.91	40.00	31.42	43.64	6.20	5.26	5.98	5.52	7.23
Dayton MSA 2014-2015	99	4.93	4.44	0.00	18.39	14.14	44.16	55.56	33.02	30.30	6.11	0.00	5.93	6.19	6.52
Huntington-Ashland MSA 2012-2013	38	1.89	0.00	0.00	14.91	15.79	85.09	84.21	0.00	0.00	13.64	0.00	23.08	12.77	0.00
Huntington-Ashland MSA 2014-2015	41	2.04	0.00	0.00	22.86	21.95	77.14	78.05	0.00	0.00	11.49	0.00	14.71	10.53	0.00
Lima MSA	9	0.45	5.60	0.00	10.43	0.00	51.30	66.67	32.67	33.33	1.74	0.00	0.00	2.78	0.00
Mansfield MSA	41	2.04	0.00	0.00	20.04	4.88	49.63	65.85	30.33	29.27	5.31	0.00	0.00	4.46	7.95
Sandusky MSA 2012-2013	11	0.55	0.00	0.00	22.76	36.36	51.83	36.36	25.41	27.27	4.86	0.00	8.82	2.70	5.56
Springfield MSA	16	0.80	4.94	0.00	12.97	6.25	44.52	56.25	37.57	37.50	2.13	0.00	0.00	2.86	2.13
Toledo MSA 2012-2013	11	0.55	0.00	0.00	0.00	0.00	56.26	81.82	43.74	18.18	8.70	0.00	0.00	16.13	2.63
Weirton-Steubenville MSA	82	4.08	1.24	0.00	11.58	12.20	83.35	86.59	3.84	1.22	6.33	0.00	6.67	6.62	0.00
Youngstown-Warren-Boardman MSA	26	1.29	5.33	3.85	13.31	0.00	55.54	76.92	25.82	19.23	1.74	6.67	0.00	2.43	0.50
OH NonMSA Total 2012-2013	318	15.82	0.99	2.83	12.85	13.21	70.73	65.41	15.43	18.55	14.33	22.22	19.85	13.07	15.90
OH NonMSA Total 2014-2015	289	14.38	0.89	1.38	12.41	15.92	67.15	65.40	19.55	17.30	10.78	14.29	17.35	9.57	10.46

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cleveland-Elyria MSA	4,050	21.87	5.68	1.85	13.81	9.53	41.98	46.99	38.53	41.63	3.25	3.21	4.35	3.84	2.60
Columbus MSA 2012-2013	3,536	19.10	5.60	2.86	18.51	13.07	39.69	37.90	36.20	46.18	3.69	4.72	4.50	4.15	3.01
Columbus MSA 2014-2015	1268	6.85	4.85	2.37	19.39	17.90	37.00	38.80	38.76	40.93	2.91	2.56	3.53	3.20	2.57
Limited Review:															
Akron MSA	1,393	7.52	4.58	2.23	18.89	19.10	42.20	44.29	34.33	34.39	3.14	4.32	4.06	3.98	2.02
Canton-Massillon MSA	783	4.23	3.09	0.38	9.84	5.49	60.24	61.17	26.83	32.95	3.33	5.41	2.98	3.22	3.55
Dayton MSA 2012-2013	2,174	11.74	4.19	1.06	17.48	11.82	46.91	46.78	31.42	40.34	5.44	2.88	5.67	5.95	4.91
Dayton MSA 2014-2015	760	4.10	4.44	0.39	18.39	15.53	44.16	52.63	33.02	31.45	4.94	0.74	5.58	6.07	3.74
Huntington-Ashland MSA 2012-2013	159	0.86	0.00	0.00	14.91	12.58	85.09	87.42	0.00	0.00	8.81	0.00	14.44	8.12	0.00
Huntington-Ashland MSA 2014-2015	78	0.42	0.00	0.00	22.86	21.79	77.14	78.21	0.00	0.00	9.67	0.00	10.84	9.43	0.00
Lima MSA	80	0.43	5.60	1.25	10.43	1.25	51.30	72.50	32.67	25.00	1.33	4.35	0.00	2.01	0.40
Mansfield MSA	219	1.18	0.00	0.00	20.04	8.22	49.63	50.68	30.33	41.10	4.16	0.00	3.53	3.64	4.98
Sandusky MSA 2012-2013	168	0.91	0.00	0.00	22.76	25.00	51.83	48.21	25.41	26.79	6.25	0.00	9.02	6.07	5.14
Springfield MSA	279	1.51	4.94	1.43	12.97	7.17	44.52	42.65	37.57	48.75	3.30	0.00	3.70	2.87	3.78
Toledo MSA 2012-2013	73	0.39	0.00	0.00	0.00	0.00	56.26	64.38	43.74	35.62	3.78	0.00	0.00	5.09	2.50
Weirton-Steubenville MSA	351	1.90	1.24	0.00	11.58	9.40	83.35	87.46	3.84	3.13	14.71	0.00	11.11	15.30	11.54
Youngstown-Warren-Boardman MSA	329	1.78	5.33	0.91	13.31	5.78	55.54	58.66	25.82	34.65	1.37	6.90	1.40	1.49	1.03
OH NonMSA Total 2012-2013	1,857	10.03	0.99	0.86	12.85	9.59	70.73	67.15	15.43	22.40	6.49	8.64	6.48	6.18	7.60
OH NonMSA Total 2014-2015	959	5.18	0.89	1.36	12.41	12.41	67.15	64.65	19.55	21.58	6.40	19.35	8.76	6.18	5.88

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Cleveland-Elyria MSA	42	34.71	15.05	16.67	27.16	33.33	38.98	38.10	18.81	11.90	7.07	12.50	6.82	7.06	3.23
Columbus MSA 2012-2013	10	8.26	22.86	30.00	27.72	30.00	32.49	30.00	16.93	10.00	2.69	3.85	2.94	2.22	2.00
Columbus MSA 2014-2015	7	5.79	21.82	42.86	27.98	28.57	31.38	28.57	18.81	0.00	1.33	0.00	4.08	1.25	0.00
Limited Review:															
Akron MSA	6	4.96	15.36	16.67	23.22	33.33	36.44	50.00	24.98	0.00	1.37	10.00	0.00	0.00	0.00
Canton-Massillon MSA	6	4.96	12.01	0.00	13.54	0.00	42.53	83.33	31.92	16.67	4.00	0.00	0.00	0.00	25.00
Dayton MSA 2012-2013	13	10.74	10.51	7.69	27.55	38.46	42.12	38.46	19.81	15.38	6.67	0.00	10.00	6.67	0.00
Dayton MSA 2014-2015	21	17.36	10.65	4.76	27.74	33.33	41.68	38.10	19.94	23.81	17.44	0.00	27.27	13.16	19.05
Huntington-Ashland MSA 2012-2013	0	0.00	0.00	0.00	46.20	0.00	53.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Huntington-Ashland MSA 2014-2015	0	0.00	0.00	0.00	47.90	0.00	52.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Lima MSA	0	0.00	13.42	0.00	21.23	0.00	54.92	0.00	10.43	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield MSA	0	0.00	0.00	0.00	45.41	0.00	40.13	0.00	14.46	0.00	0.00	0.00	0.00	0.00	0.00
Sandusky MSA 2012-2013	0	0.00	0.00	0.00	38.62	0.00	39.34	0.00	22.04	0.00	0.00	0.00	0.00	0.00	0.00
Springfield MSA	0	0.00	18.92	0.00	15.56	0.00	45.05	0.00	20.47	0.00	0.00	0.00	0.00	0.00	0.00
Toledo MSA 2012-2013	4	3.31	0.00	0.00	0.00	0.00	76.05	100.00	23.95	0.00	0.00	0.00	0.00	0.00	0.00
Weirton-Steubenville MSA	1	0.83	21.26	0.00	25.17	0.00	45.45	100.00	8.12	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman MSA	3	2.48	12.17	0.00	21.29	33.33	49.03	0.00	17.50	66.67	0.00	0.00	0.00	0.00	0.00
OH NonMSA Total 2012-2013	4	3.31	7.21	0.00	21.63	25.00	58.16	50.00	13.00	25.00	6.67	0.00	11.11	3.85	11.11
OH NonMSA Total 2014-2015	4	3.31	5.86	0.00	20.66	50.00	55.21	50.00	18.27	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Elyria MSA	12,138	25.95	7.53	7.09	13.00	12.61	38.46	39.80	40.64	40.51	9.58	9.71	10.30	10.71	8.52
Columbus MSA 2012-2013	5,201	11.12	9.34	7.34	19.53	18.98	34.28	33.66	36.51	40.02	10.66	4.37	13.71	12.06	10.72
Columbus MSA 2014-2015	5,389	11.52	8.06	8.02	20.30	18.35	31.67	31.82	39.62	41.81	9.49	11.22	7.18	10.85	9.32
Limited Review:															
Akron MSA	2,930	6.26	7.48	6.69	16.15	17.37	36.08	38.19	40.30	37.75	7.95	8.52	8.34	9.09	6.77
Canton-Massillon MSA	1,302	2.78	6.47	4.45	9.38	4.99	52.56	61.60	31.59	28.96	7.49	2.82	6.46	8.46	6.66
Dayton MSA 2012-2013	3,440	7.35	6.15	3.20	17.91	17.73	44.03	47.12	31.87	31.95	17.32	6.64	18.72	19.18	15.28
Dayton MSA 2014-2015	3,371	7.21	6.53	2.94	18.17	18.54	42.00	44.38	33.26	34.14	16.87	8.08	17.75	18.47	15.74
Huntington-Ashland MSA 2012-2013	178	0.38	0.00	0.00	21.99	21.35	78.01	78.65	0.00	0.00	19.14	0.00	25.86	18.00	0.00
Huntington-Ashland MSA 2014-2015	225	0.48	0.00	0.00	30.54	23.11	69.46	76.89	0.00	0.00	17.83	0.00	15.04	18.50	0.00
Lima MSA	477	1.02	14.78	8.39	11.21	7.13	48.06	51.36	25.95	33.12	11.21	7.10	11.76	11.93	11.93
Mansfield MSA	793	1.70	0.00	0.00	27.34	22.95	45.15	45.40	27.51	31.65	14.14	0.00	11.60	14.78	14.72
Sandusky MSA 2012-2013	303	0.65	0.00	0.00	24.42	33.33	50.37	44.88	25.21	21.78	14.61	0.00	21.03	13.58	11.24
Springfield MSA	843	1.80	8.32	4.74	17.66	18.27	34.31	32.98	39.71	44.01	14.44	8.82	15.35	15.29	13.14
Toledo MSA 2012-2013	153	0.33	0.00	0.00	0.00	0.00	61.72	78.43	38.28	21.57	17.51	0.00	0.00	24.02	8.25
Weirton-Steubenville MSA	379	0.81	11.78	3.17	10.08	12.93	71.12	82.59	7.02	1.32	12.68	4.60	29.63	12.96	2.44
Youngstown-Warren-Boardman MSA	1,769	3.78	7.97	4.86	11.92	9.16	47.82	48.73	32.29	37.25	9.35	5.34	8.48	9.67	9.51
OH NonMSA Total 2012-2013	3,579	7.65	2.05	3.63	14.64	13.86	68.82	63.79	14.50	18.72	20.54	33.65	18.54	19.57	23.19
OH NonMSA Total 2014-2015	4,306	9.21	1.94	1.97	14.63	14.38	64.48	62.87	18.95	20.78	20.52	20.71	22.06	19.97	19.88

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cleveland-Elyria MSA	53	4.49	2.54	1.89	7.81	5.66	44.44	43.40	45.17	49.06	18.10	50.00	50.00	19.30	10.00
Columbus MSA 2012-2013	32	2.71	3.67	0.00	14.89	28.13	51.67	53.13	29.73	18.75	5.52	0.00	10.81	4.92	4.41
Columbus MSA 2014-2015	101	8.55	3.05	0.99	14.60	14.85	48.19	60.40	34.10	23.76	10.42	0.00	7.69	11.40	10.00
Limited Review:															
Akron MSA	14	1.19	1.44	14.29	12.49	7.14	50.76	71.43	35.31	7.14	28.57	100.00	100.00	27.27	0.00
Canton-Massillon MSA	17	1.44	1.26	0.00	5.72	0.00	70.79	82.35	22.22	17.65	10.14	0.00	0.00	10.20	15.38
Dayton MSA 2012-2013	120	10.16	1.49	0.00	9.25	1.67	61.85	81.67	27.41	16.67	21.25	0.00	8.33	25.37	12.16
Dayton MSA 2014-2015	124	10.50	1.93	0.00	10.30	2.42	56.49	66.94	31.28	30.65	28.02	0.00	18.18	29.60	27.54
Huntington-Ashland MSA 2012-2013	10	0.85	0.00	0.00	9.66	10.00	90.34	90.00	0.00	0.00	71.43	0.00	50.00	80.00	0.00
Huntington-Ashland MSA 2014-2015	15	1.27	0.00	0.00	14.86	0.00	85.14	100.00	0.00	0.00	60.00	0.00	0.00	66.67	0.00
Lima MSA	8	0.68	1.69	0.00	1.69	0.00	78.27	50.00	18.35	50.00	2.26	0.00	0.00	0.86	11.76
Mansfield MSA	32	2.71	0.00	0.00	6.19	0.00	60.09	62.50	33.72	37.50	16.33	0.00	0.00	16.67	15.38
Sandusky MSA 2012-2013	4	0.34	0.00	0.00	7.37	0.00	60.26	50.00	32.37	50.00	7.69	0.00	0.00	14.29	0.00
Springfield MSA	35	2.96	2.49	0.00	4.52	0.00	33.48	25.71	59.50	74.29	2.54	0.00	0.00	0.00	3.66
Toledo MSA 2012-2013	1	0.08	0.00	0.00	0.00	0.00	48.69	0.00	51.31	100.00	6.67	0.00	0.00	0.00	7.69
Weirton-Steubenville MSA	11	0.93	1.41	0.00	8.45	0.00	89.44	100.00	0.70	0.00	18.18	0.00	0.00	33.33	0.00
Youngstown-Warren-Boardman MSA	20	1.69	2.15	0.00	5.39	0.00	66.52	70.00	25.94	30.00	19.57	0.00	0.00	21.62	11.11
OH NonMSA Total 2012-2013	146	12.36	0.24	0.00	5.83	4.11	70.39	70.55	23.54	25.34	8.85	0.00	16.67	8.23	10.05
OH NonMSA Total 2014-2015	438	37.09	0.20	0.00	5.75	5.02	68.62	72.60	25.44	22.37	18.56	0.00	21.95	19.37	15.96

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Cleveland-Elyria MSA	3,049	19.47	21.71	10.34	17.29	26.23	20.69	28.17	40.30	35.27	0.88	1.00	0.95	1.04	0.70
Columbus MSA 2012-2013	3,209	20.50	21.84	9.54	17.39	22.74	20.60	25.92	40.16	41.81	0.68	0.81	0.50	0.73	0.73
Columbus MSA 2014-2015	2,790	17.82	21.30	8.59	17.24	26.58	20.72	25.77	40.74	39.06	0.94	1.02	1.03	0.93	0.88
Limited Review:															
Akron MSA	1,626	10.39	20.77	12.06	17.80	26.07	22.01	29.18	39.42	32.68	0.90	0.58	1.23	0.73	0.88
Canton-Massillon MSA	663	4.23	19.27	8.76	19.02	26.28	21.68	32.12	40.03	32.85	0.98	0.50	1.16	0.97	0.98
Dayton MSA 2012-2013	725	4.63	20.69	9.73	18.19	29.65	20.91	25.22	40.21	35.40	1.07	1.49	1.28	1.10	0.84
Dayton MSA 2014-2015	724	4.62	20.98	11.47	18.16	25.69	20.62	22.02	40.24	40.83	1.33	1.79	1.72	1.09	1.15
Huntington-Ashland MSA 2012-2013	26	0.17	22.98	14.29	18.60	28.57	21.43	21.43	36.99	35.71	0.80	0.00	0.97	0.68	0.95
Huntington-Ashland MSA 2014-2015	25	0.16	23.64	13.33	19.27	33.33	21.68	33.33	35.41	20.00	1.83	3.57	1.72	2.90	0.95
Lima MSA	61	0.39	21.47	13.64	17.45	22.73	22.40	50.00	38.69	13.64	0.89	0.00	1.37	1.98	0.00
Mansfield MSA	119	0.76	18.37	4.55	20.51	36.36	21.55	40.91	39.57	18.18	0.82	0.00	1.82	1.37	0.00
Sandusky MSA 2012-2013	57	0.36	18.85	13.33	20.51	33.33	20.74	13.33	39.89	40.00	0.73	1.72	1.60	0.44	0.29
Springfield MSA	245	1.56	19.82	6.45	17.52	29.03	22.90	25.81	39.76	38.71	0.67	0.84	0.79	0.53	0.63
Toledo MSA 2012-2013	27	0.17	16.13	5.88	16.76	23.53	22.29	17.65	44.82	52.94	1.19	5.56	2.04	1.01	0.69
Weirton-Steubenville MSA	244	1.56	20.21	9.85	18.42	29.06	22.34	37.44	39.04	23.65	9.28	10.26	8.84	13.04	5.88
Youngstown-Warren-Boardman MSA	578	3.69	20.65	9.71	17.85	27.18	22.02	22.33	39.48	40.78	0.62	0.32	0.73	0.49	0.71
OH NonMSA Total 2012-2013	725	4.63	19.60	9.02	18.15	22.55	22.68	29.71	39.58	38.73	2.38	1.91	1.65	2.69	2.85
OH NonMSA Total 2014-2015	764	4.88	18.88	10.18	17.96	26.77	22.54	29.65	40.62	33.41	2.89	3.57	2.91	2.85	2.71

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cleveland-Elyria MSA	382	19.00	21.71	13.39	17.29	24.59	20.69	29.51	40.30	32.51	3.97	3.59	4.56	5.91	2.82
Columbus MSA 2012-2013	164	8.16	21.84	11.81	17.39	25.00	20.60	20.83	40.16	42.36	4.32	6.49	5.21	4.02	3.64
Columbus MSA 2014-2015	211	10.50	21.30	9.18	17.24	24.15	20.72	24.15	40.74	42.51	4.98	4.58	7.00	4.87	4.26
Limited Review:															
Akron MSA	110	5.47	20.77	11.43	17.80	30.48	22.01	26.67	39.42	31.43	4.52	2.86	7.74	5.03	3.29
Canton-Massillon MSA	52	2.59	19.27	9.09	19.02	20.45	21.68	25.00	40.03	45.45	3.10	0.86	4.11	3.95	3.02
Dayton MSA 2012-2013	110	5.47	20.69	17.43	18.19	21.10	20.91	23.85	40.21	37.61	6.46	11.90	7.38	6.07	5.28
Dayton MSA 2014-2015	99	4.93	20.98	9.28	18.16	26.80	20.62	28.87	40.24	35.05	6.14	4.65	6.72	8.82	4.91
Huntington-Ashland MSA 2012-2013	38	1.89	22.98	7.89	18.60	23.68	21.43	36.84	36.99	31.58	14.00	5.00	17.86	20.45	10.34
Huntington-Ashland MSA 2014-2015	41	2.04	23.64	9.76	19.27	19.51	21.68	26.83	35.41	43.90	11.64	9.09	12.90	11.63	11.48
Lima MSA	9	0.45	21.47	11.11	17.45	22.22	22.40	22.22	38.69	44.44	1.87	0.00	0.00	0.00	4.35
Mansfield MSA	41	2.04	18.37	12.50	20.51	25.00	21.55	30.00	39.57	32.50	5.53	13.64	6.98	5.88	2.38
Sandusky MSA 2012-2013	11	0.55	18.85	9.09	20.51	54.55	20.74	27.27	39.89	9.09	5.04	0.00	17.86	3.03	1.49
Springfield MSA	16	0.80	19.82	20.00	17.52	20.00	22.90	26.67	39.76	33.33	2.25	3.45	1.96	2.22	2.06
Toledo MSA 2012-2013	11	0.55	16.13	18.18	16.76	0.00	22.29	36.36	44.82	45.45	8.70	25.00	0.00	11.11	7.14
Weirton-Steubenville MSA	82	4.08	20.21	15.19	18.42	15.19	22.34	30.38	39.04	39.24	6.58	10.00	0.00	4.55	10.45
Youngstown-Warren-Boardman MSA	26	1.29	20.65	3.85	17.85	15.38	22.02	11.54	39.48	69.23	1.81	0.00	1.42	0.58	3.15
OH NonMSA Total 2012-2013	318	15.82	19.60	11.43	18.15	22.54	22.68	28.25	39.58	37.78	14.50	16.18	15.99	14.60	13.13
OH NonMSA Total 2014-2015	289	14.38	18.88	11.35	17.96	23.76	22.54	27.30	40.62	37.59	10.89	10.99	11.78	12.13	9.60

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cleveland-Elyria MSA	4,050	21.87	21.71	8.77	17.29	23.24	20.69	28.99	40.30	38.99	3.73	4.78	4.66	4.10	3.04
Columbus MSA 2012-2013	3,536	19.10	21.84	9.12	17.39	24.03	20.60	28.13	40.16	38.71	3.64	5.60	5.64	4.30	2.41
Columbus MSA 2014-2015	1,268	6.85	21.30	9.08	17.24	23.04	20.72	30.98	40.74	36.90	2.95	3.02	3.57	4.08	2.19
Limited Review:															
Akron MSA	1,393	7.52	20.77	10.29	17.80	27.31	22.01	27.47	39.42	34.93	3.35	3.85	4.65	2.70	3.09
Canton-Massillon MSA	783	4.23	19.27	8.22	19.02	20.62	21.68	29.30	40.03	41.86	3.62	2.81	3.92	3.02	4.03
Dayton MSA 2012-2013	2,174	11.74	20.69	9.78	18.19	21.98	20.91	26.06	40.21	42.18	5.84	7.55	7.21	6.32	4.94
Dayton MSA 2014-2015	760	4.10	20.98	9.99	18.16	22.78	20.62	26.58	40.24	40.65	6.10	7.22	8.06	6.45	5.00
Huntington-Ashland MSA 2012-2013	159	0.86	22.98	9.59	18.60	23.29	21.43	26.03	36.99	41.10	8.71	16.67	16.33	8.78	5.82
Huntington-Ashland MSA 2014-2015	78	0.42	23.64	8.11	19.27	25.68	21.68	21.62	35.41	44.59	11.34	11.43	18.46	9.62	9.78
Lima MSA	80	0.43	21.47	5.97	17.45	11.94	22.40	43.28	38.69	38.81	1.24	2.33	0.77	2.60	0.42
Mansfield MSA	219	1.18	18.37	10.00	20.51	22.50	21.55	29.50	39.57	38.00	5.11	2.04	3.57	8.51	4.11
Sandusky MSA 2012-2013	168	0.91	18.85	9.62	20.51	23.72	20.74	29.49	39.89	37.18	6.35	9.47	9.13	9.01	3.97
Springfield MSA	279	1.51	19.82	11.36	17.52	16.36	22.90	25.00	39.76	47.27	3.02	5.56	4.05	2.38	2.64
Toledo MSA 2012-2013	73	0.39	16.13	9.09	16.76	24.24	22.29	24.24	44.82	42.42	3.60	4.55	5.84	5.18	2.35
Weirton-Steubenville MSA	351	1.90	20.21	7.12	18.42	19.50	22.34	30.03	39.04	43.34	16.58	23.08	16.90	10.99	18.23
Youngstown-Warren-Boardman MSA	329	1.78	20.65	7.86	17.85	19.21	22.02	33.62	39.48	39.30	1.45	1.50	1.81	1.75	1.12
OH NonMSA Total 2012-2013	1,857	10.03	19.60	5.87	18.15	18.53	22.68	30.32	39.58	45.28	6.84	6.20	6.83	7.74	6.43
OH NonMSA Total 2014-2015	959	5.18	18.88	8.86	17.96	22.81	22.54	27.69	40.62	40.64	7.18	7.78	8.56	7.13	6.45

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF OHIO									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland-Elyria MSA	12,165	25.99	77.40	55.53	96.48	1.69	1.83	9.58	11.87
Columbus MSA 2012-2013	5,201	11.11	69.06	53.68	96.56	1.58	1.87	10.66	15.51
Columbus MSA 2014-2015	5,398	11.53	77.65	59.34	97.00	1.87	1.13	9.49	14.29
Limited Review:									
Akron MSA	2,930	6.26	78.38	56.14	96.11	1.64	2.25	7.95	10.82
Canton-Massillon MSA	1,302	2.78	77.89	56.14	98.31	1.38	0.31	7.49	11.55
Dayton MSA 2012-2013	3,440	7.35	71.96	55.78	95.58	2.15	2.27	17.32	24.50
Dayton MSA 2014-2015	3,372	7.20	77.25	58.01	95.58	1.96	2.46	16.87	22.25
Huntington-Ashland MSA 2012-2013	178	0.38	71.85	71.35	98.31	1.12	0.56	19.14	30.15
Huntington-Ashland MSA 2014-2015	225	0.48	77.95	70.67	100.00	0.00	0.00	17.83	24.60
Lima MSA	477	1.02	73.94	49.27	97.06	0.84	2.10	11.21	19.09
Mansfield MSA	793	1.69	75.51	53.85	99.37	0.25	0.38	14.14	18.15
Sandusky MSA 2012-2013	303	0.65	69.86	61.72	97.69	0.33	1.98	14.61	21.09
Springfield MSA	843	1.80	76.97	48.04	98.70	0.95	0.36	14.44	14.27
Toledo MSA 2012-2013	153	0.33	72.40	58.82	96.73	3.27	0.00	17.51	23.26
Weirton-Steubenville MSA	379	0.81	74.64	68.34	98.68	0.79	0.53	12.68	20.49
Youngstown-Warren-Boardman MSA	1,769	3.78	77.48	70.21	99.43	0.23	0.34	9.35	15.44
OH NonMSA Total 2012-2013	3,579	7.65	71.84	57.31	97.32	1.70	0.98	20.54	27.42
OH NonMSA Total 2014-2015	4,306	9.20	77.15	57.78	97.86	1.21	0.93	20.52	25.54

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF OHIO Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cleveland-Elyria MSA	53	4.49	96.73	58.49	100.00	0.00	0.00	18.10	29.55
Columbus MSA 2012-2013	32	2.71	97.38	56.25	93.75	6.25	0.00	5.52	7.69
Columbus MSA 2014-2015	101	8.55	96.89	59.41	100.00	0.00	0.00	10.42	17.09
Limited Review:									
Akron MSA	14	1.19	97.33	57.14	100.00	0.00	0.00	28.57	40.00
Canton-Massillon MSA	17	1.44	98.23	76.47	100.00	0.00	0.00	10.14	16.67
Dayton MSA 2012-2013	120	10.16	98.25	69.17	57.50	28.33	14.17	21.25	22.86
Dayton MSA 2014-2015	124	10.50	97.48	71.77	82.26	12.10	5.65	28.02	38.18
Huntington-Ashland MSA 2012-2013	10	0.85	99.43	100.00	100.00	0.00	0.00	71.43	100.00
Huntington-Ashland MSA 2014-2015	15	1.27	97.30	73.33	100.00	0.00	0.00	60.00	100.00
Lima MSA	8	0.68	98.73	75.00	100.00	0.00	0.00	2.26	3.19
Mansfield MSA	32	2.71	98.39	68.75	100.00	0.00	0.00	16.33	21.43
Sandusky MSA 2012-2013	4	0.34	98.40	75.00	100.00	0.00	0.00	7.69	0.00
Springfield MSA	35	2.96	98.42	62.86	100.00	0.00	0.00	2.54	4.29
Toledo MSA 2012-2013	1	0.08	98.37	100.00	100.00	0.00	0.00	6.67	10.00
Weirton-Steubenville MSA	11	0.93	98.59	81.82	100.00	0.00	0.00	18.18	25.00
Youngstown-Warren-Boardman MSA	20	1.69	98.11	85.00	100.00	0.00	0.00	19.57	33.33
OH NonMSA Total 2012-2013	146	12.36	99.09	75.34	80.14	16.44	3.42	8.85	11.15
OH NonMSA Total 2014-2015	438	37.09	98.83	67.35	86.53	10.73	2.74	18.56	24.26

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF OHIO Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cleveland-Elyria MSA	53	21,164	481	67,412	534	88,576	32.52	3	103
Columbus MSA 2012-2013	154	11,514	220	11,207	374	22,721	8.34	1	191
Columbus MSA 2014-2015	39	4,249	209	20,122	248	24,371	8.95	0	0
Limited Review:									
Akron MSA	5	290	176	15,992	181	16,282	5.98	1	5,042
Canton-Massillon MSA	9	4,441	55	2,983	64	7,424	2.73	1	6,749
Dayton MSA 2012-2013	78	7,253	137	6,115	215	13,368	4.91	3	10,600
Dayton MSA 2014-2015	33	3,315	126	10,692	159	14,007	5.14	0	0
Huntington-Ashland MSA 2012-2013	15	935	18	924	33	1,859	0.68	0	0
Huntington-Ashland MSA 2014-2015	12	928	11	643	23	1,571	0.58	0	0
Lima MSA	7	260	23	2,283	30	2,543	0.93	0	0
Mansfield MSA	4	96	28	1,026	32	1,122	0.41	0	0
Sandusky MSA 2012-2013	7	397	6	306	13	703	0.26	0	0
Springfield MSA	7	198	57	3,270	64	3,468	1.27	0	0
Toledo MSA 2012-2013	11	678	4	124	15	802	0.29	0	0
Weirton-Steubenville MSA	8	287	36	878	44	1,165	0.43	0	0
Youngstown-Warren-Boardman MSA	8	290	134	27,051	142	27,341	10.04	0	0
OH NonMSA Total 2012-2013	119	17,531	209	7,361	328	24,892	9.14	5	12,208
OH NonMSA Total 2014-2015	65	5,557	204	13,829	269	19,386	7.12	0	0
Statewide:									
Qualified Investments That Serve AAs	1	473	22	341	23	814	0.30	0	0
Qualified Investments Outside AAs	11	2,048	355	43,690	366	45,738	NA	2	11,775

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF OHIO																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Cleveland-Elyria MSA	33.62	59	28.10	8.47	18.64	35.59	37.29	9	15	-1	-1	-3	-1	10.38	17.42	38.71	33.49
Columbus MSA 2012-2013	10.45	41	NA	7.32	29.27	21.95	39.02	4	9	-1	-1	0	-3	11.29	21.22	36.76	30.10
Columbus MSA 2014-2015	10.92	46	21.90	6.52	26.09	26.09	39.13	3	0	0	1	1	1	10.10	21.93	34.63	32.75
Limited Review:																	
Akron MSA	4.02	13	6.19	23.08	38.46	15.38	23.08	4	11	1	-2	-2	-4	9.27	20.30	39.41	31.03
Canton-Massillon MSA	0.78	6	2.86	0.00	0.00	83.33	16.67	5	5	0	0	0	0	4.77	12.26	57.20	25.78
Dayton MSA 2012-2013	6.77	30	NA	3.33	13.33	50.00	33.33	3	4	0	-1	1	-1	6.72	21.23	44.60	27.45
Dayton MSA 2014-2015	6.39	27	12.86	3.70	11.11	51.85	33.33	0	1	0	0	0	-1	7.08	22.23	42.05	28.64
Huntington-Ashland MSA 2012-2013	1.05	5	NA	0.00	20.00	80.00	0.00	0	0	0	0	0	0	0.00	17.20	82.80	0.00
Huntington-Ashland MSA 2014-2015	1.05	5	2.38	0.00	40.00	60.00	0.00	0	0	0	0	0	0	0.00	25.14	74.86	0.00
Lima MSA	0.71	2	0.95	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.04	15.51	48.05	27.40
Mansfield MSA	0.88	3	1.43	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	27.88	45.91	26.21
Sandusky MSA 2012-2013	0.34	2	NA	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	27.81	49.20	22.99
Springfield MSA	0.11	1	0.48	0.00	0.00	0.00	100.00	0	0	0	0	0	0	10.36	16.17	41.08	32.38
Toledo MSA 2012-2013	0.45	2	NA	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	54.79	45.21
Weirton-Steubenville MSA	1.25	4	1.90	0.00	25.00	75.00	0.00	0	0	0	0	0	0	5.58	15.33	75.71	3.37
Youngstown-Warren-Boardman MSA	0.48	1	0.48	0.00	0.00	100.00	0.00	0	8	0	-2	-4	-2	8.19	15.72	52.82	23.27
OH NonMSA Total 2012-2013	10.01	41	NA	7.32	19.51	53.66	19.51	0	1	-1	0	0	0	1.88	14.00	69.74	14.38
OH NonMSA Total 2014-2015	10.72	43	20.48	6.98	20.93	53.49	18.60	0	2	0	0	-2	0	1.72	14.04	66.24	18.00

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF OHIO																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cleveland-Elyria MSA	33.62	59	28.10	8.47	18.64	35.59	37.29	85	33.60	9.41	18.82	37.65	34.12	10.38	17.42	38.71	33.49
Columbus MSA 2012-2013	10.45	41	NA	7.32	29.27	21.95	39.02	53	NA	11.32	26.42	20.75	33.96	11.29	21.22	36.76	30.10
Columbus MSA 2014-2015	10.92	46	21.90	6.52	26.09	26.09	39.13	55	21.74	5.45	25.45	25.45	36.36	10.10	21.93	34.63	32.75
Limited Review:																	
Akron MSA	4.02	13	6.19	23.08	38.46	15.38	23.08	14	5.53	28.57	35.71	14.29	21.43	9.27	20.30	39.41	31.03
Canton-Massillon MSA	0.78	6	2.86	0.00	0.00	83.33	16.67	6	2.37	0.00	0.00	83.33	16.67	4.77	12.26	57.20	25.78
Dayton MSA 2012-2013	6.77	30	NA	3.33	13.33	50.00	33.33	37	NA	5.41	16.22	48.65	29.73	6.72	21.23	44.60	27.45
Dayton MSA 2014-2015	6.39	27	12.86	3.70	11.11	51.85	33.33	34	13.44	5.88	14.71	55.88	23.53	7.08	22.23	42.05	28.64
Huntington-Ashland MSA 2012-2013	1.05	5	NA	0.00	20.00	80.00	0.00	5	NA	0.00	20.00	80.00	0.00	0.00	17.20	82.80	0.00
Huntington-Ashland MSA 2014-2015	1.05	5	2.38	0.00	40.00	60.00	0.00	5	1.98	0.00	40.00	60.00	0.00	0.00	25.14	74.86	0.00
Lima MSA	0.71	2	0.95	0.00	0.00	100.00	0.00	2	0.79	0.00	0.00	100.00	0.00	9.04	15.51	48.05	27.40
Mansfield MSA	0.88	3	1.43	0.00	0.00	66.67	33.33	3	1.19	0.00	0.00	66.67	33.33	0.00	27.88	45.91	26.21
Sandusky MSA 2012-2013	0.34	2	NA	0.00	50.00	50.00	0.00	2	NA	0.00	50.00	50.00	0.00	0.00	27.81	49.20	22.99
Springfield MSA	0.11	1	0.48	0.00	0.00	0.00	100.00	1	0.40	0.00	0.00	0.00	100.00	10.36	16.17	41.08	32.38
Toledo MSA 2012-2013	0.45	2	NA	0.00	0.00	100.00	0.00	3	NA	0.00	0.00	100.00	0.00	0.00	0.00	54.79	45.21
Weirton-Steubenville MSA	1.25	4	1.90	0.00	25.00	75.00	0.00	4	1.58	0.00	25.00	75.00	0.00	5.58	15.33	75.71	3.37
Youngstown-Warren-Boardman MSA	0.48	1	0.48	0.00	0.00	100.00	0.00	1	0.40	0.00	0.00	100.00	0.00	8.19	15.72	52.82	23.27
OH NonMSA Total 2012-2013	10.01	41	NA	7.32	19.51	53.66	19.51	40	NA	7.50	17.50	55.00	20.00	1.88	14.00	69.74	14.38
OH NonMSA Total 2014-2015	10.72	43	20.48	6.98	20.93	53.49	18.60	43	17.00	6.98	20.93	53.49	18.60	1.72	14.04	66.24	18.00

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF OREGON												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Salem MSA	20.22	3,109	498,888	5,493	119,531	314	16,154	12	24,046	8,928	658,619	18.71
Eastern OR NonMSA AA 2012-2013	9.97	1,637	203,487	2,585	77,305	177	19,050	2	3,626	4,401	303,468	11.28
Eastern OR NonMSA AA 2014-2015	8.17	789	101,622	2,319	68,266	500	17,896	2	138	3,610	187,922	10.09
Limited Review:												
Albany MSA 2014-2015	2.18	302	42,959	589	12,565	71	625	0	0	962	56,149	1.19
Bend-Redmond MSA	11.55	1,771	418,420	3,246	88,897	74	2,353	8	5,691	5,099	515,361	11.49
Corvallis MSA	3.06	532	105,116	790	13,972	27	1,676	3	852	1,352	121,616	3.06
Eugene MSA	15.86	1,967	384,883	4,889	111,549	145	4,749	4	997	7,005	502,178	15.02
Grants Pass MSA 2014-2015	1.29	118	18,963	443	10,714	10	94	0	0	571	29,771	1.58
Medford MSA	9.10	1,190	219,551	2,691	73,479	122	2,333	16	24,954	4,019	320,317	10.22
Other OR NonMSA Total 2012-2013	10.11	1,586	247,519	2,787	66,558	93	3,889	1	130	4,467	318,096	9.46
Other OR NonMSA Total 2014-2015	8.46	837	137,995	2,679	50,857	219	4,179	0	0	3,735	193,031	7.88
Statewide:												
CD Loans That Serve AAs	0.03	NA	NA	NA	NA	NA	NA	14	89,375	14	89,375	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Salem MSA	1,135	25.77	0.00	0.00	11.87	14.80	60.16	55.24	27.96	29.96	6.54	0.00	9.28	6.22	6.12
Eastern OR NonMSA AA 2012-2013	280	6.36	0.38	0.00	9.06	8.93	68.74	62.50	21.82	28.57	2.50	0.00	2.66	2.24	3.30
Eastern OR NonMSA AA 2014-2015	315	7.15	0.52	0.63	8.68	4.44	76.04	84.13	14.75	10.79	4.33	6.67	2.69	4.82	2.33
Limited Review:															
Albany MSA 2014-2015	157	3.56	0.00	0.00	10.10	18.47	75.16	59.87	14.74	21.66	5.51	0.00	7.28	4.89	6.37
Bend-Redmond MSA	771	17.50	0.00	0.00	11.80	10.77	65.01	67.57	23.20	21.66	4.89	0.00	6.70	5.31	2.57
Corvallis MSA	160	3.63	0.96	1.25	20.40	22.50	48.43	45.63	30.21	30.63	4.47	10.00	4.48	4.37	4.49
Eugene MSA	514	11.67	1.36	1.17	16.51	21.60	57.92	57.59	24.22	19.65	4.02	2.60	6.10	4.05	2.51
Grants Pass MSA 2014-2015	61	1.38	0.00	0.00	10.26	4.92	79.54	88.52	10.20	6.56	2.88	0.00	1.11	3.26	0.78
Medford MSA	475	10.78	0.22	0.21	7.54	6.74	71.50	69.47	20.74	23.58	5.10	6.67	6.42	5.21	4.30
Other OR NonMSA Total 2012-2013	238	5.40	0.00	0.00	6.82	4.62	80.38	82.35	12.80	13.03	2.44	0.00	1.33	2.41	3.21
Other OR NonMSA Total 2014-2015	299	6.79	0.00	0.00	4.30	3.34	79.48	78.60	16.22	18.06	3.82	0.00	3.24	3.77	4.17

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Salem MSA	159	17.04	0.00	0.00	11.87	10.06	60.16	57.86	27.96	32.08	9.32	0.00	6.82	10.74	7.59
Eastern OR NonMSA AA 2012-2013	145	15.54	0.38	0.00	9.06	11.72	68.74	66.90	21.82	21.38	18.74	0.00	26.67	18.18	18.18
Eastern OR NonMSA AA 2014-2015	111	11.90	0.52	0.90	8.68	3.60	76.04	80.18	14.75	15.32	16.98	100.00	22.22	16.46	17.65
Limited Review:															
Albany MSA 2014-2015	17	1.82	0.00	0.00	10.10	5.88	75.16	94.12	14.74	0.00	9.35	0.00	7.69	11.11	0.00
Bend-Redmond MSA	101	10.83	0.00	0.00	11.80	16.83	65.01	63.37	23.20	19.80	12.50	0.00	22.58	11.73	10.00
Corvallis MSA	24	2.57	0.96	0.00	20.40	12.50	48.43	62.50	30.21	25.00	7.89	0.00	0.00	10.26	8.33
Eugene MSA	118	12.65	1.36	2.54	16.51	17.80	57.92	56.78	24.22	22.88	9.73	0.00	9.09	10.70	8.33
Grants Pass MSA 2014-2015	7	0.75	0.00	0.00	10.26	14.29	79.54	85.71	10.20	0.00	1.82	0.00	33.33	1.10	0.00
Medford MSA	44	4.72	0.22	2.27	7.54	4.55	71.50	63.64	20.74	29.55	5.46	0.00	0.00	5.18	7.79
Other OR NonMSA Total 2012-2013	108	11.58	0.00	0.00	6.82	5.56	80.38	82.41	12.80	12.04	15.94	0.00	17.24	16.08	14.29
Other OR NonMSA Total 2014-2015	99	10.61	0.00	0.00	4.30	1.01	79.48	88.89	16.22	10.10	19.34	0.00	12.50	21.82	8.70

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Salem MSA	1,801	21.29	0.00	0.00	11.87	12.05	60.16	56.86	27.96	31.09	6.87	0.00	7.68	7.13	6.13
Eastern OR NonMSA AA 2012-2013	1,208	14.28	0.38	0.00	9.06	6.46	68.74	68.38	21.82	25.17	7.12	0.00	7.89	7.05	7.20
Eastern OR NonMSA AA 2014-2015	362	4.28	0.52	0.28	8.68	6.08	76.04	77.07	14.75	16.57	7.30	0.00	6.37	7.32	7.83
Limited Review:															
Albany MSA 2014-2015	127	1.50	0.00	0.00	10.10	8.66	75.16	81.10	14.74	10.24	5.76	0.00	6.25	6.43	3.24
Bend-Redmond MSA	898	10.62	0.00	0.00	11.80	8.91	65.01	64.59	23.20	26.50	4.19	0.00	5.13	3.57	5.57
Corvallis MSA	345	4.08	0.96	0.87	20.40	19.42	48.43	46.09	30.21	33.62	5.29	7.14	7.21	5.20	4.15
Eugene MSA	1,329	15.71	1.36	0.83	16.51	12.79	57.92	58.01	24.22	28.37	4.44	4.69	3.05	5.17	3.50
Grants Pass MSA 2014-2015	50	0.59	0.00	0.00	10.26	4.00	79.54	88.00	10.20	8.00	2.66	0.00	2.90	2.68	2.38
Medford MSA	666	7.87	0.22	0.00	7.54	5.11	71.50	68.17	20.74	26.73	3.47	0.00	3.59	3.36	3.80
Other OR NonMSA Total 2012-2013	1236	14.61	0.00	0.00	6.82	5.83	80.38	77.67	12.80	16.50	7.29	0.00	8.43	7.07	7.99
Other OR NonMSA Total 2014-2015	436	5.15	0.00	0.00	4.30	2.98	79.48	80.05	16.22	16.97	7.28	0.00	5.67	7.77	5.59

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Salem MSA	14	33.33	0.00	0.00	36.80	42.86	44.03	50.00	19.17	7.14	0.00	0.00	0.00	0.00	0.00
Eastern OR NonMSA AA 2012-2013	4	9.52	1.82	0.00	18.50	0.00	68.17	75.00	11.52	25.00	5.71	0.00	0.00	7.69	0.00
Eastern OR NonMSA AA 2014-2015	1	2.38	2.47	0.00	15.39	0.00	74.86	100.00	7.27	0.00	5.26	0.00	0.00	7.69	0.00
Limited Review:															
Albany MSA 2014-2015	1	2.38	0.00	0.00	33.18	100.00	55.88	0.00	10.93	0.00	7.69	0.00	16.67	0.00	0.00
Bend-Redmond MSA	1	2.38	0.00	0.00	36.60	100.00	52.56	0.00	10.84	0.00	0.00	0.00	0.00	0.00	0.00
Corvallis MSA	3	7.14	19.29	33.33	49.15	33.33	12.90	0.00	18.66	33.33	0.00	0.00	0.00	0.00	0.00
Eugene MSA	6	14.29	8.61	0.00	35.48	33.33	35.28	50.00	20.64	16.67	4.00	0.00	5.41	3.85	0.00
Grants Pass MSA 2014-2015	0	0.00	0.00	0.00	4.01	0.00	95.34	0.00	0.65	0.00	0.00	0.00	0.00	0.00	0.00
Medford MSA	5	11.90	3.57	0.00	27.55	0.00	56.62	40.00	12.25	60.00	0.00	0.00	0.00	0.00	0.00
Other OR NonMSA Total 2012-2013	4	9.52	0.00	0.00	12.28	0.00	73.48	75.00	14.24	25.00	8.57	0.00	0.00	7.41	12.50
Other OR NonMSA Total 2014-2015	3	7.14	0.00	0.00	12.99	66.67	70.27	0.00	16.74	33.33	8.33	0.00	100.00	0.00	33.33

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF OREGON															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	5,493	19.27	0.00	0.00	21.00	19.08	56.72	56.16	22.28	24.76	21.36	0.00	19.83	21.72	20.93
Eastern OR NonMSA AA 2012-2013	2,585	9.07	0.76	0.23	11.90	13.38	67.70	69.17	19.64	17.21	20.76	7.50	25.56	20.70	18.68
Eastern OR NonMSA AA 2014-2015	2,319	8.13	1.08	0.82	9.61	8.88	76.18	78.35	13.12	11.94	25.28	15.38	23.00	24.46	22.67
Limited Review:															
Albany MSA 2014-2015	589	2.07	0.00	0.00	16.61	15.79	68.48	67.91	14.91	16.30	16.98	0.00	17.65	17.10	14.91
Bend-Redmond MSA	3,246	11.39	0.00	0.00	19.14	16.67	58.13	58.78	22.73	24.55	16.68	0.00	15.08	17.22	15.50
Corvallis MSA	790	2.77	11.86	10.13	24.87	27.59	40.68	38.48	22.58	23.80	16.02	15.93	19.11	13.54	17.61
Eugene MSA	4,889	17.15	3.39	5.05	27.07	26.86	45.51	44.65	24.03	23.44	17.07	15.36	17.46	17.70	14.98
Grants Pass MSA 2014-2015	443	1.55	0.00	0.00	8.45	3.84	85.01	90.52	6.54	5.64	16.71	0.00	10.48	17.45	15.24
Medford MSA	2,691	9.44	5.32	6.95	10.86	6.91	66.95	69.75	16.87	16.39	15.02	19.65	12.63	14.96	13.14
Other OR NonMSA Total 2012-2013	2,787	9.78	0.00	0.00	8.56	7.71	76.77	74.88	14.67	17.40	24.82	0.00	22.04	23.80	27.62
Other OR NonMSA Total 2014-2015	2,679	9.40	0.00	0.00	7.38	5.86	72.84	75.07	19.78	19.07	27.02	0.00	17.75	25.93	26.30

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF OREGON															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salem MSA	314	17.92	0.00	0.00	8.07	3.18	71.77	80.25	20.16	16.56	24.09	0.00	42.86	23.86	21.67
Eastern OR NonMSA AA 2012-2013	177	10.10	0.06	0.00	8.74	11.86	68.52	70.62	22.67	17.51	8.94	0.00	13.95	7.58	10.40
Eastern OR NonMSA AA 2014-2015	500	28.54	0.09	0.00	5.45	4.00	79.02	82.20	15.44	13.80	20.53	0.00	21.05	19.55	26.15
Limited Review:															
Albany MSA 2014-2015	71	4.05	0.00	0.00	2.45	0.00	86.11	87.32	11.44	12.68	28.28	0.00	0.00	25.58	40.00
Bend-Redmond MSA	74	4.22	0.00	0.00	12.35	12.16	57.12	58.11	30.53	29.73	31.75	0.00	55.56	37.50	21.43
Corvallis MSA	27	1.54	0.91	3.70	15.07	7.41	66.67	81.48	17.35	7.41	27.27	0.00	33.33	26.83	20.00
Eugene MSA	145	8.28	1.94	0.00	14.90	7.59	63.13	72.41	20.03	20.00	45.76	0.00	63.64	46.05	40.91
Grants Pass MSA 2014-2015	10	0.57	0.00	0.00	16.15	30.00	75.64	70.00	8.22	0.00	36.36	0.00	100.00	42.86	0.00
Medford MSA	122	6.96	1.55	3.28	5.70	14.75	76.48	64.75	16.27	17.21	45.71	50.00	100.00	40.54	45.45
Other OR NonMSA Total 2012-2013	93	5.31	0.00	0.00	8.05	4.30	77.46	78.49	14.49	17.20	23.36	0.00	23.08	25.00	17.14
Other OR NonMSA Total 2014-2015	219	12.50	0.00	0.00	4.97	1.37	76.83	80.82	18.21	17.81	45.69	0.00	0.00	42.86	56.10

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Salem MSA	1,135	25.77	19.90	5.77	18.83	22.36	21.12	25.48	40.15	46.39	1.49	2.88	1.70	1.21	1.49
Eastern OR NonMSA AA 2012-2013	280	6.36	19.61	7.55	17.46	16.51	21.90	26.89	41.03	49.06	2.12	1.90	1.23	2.14	2.61
Eastern OR NonMSA AA 2014-2015	315	7.15	20.03	3.29	17.45	20.39	22.10	24.34	40.42	51.97	1.91	2.91	1.74	1.66	2.05
Limited Review:															
Albany MSA 2014-2015	157	3.56	19.96	5.88	18.54	17.65	21.73	20.59	39.78	55.88	1.36	2.56	0.60	0.74	2.12
Bend-Redmond MSA	771	17.50	19.74	3.80	17.28	10.45	23.52	15.44	39.46	70.31	1.77	2.38	0.65	0.95	2.31
Corvallis MSA	160	3.63	21.78	7.14	16.30	17.14	21.56	31.43	40.36	44.29	1.06	1.69	0.88	0.96	1.12
Eugene MSA	514	11.67	21.30	5.38	18.15	12.56	20.98	27.35	39.57	54.71	1.15	1.65	0.81	0.94	1.34
Grants Pass MSA 2014-2015	61	1.38	21.24	4.55	17.75	13.64	21.10	13.64	39.91	68.18	0.79	4.76	1.46	0.34	0.73
Medford MSA	475	10.78	19.75	3.10	18.89	13.95	20.55	24.81	40.81	58.14	0.80	0.00	0.54	0.51	1.11
Other OR NonMSA Total 2012-2013	238	5.40	21.09	5.00	19.09	13.33	21.60	17.22	38.22	64.44	2.15	1.59	1.31	1.29	2.93
Other OR NonMSA Total 2014-2015	299	6.79	20.35	5.46	19.13	13.66	21.50	15.30	39.02	65.57	2.48	3.36	2.77	1.48	2.81

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Salem MSA	159	17.04	19.90	9.15	18.83	16.34	21.12	28.76	40.15	45.75	9.25	12.50	5.66	14.71	7.77
Eastern OR NonMSA AA 2012-2013	145	15.54	19.61	6.90	17.46	22.76	21.90	22.07	41.03	48.28	19.23	26.32	21.05	19.35	17.98
Eastern OR NonMSA AA 2014-2015	111	11.90	20.03	10.09	17.45	18.35	22.10	26.61	40.42	44.95	17.68	29.73	28.89	18.28	12.30
Limited Review:															
Albany MSA 2014-2015	17	1.82	19.96	6.25	18.54	12.50	21.73	25.00	39.78	56.25	10.00	11.11	0.00	9.38	12.77
Bend-Redmond MSA	101	10.83	19.74	14.43	17.28	23.71	23.52	17.53	39.46	44.33	12.36	26.67	15.56	9.21	11.51
Corvallis MSA	24	2.57	21.78	14.29	16.30	14.29	21.56	28.57	40.36	42.86	8.11	40.00	7.69	0.00	10.71
Eugene MSA	118	12.65	21.30	11.93	18.15	29.36	20.98	15.60	39.57	43.12	9.97	21.05	6.78	6.33	11.59
Grants Pass MSA 2014-2015	7	0.75	21.24	14.29	17.75	0.00	21.10	14.29	39.91	71.43	1.83	50.00	0.00	0.00	1.59
Medford MSA	44	4.72	19.75	6.98	18.89	13.95	20.55	25.58	40.81	53.49	5.42	5.56	4.35	3.61	6.54
Other OR NonMSA Total 2012-2013	108	11.58	21.09	14.02	19.09	17.76	21.60	24.30	38.22	43.93	16.01	31.03	14.29	19.35	12.70
Other OR NonMSA Total 2014-2015	99	10.61	20.35	8.33	19.13	27.08	21.50	27.08	39.02	37.50	20.00	18.75	32.35	19.70	17.27

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF OREGON															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Salem MSA	1,801	21.29	19.90	6.31	18.83	18.49	21.12	28.77	40.15	46.44	7.99	6.47	10.12	8.36	7.39
Eastern OR NonMSA AA 2012-2013	1,208	14.28	19.61	6.11	17.46	20.07	21.90	25.36	41.03	48.45	7.91	8.15	10.29	6.48	7.84
Eastern OR NonMSA AA 2014-2015	362	4.28	20.03	6.73	17.45	19.59	22.10	26.32	40.42	47.37	9.10	12.12	11.66	9.78	7.82
Limited Review:															
Albany MSA 2014-2015	127	1.50	19.96	3.39	18.54	14.41	21.73	32.20	39.78	50.00	6.99	4.62	7.38	7.32	6.99
Bend-Redmond MSA	898	10.62	19.74	7.33	17.28	16.20	23.52	21.21	39.46	55.27	4.32	3.75	4.11	3.59	4.73
Corvallis MSA	345	4.08	21.78	10.76	16.30	17.71	21.56	25.35	40.36	46.18	4.67	4.35	3.52	5.10	4.83
Eugene MSA	1,329	15.71	21.30	6.07	18.15	17.62	20.98	24.70	39.57	51.60	5.26	4.49	5.15	5.67	5.17
Grants Pass MSA 2014-2015	50	0.59	21.24	2.08	17.75	16.67	21.10	18.75	39.91	62.50	3.40	2.86	5.68	2.35	3.40
Medford MSA	666	7.87	19.75	6.79	18.89	18.17	20.55	26.42	40.81	48.62	3.78	3.54	4.72	4.96	2.97
Other OR NonMSA Total 2012-2013	1,236	14.61	21.09	6.49	19.09	17.84	21.60	24.23	38.22	51.44	7.72	8.42	9.75	7.91	7.04
Other OR NonMSA Total 2014-2015	436	5.15	20.35	5.68	19.13	15.06	21.50	27.65	39.02	51.60	8.73	6.99	8.06	10.76	8.27

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF OREGON									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Salem MSA	5,493	19.27	79.53	56.18	96.83	1.22	1.95	21.36	23.27
Eastern OR NonMSA AA 2012-2013	2,585	9.07	73.15	52.50	94.51	2.71	2.79	20.76	22.83
Eastern OR NonMSA AA 2014-2015	2,319	8.13	78.68	53.21	94.87	2.16	2.98	25.28	23.57
Limited Review:									
Albany MSA 2014-2015	589	2.07	81.46	58.57	96.60	1.36	2.04	16.98	19.33
Bend-Redmond MSA	3,246	11.39	81.72	59.12	94.98	2.56	2.46	16.68	18.25
Corvallis MSA	790	2.77	80.47	57.85	97.97	0.76	1.27	16.02	16.93
Eugene MSA	4,889	17.15	79.93	57.19	97.10	0.88	2.02	17.07	19.79
Grants Pass MSA 2014-2015	443	1.55	83.29	55.76	95.26	2.03	2.71	16.71	17.21
Medford MSA	2,691	9.44	81.75	58.42	94.87	2.34	2.79	15.02	16.74
Other OR NonMSA Total 2012-2013	2,787	9.78	75.28	61.61	96.41	1.69	1.90	24.82	29.51
Other OR NonMSA Total 2014-2015	2,679	9.40	79.90	61.93	97.61	0.90	1.49	27.02	28.62

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF OREGON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Salem MSA	314	17.92	92.60	51.91	88.54	2.87	8.60	24.09	29.55
Eastern OR NonMSA AA 2012-2013	177	10.10	96.76	70.62	70.06	14.69	15.25	8.94	10.11
Eastern OR NonMSA AA 2014-2015	500	28.54	95.95	60.40	90.80	6.40	2.80	20.53	19.87
Limited Review:									
Albany MSA 2014-2015	71	4.05	96.15	54.93	100.00	0.00	0.00	28.28	26.53
Bend-Redmond MSA	74	4.22	97.83	66.22	93.24	4.05	2.70	31.75	37.21
Corvallis MSA	27	1.54	96.12	70.37	85.19	0.00	14.81	27.27	48.00
Eugene MSA	145	8.28	96.63	63.45	93.10	2.07	4.83	45.76	50.82
Grants Pass MSA 2014-2015	10	0.57	96.60	60.00	100.00	0.00	0.00	36.36	50.00
Medford MSA	122	6.96	97.10	48.36	100.00	0.00	0.00	45.71	36.92
Other OR NonMSA Total 2012-2013	93	5.31	97.54	70.97	91.40	4.30	4.30	23.36	30.89
Other OR NonMSA Total 2014-2015	219	12.50	96.48	52.05	97.26	1.83	0.91	45.69	57.80

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF OREGON Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salem MSA	30	3,790	61	8,998	91	12,788	9.18	0	0
Eastern OR NonMSA AA 2012-2013	65	58,662	45	5,137	110	63,799	45.80	0	0
Eastern OR NonMSA AA 2014-2015	32	1,136	40	2,399	72	3,535	2.54	0	0
Limited Review:									
Albany MSA 2014-2015	12	3,568	5	391	17	3,959	2.84	0	0
Bend-Redmond MSA	19	1,607	60	4,898	79	6,505	4.67	0	0
Corvallis MSA	8	733	20	1,675	28	2,408	1.73	0	0
Eugene MSA	20	2,666	104	8,458	124	11,124	7.99	1	49
Grants Pass MSA 2014-2015	5	259	4	98	9	357	0.26	0	0
Medford MSA	28	2,652	77	12,461	105	15,113	10.85	0	0
Other OR NonMSA Total 2012-2013	39	3,205	67	7,058	106	10,263	7.37	0	0
Other OR NonMSA Total 2014-2015	31	2,164	63	5,693	94	7,857	5.64	0	0
Statewide:									
Qualified Investments That Serve AAs	4	1,269	45	307	49	1,576	1.13	0	0
Qualified Investments Outside AAs	1	2	3	6	4	8	NA	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF OREGON																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Salem MSA	18.71	17	17.00	0.00	23.53	52.94	23.53	0	0	0	0	0	0	0.00	21.03	56.99	21.98
Eastern OR NonMSA AA 2012-2013	11.28	23	NA	0.00	21.74	78.26	0.00	0	0	0	0	0	0	0.75	11.22	68.74	19.29
Eastern OR NonMSA AA 2014-2015	10.09	20	20.00	0.00	15.00	85.00	0.00	0	0	0	0	0	0	1.01	9.88	76.29	12.81
Limited Review:																	
Albany MSA 2014-2015	1.19	3	3.00	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	15.69	70.41	13.90
Bend-Redmond MSA	11.49	9	9.00	0.00	33.33	55.56	11.11	0	0	0	0	0	0	0.00	15.70	64.32	19.99
Corvallis MSA	3.06	2	2.00	50.00	50.00	0.00	0.00	0	0	0	0	0	0	6.43	32.25	36.77	24.54
Eugene MSA	15.02	19	19.00	5.26	36.84	36.84	21.05	1	0	0	0	0	1	2.90	21.40	53.69	22.01
Grants Pass MSA 2014-2015	1.58	2	2.00	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	10.09	81.34	8.57
Medford MSA	10.22	10	10.00	30.00	0.00	70.00	0.00	0	0	0	0	0	0	0.88	11.86	69.85	17.41
Other OR NonMSA Total 2012-2013	9.46	21	NA	0.00	9.52	71.43	19.05	0	0	0	0	0	0	0.00	7.95	80.13	11.92
Other OR NonMSA Total 2014-2015	7.88	18	18.00	0.00	5.56	72.22	22.22	0	0	0	0	0	0	0.00	5.67	79.14	15.19

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF OREGON																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Salem MSA	18.71	17	17.00	0.00	23.53	52.94	23.53	32	20.51	0.00	37.50	46.88	15.63	0.00	21.03	56.99	21.98
Eastern OR NonMSA AA 2012-2013	11.28	23	NA	0.00	21.74	78.26	0.00	36	NA	0.00	19.44	80.56	0.00	0.75	11.22	68.74	19.29
Eastern OR NonMSA AA 2014-2015	10.09	20	20.00	0.00	15.00	85.00	0.00	27	17.31	0.00	18.52	81.48	0.00	1.01	9.88	76.29	12.81
Limited Review:																	
Albany MSA 2014-2015	1.19	3	3.00	0.00	33.33	66.67	0.00	4	2.56	0.00	25.00	75.00	0.00	0.00	15.69	70.41	13.90
Bend-Redmond MSA	11.49	9	9.00	0.00	33.33	55.56	11.11	15	9.62	0.00	33.33	60.00	6.67	0.00	15.70	64.32	19.99
Corvallis MSA	3.06	2	2.00	50.00	50.00	0.00	0.00	6	3.85	50.00	50.00	0.00	0.00	6.43	32.25	36.77	24.54
Eugene MSA	15.02	19	19.00	5.26	36.84	36.84	21.05	31	19.87	9.68	41.94	25.81	22.58	2.90	21.40	53.69	22.01
Grants Pass MSA 2014-2015	1.58	2	2.00	0.00	0.00	100.00	0.00	2	1.28	0.00	0.00	100.00	0.00	0.00	10.09	81.34	8.57
Medford MSA	10.22	10	10.00	30.00	0.00	70.00	0.00	15	9.62	33.33	13.33	53.33	0.00	0.88	11.86	69.85	17.41
Other OR NonMSA Total 2012-2013	9.46	21	NA	0.00	9.52	71.43	19.05	27	NA	0.00	11.11	70.37	18.52	0.00	7.95	80.13	11.92
Other OR NonMSA Total 2014-2015	7.88	18	18.00	0.00	5.56	72.22	22.22	24	15.38	0.00	4.17	75.00	20.83	0.00	5.67	79.14	15.19

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF SOUTH DAKOTA												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Sioux Falls MSA	55.31	3,652	513,071	3,002	121,134	398	65,935	9	16,297	7,061	716,437	43.57
Limited Review:												
Rapid City MSA	26.54	1,047	200,642	2,306	250,958	32	2,320	3	3,865	3,388	457,785	41.34
SD NonMSA Total	18.16	1,127	149,396	1,074	53,478	115	16,545	2	716	2,318	220,135	15.10
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF SOUTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Sioux Falls MSA	2,378	67.81	0.00	0.00	19.40	23.34	54.78	57.15	25.82	19.51	3.13	0.00	3.69	2.81	3.51
Limited Review:															
Rapid City MSA	490	13.97	0.19	0.41	15.87	17.96	53.78	50.20	30.16	31.43	3.55	0.00	3.61	2.85	5.11
SD NonMSA Total	639	18.22	0.00	0.00	0.00	0.00	80.55	78.72	19.45	21.28	9.77	0.00	0.00	7.34	19.13

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF SOUTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Sioux Falls MSA	123	45.22	0.00	0.00	19.40	12.20	54.78	55.28	25.82	32.52	5.20	0.00	5.48	5.06	5.37
Limited Review:															
Rapid City MSA	81	29.78	0.19	0.00	15.87	19.75	53.78	33.33	30.16	46.91	7.84	0.00	7.69	6.60	10.34
SD NonMSA Total	68	25.00	0.00	0.00	0.00	0.00	80.55	82.35	19.45	17.65	15.60	0.00	0.00	16.50	13.16

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF SOUTH DAKOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Sioux Falls MSA	1,145	56.57	0.00	0.00	19.40	13.97	54.78	53.97	25.82	32.05	5.37	0.00	5.64	5.32	5.35
Limited Review:															
Rapid City MSA	463	22.88	0.19	0.00	15.87	9.72	53.78	39.09	30.16	51.19	5.89	0.00	2.27	5.68	7.76
SD NonMSA Total	416	20.55	0.00	0.00	0.00	0.00	80.55	78.85	19.45	21.15	11.59	0.00	0.00	10.14	15.51

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF SOUTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Sioux Falls MSA	6	26.09	0.00	0.00	51.03	66.67	35.99	33.33	12.97	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Rapid City MSA	13	56.52	1.64	0.00	43.91	23.08	39.30	69.23	15.15	7.69	11.11	0.00	0.00	15.38	0.00
SD NonMSA Total	4	17.39	0.00	0.00	0.00	0.00	74.92	100.00	25.08	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF SOUTH DAKOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	% of Busi- nesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Sioux Falls MSA	3,002	47.04	0.00	0.00	35.61	39.47	42.97	40.41	21.42	20.12	14.41	0.00	15.86	13.66	12.85
Limited Review:															
Rapid City MSA	2,306	36.13	0.45	0.00	26.49	19.64	49.28	50.22	23.78	30.14	26.34	0.00	25.59	24.47	33.20
SD NonMSA Total	1,074	16.83	0.00	0.00	0.00	0.00	81.98	91.25	18.02	8.75	20.35	0.00	0.00	20.70	15.95

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF SOUTH DAKOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Sioux Falls MSA	398	73.03	0.00	0.00	7.64	1.51	70.31	89.70	22.05	8.79	22.04	0.00	38.46	24.11	8.11
Limited Review:															
Rapid City MSA	32	5.87	0.00	0.00	8.53	0.00	69.25	71.88	22.22	28.13	3.59	0.00	0.00	3.85	0.00
SD NonMSA Total	115	21.10	0.00	0.00	0.00	0.00	78.95	93.04	21.05	6.96	6.08	0.00	0.00	5.76	10.53

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF SOUTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Sioux Falls MSA	2,378	67.81	17.76	16.07	17.81	26.54	26.15	28.79	38.28	28.60	2.34	3.47	2.77	2.14	1.86
Limited Review:															
Rapid City MSA	490	13.97	18.44	3.49	18.75	13.97	22.22	19.65	40.59	62.88	2.66	1.42	2.11	2.68	3.27
SD NonMSA Total	639	18.22	14.12	1.91	16.33	21.66	24.33	23.57	45.22	52.87	5.15	3.39	2.58	3.20	8.16

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF SOUTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Sioux Falls MSA	123	45.22	17.76	12.40	17.81	25.62	26.15	33.06	38.28	28.93	5.68	12.82	4.55	6.82	4.27
Limited Review:															
Rapid City MSA	81	29.78	18.44	8.22	18.75	15.07	22.22	24.66	40.59	52.05	6.22	7.14	7.50	2.08	7.69
SD NonMSA Total	68	25.00	14.12	3.39	16.33	22.03	24.33	32.20	45.22	42.37	14.06	0.00	19.05	11.76	14.49

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF SOUTH DAKOTA															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Sioux Falls MSA	1,145	56.57	17.76	9.15	17.81	24.44	26.15	27.46	38.28	38.95	5.80	7.66	7.14	5.79	4.91
Limited Review:															
Rapid City MSA	463	22.88	18.44	5.51	18.75	14.54	22.22	18.55	40.59	61.40	6.68	3.85	4.00	5.24	9.25
SD NonMSA Total	416	20.55	14.12	3.23	16.33	19.65	24.33	25.22	45.22	51.91	7.74	9.52	10.59	7.94	6.56

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF SOUTH DAKOTA									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Sioux Falls MSA	3,002	47.04	77.10	49.03	93.00	2.33	4.66	14.41	13.94
Limited Review:									
Rapid City MSA	2,306	36.13	77.44	44.49	75.28	10.71	14.01	26.34	27.54
SD NonMSA Total	1,074	16.83	74.87	50.74	90.41	3.45	6.15	20.35	20.78

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Institution ID: USBNA

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF SOUTH DAKOTA Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Sioux Falls MSA	398	73.03	98.58	72.36	41.46	36.93	21.61	22.04	24.92
Limited Review:									
Rapid City MSA	32	5.87	98.97	90.63	75.00	18.75	6.25	3.59	2.94
SD NonMSA Total	115	21.10	98.47	63.48	53.04	24.35	22.61	6.08	7.26

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF SOUTH DAKOTA Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Sioux Falls MSA	20	2,456	21	5,372	41	7,828	27.79	0	0
Limited Review:									
Rapid City MSA	22	7,958	41	6,588	63	14,546	51.64	0	0
SD NonMSA Total	18	3,543	29	1,198	47	4,741	16.83	0	0
Statewide:									
Qualified Investments That Serve AAs	4	1,050	2	3	6	1,053	3.74	0	0
Qualified Investments Outside AAs	1	56	1	2,847	2	2,903	NA	0	0

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF SOUTH DAKOTA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Sioux Falls MSA	43.57	10	58.82	0.00	60.00	30.00	10.00	0	0	0	0	0	0	0.00	26.05	50.94	23.00
Limited Review:																	
Rapid City MSA	41.34	4	23.53	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.74	23.51	50.82	24.93
SD NonMSA Total	15.10	3	17.65	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	0.00	80.83	19.17

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF SOUTH DAKOTA																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Sioux Falls MSA	43.57	10	58.82	0.00	60.00	30.00	10.00	27	69.23	0.00	59.26	37.04	3.70	0.00	26.05	50.94	23.00
Limited Review:																	
Rapid City MSA	41.34	4	23.53	0.00	25.00	75.00	0.00	6	15.38	0.00	33.33	66.67	0.00	0.74	23.51	50.82	24.93
SD NonMSA Total	15.10	3	17.65	0.00	0.00	66.67	33.33	6	15.38	0.00	0.00	83.33	16.67	0.00	0.00	80.83	19.17

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF TENNESEE												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	39.51	8,560	1,566,579	4,662	114,609	22	514	3	7,050	13,247	1,688,752	32.78
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	30.99	4,680	853,929	5,626	100,730	78	679	6	58,235	10,390	1,013,573	33.48
Limited Review:												
Kingsport-Bristol-Bristol MSA	2.12	340	32,287	360	6,183	10	693	0	0	710	39,163	4.44
Knoxville MSA 2012-2013	6.02	843	149,561	1,169	22,481	6	47	0	0	2,018	172,089	2.39
Knoxville MSA 2014-2015	5.04	477	74,548	1,200	19,213	14	112	0	0	1,691	93,873	3.43
Morristown MSA 2012-2013	0.89	156	17,973	140	3,344	1	11	0	0	297	21,328	0.94
Morristown MSA 2014-2015	0.94	138	14,252	173	4,102	3	19	0	0	314	18,373	0.94
TN NonMSA Total 2012-2013	8.84	1,871	204,260	1,055	24,179	38	951	0	0	2,964	229,390	11.67
TN NonMSA Total 2014-2015	5.66	810	84,711	1,033	21,732	53	1,402	0	0	1,896	107,845	9.93
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	4	9,964	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF TENNESEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	3,002	44.45	3.50	3.20	16.16	11.13	45.33	44.07	35.01	41.61	3.89	5.02	3.39	4.11	3.74
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	2,524	37.38	3.48	3.01	14.56	11.17	46.83	44.33	35.12	41.48	2.94	2.36	2.64	2.98	3.02
Limited Review:															
Kingsport-Bristol-Bristol MSA	70	1.04	0.00	0.00	32.88	22.86	58.44	74.29	8.68	2.86	0.95	0.00	1.50	0.82	0.00
Knoxville MSA 2012-2013	214	3.17	2.46	0.47	14.76	7.94	53.10	57.01	29.68	34.58	1.13	0.00	0.84	1.33	0.99
Knoxville MSA 2014-2015	170	2.52	2.22	2.35	12.31	9.41	53.87	52.94	31.61	35.29	0.81	1.28	0.92	0.82	0.74
Morristown MSA 2012-2013	11	0.16	0.00	0.00	8.70	0.00	76.06	100.00	15.23	0.00	0.41	0.00	0.00	0.52	0.00
Morristown MSA 2014-2015	32	0.47	0.00	0.00	8.70	3.13	81.07	81.25	10.23	15.63	0.75	0.00	0.00	0.70	1.40
TN NonMSA Total 2012-2013	463	6.86	0.42	0.65	10.00	5.62	60.57	53.78	29.01	39.96	2.62	7.69	2.92	2.47	2.75
TN NonMSA Total 2014-2015	267	3.95	0.54	0.75	9.15	10.86	59.11	58.05	31.20	30.34	2.02	3.13	3.55	2.04	1.66

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF TENNESEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	294	28.97	3.50	2.04	16.16	13.95	45.33	47.96	35.01	36.05	8.90	4.65	8.62	8.50	10.16
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	271	26.70	3.48	4.43	14.56	12.92	46.83	52.03	35.12	30.63	5.05	5.41	5.61	5.38	4.31
Limited Review:															
Kingsport-Bristol-Bristol MSA	21	2.07	0.00	0.00	32.88	19.05	58.44	80.95	8.68	0.00	5.05	0.00	2.94	6.67	0.00
Knoxville MSA 2012-2013	31	3.05	2.46	0.00	14.76	16.13	53.10	64.52	29.68	19.35	2.67	0.00	4.00	3.10	1.61
Knoxville MSA 2014-2015	39	3.84	2.22	0.00	12.31	20.51	53.87	56.41	31.61	23.08	2.03	0.00	1.63	2.41	1.68
Morristown MSA 2012-2013	21	2.07	0.00	0.00	8.70	4.76	76.06	85.71	15.23	9.52	9.15	0.00	0.00	10.08	8.00
Morristown MSA 2014-2015	22	2.17	0.00	0.00	8.70	9.09	81.07	81.82	10.23	9.09	6.29	0.00	5.88	5.51	13.33
TN NonMSA Total 2012-2013	180	17.73	0.42	0.00	10.00	7.22	60.57	68.33	29.01	24.44	11.49	0.00	11.48	12.33	9.64
TN NonMSA Total 2014-2015	136	13.40	0.54	1.47	9.15	11.76	59.11	64.71	31.20	22.06	12.11	50.00	14.29	13.40	8.53

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF TENNESEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	5,262	52.17	3.50	1.71	16.16	10.03	45.33	42.53	35.01	45.72	4.94	3.90	4.48	5.18	4.91
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	1,879	18.63	3.48	2.45	14.56	11.60	46.83	48.54	35.12	37.41	4.24	3.92	4.23	4.71	3.79
Limited Review:															
Kingsport-Bristol-Bristol MSA	247	2.45	0.00	0.00	32.88	27.94	58.44	70.85	8.68	1.21	12.07	0.00	12.16	13.83	4.76
Knoxville MSA 2012-2013	595	5.90	2.46	1.01	14.76	14.12	53.10	48.40	29.68	36.47	2.35	2.81	3.21	2.37	2.04
Knoxville MSA 2014-2015	267	2.65	2.22	1.87	12.31	10.49	53.87	56.55	31.61	31.09	2.06	3.96	2.55	2.34	1.54
Morristown MSA 2012-2013	122	1.21	0.00	0.00	8.70	3.28	76.06	88.52	15.23	8.20	3.72	0.00	2.68	4.25	1.92
Morristown MSA 2014-2015	84	0.83	0.00	0.00	8.70	2.38	81.07	92.86	10.23	4.76	4.16	0.00	2.70	4.62	1.65
TN NonMSA Total 2012-2013	1,226	12.16	0.42	0.16	10.00	8.73	60.57	62.23	29.01	28.87	5.12	0.00	6.93	5.29	4.52
TN NonMSA Total 2014-2015	404	4.01	0.54	0.74	9.15	9.16	59.11	61.63	31.20	28.47	5.33	4.55	6.99	5.83	4.24

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF TENNESEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	2	11.11	17.31	0.00	31.17	100.00	30.64	0.00	20.88	0.00	0.00	0.00	0.00	0.00	0.00
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	4	22.22	16.38	0.00	29.97	100.00	32.66	0.00	20.98	0.00	0.77	0.00	1.79	0.00	0.00
Limited Review:															
Kingsport-Bristol-Bristol MSA	2	11.11	0.00	0.00	31.31	50.00	63.34	50.00	5.35	0.00	20.00	0.00	0.00	33.33	0.00
Knoxville MSA 2012-2013	3	16.67	22.30	66.67	28.40	33.33	35.41	0.00	13.89	0.00	3.64	10.00	0.00	0.00	0.00
Knoxville MSA 2014-2015	1	5.56	21.36	100.00	21.46	0.00	39.78	0.00	17.40	0.00	1.18	7.14	0.00	0.00	0.00
Morristown MSA 2012-2013	2	11.11	0.00	0.00	29.24	0.00	62.70	100.00	8.05	0.00	0.00	0.00	0.00	0.00	0.00
Morristown MSA 2014-2015	0	0.00	0.00	0.00	29.24	0.00	63.91	0.00	6.85	0.00	0.00	0.00	0.00	0.00	0.00
TN NonMSA Total 2012-2013	2	11.11	2.44	0.00	24.40	0.00	52.17	50.00	20.99	50.00	2.56	0.00	0.00	0.00	11.11
TN NonMSA Total 2014-2015	2	11.11	3.10	0.00	20.01	0.00	52.78	50.00	24.11	50.00	4.35	0.00	0.00	7.69	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF TENNESEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	4,662	30.27	8.07	8.18	19.13	18.79	35.02	32.77	37.05	40.26	10.46	10.28	10.91	11.31	9.87
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	5,609	36.42	7.38	6.19	18.51	18.01	35.70	36.41	37.54	39.40	10.34	9.20	10.86	11.80	9.36
Limited Review:															
Kingsport-Bristol-Bristol MSA	360	2.34	0.00	0.00	25.89	23.33	64.71	74.72	9.40	1.94	26.39	0.00	25.77	28.74	8.70
Knoxville MSA 2012-2013	1,169	7.59	5.22	6.24	21.06	25.66	40.17	38.67	32.91	29.43	9.28	10.00	11.05	8.81	6.92
Knoxville MSA 2014-2015	1,199	7.79	4.75	3.84	16.66	19.52	43.33	48.37	34.64	28.27	7.40	6.10	8.49	8.65	5.11
Morristown MSA 2012-2013	140	0.91	0.00	0.00	14.62	2.14	73.67	87.14	11.71	10.71	9.04	0.00	1.55	11.01	4.63
Morristown MSA 2014-2015	173	1.12	0.00	0.00	15.72	12.72	75.91	84.39	8.37	2.89	9.34	0.00	7.74	10.17	2.73
TN NonMSA Total 2012-2013	1,055	6.85	0.77	0.76	15.77	16.40	56.82	58.01	26.55	24.83	11.42	9.09	11.62	11.66	11.01
TN NonMSA Total 2014-2015	1,033	6.71	1.10	1.26	17.11	18.59	52.83	55.86	28.84	24.30	12.17	19.23	14.17	12.02	11.25

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF TENNESEE															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	22	9.78	2.60	4.55	14.68	9.09	52.82	72.73	29.67	13.64	4.88	0.00	6.06	5.65	2.17
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	78	34.67	2.50	1.28	13.51	6.41	54.37	51.28	29.39	41.03	15.27	0.00	8.70	14.86	20.90
Limited Review:															
Kingsport-Bristol-Bristol MSA	10	4.44	0.00	0.00	29.19	40.00	67.08	60.00	3.73	0.00	23.53	0.00	16.67	27.27	0.00
Knoxville MSA 2012-2013	6	2.67	1.97	0.00	14.77	16.67	54.74	50.00	27.96	33.33	9.38	0.00	16.67	11.11	0.00
Knoxville MSA 2014-2015	14	6.22	1.63	0.00	11.66	28.57	56.52	57.14	29.59	14.29	16.13	0.00	25.00	19.05	0.00
Morristown MSA 2012-2013	1	0.44	0.00	0.00	6.54	100.00	81.20	0.00	12.26	0.00	4.35	0.00	100.00	0.00	0.00
Morristown MSA 2014-2015	3	1.33	0.00	0.00	7.07	66.67	86.20	33.33	6.73	0.00	5.26	0.00	0.00	0.00	0.00
TN NonMSA Total 2012-2013	38	16.89	0.32	0.00	8.14	7.89	64.51	65.79	26.95	26.32	11.28	0.00	22.22	9.70	14.00
TN NonMSA Total 2014-2015	53	23.56	0.36	0.00	5.72	1.89	65.02	64.15	28.86	33.96	15.15	0.00	0.00	16.19	15.38

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF TENNESSEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	3,002	44.44	20.17	29.85	17.57	24.00	21.15	15.32	41.11	30.83	1.67	5.24	1.85	1.00	1.21
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	2,526	37.39	20.00	28.68	17.57	28.49	21.31	16.91	41.12	25.92	1.49	5.64	1.95	0.98	0.80
Limited Review:															
Kingsport-Bristol-Bristol MSA	70	1.04	25.05	15.38	19.49	21.54	21.37	23.08	34.08	40.00	1.15	1.85	0.67	2.17	0.56
Knoxville MSA 2012-2013	214	3.17	19.86	11.27	17.34	23.94	21.37	21.83	41.43	42.96	0.94	0.44	1.19	0.93	0.92
Knoxville MSA 2014-2015	170	2.52	18.93	15.38	16.44	20.51	20.81	13.68	43.82	50.43	0.76	1.39	0.73	0.35	0.88
Morristown MSA 2012-2013	11	0.16	19.79	12.50	17.56	0.00	20.13	25.00	42.52	62.50	0.28	1.23	0.00	0.69	0.00
Morristown MSA 2014-2015	32	0.47	20.96	4.00	18.08	20.00	20.75	28.00	40.21	48.00	0.65	0.00	1.16	0.00	0.82
TN NonMSA Total 2012-2013	463	6.85	18.71	10.43	16.64	25.54	20.73	23.38	43.92	40.65	1.69	3.46	1.75	1.56	1.49
TN NonMSA Total 2014-2015	267	3.95	19.26	7.18	17.03	27.07	20.98	31.49	42.73	34.25	1.56	1.56	1.96	1.74	1.28

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF TENNESSEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	294	28.97	20.17	14.56	17.57	27.20	21.15	24.90	41.11	33.33	7.82	8.82	10.46	9.23	5.78
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	271	26.70	20.00	9.96	17.57	23.65	21.31	29.46	41.12	36.93	4.84	3.42	6.54	4.87	4.45
Limited Review:															
Kingsport-Bristol-Bristol MSA	21	2.07	25.05	19.05	19.49	28.57	21.37	23.81	34.08	28.57	5.21	0.00	10.71	4.17	3.03
Knoxville MSA 2012-2013	31	3.05	19.86	10.34	17.34	37.93	21.37	20.69	41.43	31.03	2.52	2.63	4.19	2.55	1.54
Knoxville MSA 2014-2015	39	3.84	18.93	22.86	16.44	5.71	20.81	31.43	43.82	40.00	1.95	3.88	1.23	3.24	1.03
Morristown MSA 2012-2013	21	2.07	19.79	9.52	17.56	33.33	20.13	33.33	42.52	23.81	9.40	12.50	12.50	12.82	5.71
Morristown MSA 2014-2015	22	2.17	20.96	0.00	18.08	36.36	20.75	18.18	40.21	45.45	6.94	0.00	13.64	9.38	1.85
TN NonMSA Total 2012-2013	180	17.73	18.71	11.36	16.64	23.86	20.73	20.45	43.92	44.32	12.05	15.63	16.35	10.47	10.22
TN NonMSA Total 2014-2015	136	13.40	19.26	12.12	17.03	25.76	20.98	23.48	42.73	38.64	13.28	9.09	19.30	15.04	10.79

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF TENNESSEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	5,262	52.17	20.17	9.93	17.57	21.39	21.15	25.62	41.11	43.07	4.08	5.42	4.67	4.42	3.52
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	1,879	18.63	20.00	9.00	17.57	24.08	21.31	27.92	41.12	39.00	4.02	4.88	5.11	4.57	3.21
Limited Review:															
Kingsport-Bristol-Bristol MSA	247	2.45	25.05	11.11	19.49	26.92	21.37	26.07	34.08	35.90	13.14	15.79	22.54	9.09	10.91
Knoxville MSA 2012-2013	595	5.90	19.86	10.08	17.34	22.55	21.37	18.30	41.43	49.07	2.12	2.55	3.46	1.47	1.88
Knoxville MSA 2014-2015	267	2.65	18.93	11.35	16.44	25.33	20.81	25.76	43.82	37.55	2.26	1.67	3.36	2.84	1.65
Morristown MSA 2012-2013	122	1.21	19.79	10.53	17.56	26.32	20.13	18.42	42.52	44.74	4.22	4.81	6.96	1.97	4.36
Morristown MSA 2014-2015	84	0.83	20.96	7.69	18.08	35.90	20.75	25.64	40.21	30.77	5.16	7.59	8.07	6.90	2.43
TN NonMSA Total 2012-2013	1,226	12.15	18.71	5.63	16.64	18.54	20.73	28.54	43.92	47.28	5.53	4.21	6.21	6.77	4.97
TN NonMSA Total 2014-2015	405	4.02	19.26	6.45	17.03	17.60	20.98	29.03	42.73	46.92	5.76	4.79	5.44	8.11	4.97

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF TENNESEE									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	4,662	30.24	71.51	62.87	95.97	1.82	2.21	10.46	14.01
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	5,626	36.49	76.29	63.26	97.55	1.07	1.39	10.34	12.67
Limited Review:									
Kingsport-Bristol-Bristol MSA	360	2.33	78.55	68.61	95.83	3.89	0.28	26.39	30.59
Knoxville MSA 2012-2013	1,169	7.58	71.93	42.77	96.49	2.40	1.11	9.28	8.60
Knoxville MSA 2014-2015	1,200	7.78	75.98	61.08	97.92	0.92	1.17	7.40	9.02
Morristown MSA 2012-2013	140	0.91	72.65	58.57	95.00	2.86	2.14	9.04	12.05
Morristown MSA 2014-2015	173	1.12	76.44	58.38	95.95	1.16	2.89	9.34	10.67
TN NonMSA Total 2012-2013	1,055	6.84	73.80	64.83	95.73	3.03	1.23	11.42	16.59
TN NonMSA Total 2014-2015	1,033	6.70	77.51	61.37	96.71	2.13	1.16	12.17	15.63

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF TENNESEE Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	22	9.78	97.77	86.36	95.45	4.55	0.00	4.88	7.96
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	78	34.67	96.57	69.23	100.00	0.00	0.00	15.27	22.31
Limited Review:									
Kingsport-Bristol-Bristol MSA	10	4.44	97.52	90.00	70.00	30.00	0.00	23.53	25.00
Knoxville MSA 2012-2013	6	2.67	97.71	100.00	100.00	0.00	0.00	9.38	23.08
Knoxville MSA 2014-2015	14	6.22	96.57	57.14	100.00	0.00	0.00	16.13	20.00
Morristown MSA 2012-2013	1	0.44	98.37	100.00	100.00	0.00	0.00	4.35	20.00
Morristown MSA 2014-2015	3	1.33	96.97	100.00	100.00	0.00	0.00	5.26	8.33
TN NonMSA Total 2012-2013	38	16.89	98.46	89.47	97.37	2.63	0.00	11.28	23.86
TN NonMSA Total 2014-2015	53	23.56	98.21	79.25	94.34	3.77	1.89	15.15	27.78

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

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Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF TENNESSEE Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Nashville-Davidson--Murfreeseboro--Franklin MSA 2012-2013	63	34,074	69	15,400	132	49,474	37.89	2	659
Nashville-Davidson--Murfreeseboro--Franklin MSA 2014-2015	67	17,728	56	19,300	123	37,028	28.36	0	0
Limited Review:									
Kingsport-Bristol-Bristol MSA	11	1,414	21	38	32	1,452	1.11	0	0
Knoxville MSA 2012-2013	5	1,502	23	1,015	28	2,517	1.93	1	346
Knoxville MSA 2014-2015	5	297	31	16,082	36	16,379	12.54	0	0
Morristown MSA 2012-2013	7	710	5	8	12	718	0.55	0	0
Morristown MSA 2014-2015	7	710	3	6	10	716	0.55	0	0
TN NonMSA Total 2012-2013	34	6,077	36	3,641	70	9,718	7.44	0	0
TN NonMSA Total 2014-2015	24	4,252	27	8,307	51	12,559	9.62	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	6	8	6	8	0.01	0	0
Qualified Investments Outside AAs	3	5,356	28	32,094	31	37,450	NA	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF TENNESEE																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	32.78	51	NA	5.88	13.73	35.29	43.14	1	2	0	0	0	-1	7.47	20.06	41.45	30.70
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	33.48	55	57.89	3.64	12.73	38.18	43.64	2	0	0	0	1	1	7.20	18.61	43.04	30.84
Limited Review:																	
Kingsport-Bristol-Bristol MSA	4.44	3	3.16	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	32.30	60.29	7.41
Knoxville MSA 2012-2013	2.39	16	NA	0.00	37.50	50.00	12.50	8	0	0	3	4	1	6.10	17.33	48.88	26.61
Knoxville MSA 2014-2015	3.43	18	18.95	0.00	16.67	66.67	16.67	0	0	0	0	0	0	5.55	13.92	50.73	28.81
Morristown MSA 2012-2013	0.94	3	NA	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.00	0.00	89.55	10.45
Morristown MSA 2014-2015	0.94	4	4.21	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.00	11.44	78.62	9.94
TN NonMSA Total 2012-2013	11.67	19	NA	0.00	15.79	47.37	36.84	1	0	0	0	0	1	0.65	13.22	59.20	26.93
TN NonMSA Total 2014-2015	9.93	15	15.79	0.00	20.00	40.00	40.00	0	0	0	0	0	0	0.83	12.47	57.15	29.54

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF TENNESEE																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nashville-Davidson--Murfreesboro--Franklin MSA 2012-2013	32.78	51	NA	5.88	13.73	35.29	43.14	59	NA	6.78	15.25	33.90	42.37	7.47	20.06	41.45	30.70
Nashville-Davidson--Murfreesboro--Franklin MSA 2014-2015	33.48	55	57.89	3.64	12.73	38.18	43.64	59	56.73	3.39	13.56	37.29	44.07	7.20	18.61	43.04	30.84
Limited Review:																	
Kingsport-Bristol-Bristol MSA	4.44	3	3.16	0.00	0.00	100.00	0.00	3	2.88	0.00	0.00	66.67	33.33	0.00	32.30	60.29	7.41
Knoxville MSA 2012-2013	2.39	16	NA	0.00	37.50	50.00	12.50	18	NA	0.00	33.33	55.56	11.11	6.10	17.33	48.88	26.61
Knoxville MSA 2014-2015	3.43	18	18.95	0.00	16.67	66.67	16.67	20	19.23	0.00	15.00	70.00	15.00	5.55	13.92	50.73	28.81
Morristown MSA 2012-2013	0.94	3	NA	0.00	0.00	100.00	0.00	3	NA	0.00	0.00	100.00	0.00	0.00	0.00	89.55	10.45
Morristown MSA 2014-2015	0.94	4	4.21	0.00	0.00	100.00	0.00	4	3.85	0.00	0.00	100.00	0.00	0.00	11.44	78.62	9.94
TN NonMSA Total 2012-2013	11.67	19	NA	0.00	15.79	47.37	36.84	21	NA	0.00	19.05	42.86	38.10	0.65	13.22	59.20	26.93
TN NonMSA Total 2014-2015	9.93	15	15.79	0.00	20.00	40.00	40.00	18	17.31	0.00	22.22	44.44	33.33	0.83	12.47	57.15	29.54

Institution ID: USBNA

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF UTAH												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Salt Lake City MSA 2012-2013	28.78	5,782	1,455,679	3,455	148,548	3	97	2	32,400	9,242	1,636,724	41.68
Salt Lake City MSA 2014-2015	19.94	2,713	668,430	3,661	124,480	11	195	18	71,202	6,403	864,307	39.14
Limited Review:												
Ogden-Clearfield MSA 2012-2013	11.43	2,663	551,998	1,007	42,263	0	0	0	0	3,670	594,261	3.72
Ogden-Clearfield MSA 2014-2015	8.88	1,632	339,524	1,208	41,867	4	147	7	67	2,851	381,605	3.82
Provo-Orem MSA	19.51	4,171	968,358	2,079	62,305	8	169	5	7,536	6,263	1,038,368	4.29
St. George MSA	6.48	1,309	279,559	765	21,709	2	27	3	33	2,079	301,328	4.17
UT NonMSA Total 2012-2013	2.83	734	150,006	173	3,444	1	3	0	0	908	153,453	0.37
UT NonMSA Total 2014-2015	2.16	342	182,771	349	12,608	1	5	0	0	692	195,384	2.81
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	6	58	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.

*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF UTAH Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Salt Lake City MSA 2012-2013	1,672	22.85	2.41	1.73	13.61	7.83	51.26	44.80	32.72	45.63	2.99	2.81	1.46	2.69	4.11
Salt Lake City MSA 2014-2015	1,595	21.80	2.07	3.45	13.75	13.86	52.53	53.42	31.64	29.28	4.38	5.30	4.91	4.38	4.03
Limited Review:															
Ogden-Clearfield MSA 2012-2013	694	9.48	1.11	0.72	18.16	12.82	54.88	54.18	25.85	32.28	2.34	1.55	1.55	2.12	3.56
Ogden-Clearfield MSA 2014-2015	909	12.42	0.71	0.55	14.83	16.06	56.27	59.52	28.18	23.87	3.93	2.42	4.32	4.03	3.50
Provo-Orem MSA	1,587	21.69	1.18	0.76	11.99	10.08	56.52	59.04	30.31	30.12	3.08	0.97	3.48	2.91	3.51
St. George MSA	527	7.20	0.00	0.00	1.77	2.47	83.62	80.65	14.60	16.89	2.54	0.00	4.60	2.31	3.95
UT NonMSA Total 2012-2013	158	2.16	0.00	0.00	9.07	8.23	73.95	72.15	16.98	19.62	2.52	0.00	1.71	2.49	3.04
UT NonMSA Total 2014-2015	175	2.39	0.00	0.00	10.00	4.00	47.73	38.86	42.27	57.14	2.63	0.00	1.02	2.17	3.65

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT															
Geography: STATE OF UTAH															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Salt Lake City MSA 2012-2013	110	27.36	2.41	0.00	13.61	13.64	51.26	45.45	32.72	40.91	4.89	0.00	6.90	5.10	4.23
Salt Lake City MSA 2014-2015	102	25.37	2.07	0.98	13.75	15.69	52.53	35.29	31.64	48.04	2.23	2.44	3.68	1.45	2.95
Limited Review:															
Ogden-Clearfield MSA 2012-2013	38	9.45	1.11	5.26	18.16	15.79	54.88	39.47	25.85	39.47	3.44	28.57	2.44	2.29	5.07
Ogden-Clearfield MSA 2014-2015	52	12.94	0.71	0.00	14.83	17.31	56.27	59.62	28.18	23.08	2.00	0.00	2.67	2.40	1.15
Provo-Orem MSA	52	12.94	1.18	1.92	11.99	7.69	56.52	50.00	30.31	40.38	1.46	0.00	2.63	1.28	1.62
St. George MSA	26	6.47	0.00	0.00	1.77	0.00	83.62	80.77	14.60	19.23	3.56	0.00	0.00	3.29	5.41
UT NonMSA Total 2012-2013	7	1.74	0.00	0.00	9.07	0.00	73.95	71.43	16.98	28.57	3.42	0.00	0.00	3.53	4.55
UT NonMSA Total 2014-2015	15	3.73	0.00	0.00	10.00	0.00	47.73	46.67	42.27	53.33	4.98	0.00	0.00	5.56	5.19

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF UTAH															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Salt Lake City MSA 2012-2013	3,998	34.43	2.41	1.85	13.61	9.58	51.26	46.32	32.72	42.25	4.77	4.98	4.27	4.46	5.37
Salt Lake City MSA 2014-2015	1,011	8.71	2.07	1.98	13.75	10.19	52.53	52.62	31.64	35.21	2.87	2.72	2.72	2.81	3.02
Limited Review:															
Ogden-Clearfield MSA 2012-2013	1928	16.60	1.11	0.52	18.16	10.84	54.88	56.12	25.85	32.52	4.25	5.26	2.69	4.42	4.74
Ogden-Clearfield MSA 2014-2015	669	5.76	0.71	0.30	14.83	9.57	56.27	57.10	28.18	33.03	3.55	3.70	2.78	3.65	3.65
Provo-Orem MSA	2,530	21.79	1.18	0.91	11.99	8.42	56.52	57.27	30.31	33.40	2.86	1.64	2.06	2.50	3.84
St. George MSA	756	6.51	0.00	0.00	1.77	1.98	83.62	78.84	14.60	19.18	3.57	0.00	1.59	3.39	4.63
UT NonMSA Total 2012-2013	569	4.90	0.00	0.00	9.07	4.22	73.95	72.58	16.98	23.20	8.78	0.00	4.46	9.06	9.59
UT NonMSA Total 2014-2015	152	1.31	0.00	0.00	10.00	1.32	47.73	39.47	42.27	59.21	3.32	0.00	0.60	3.14	3.83

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF UTAH Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Salt Lake City MSA 2012-2013	1	7.69	14.47	0.00	34.56	0.00	40.57	100.00	10.39	0.00	1.18	0.00	0.00	3.45	0.00
Salt Lake City MSA 2014-2015	5	38.46	14.28	20.00	37.36	40.00	40.29	40.00	8.07	0.00	4.44	8.33	2.86	6.25	0.00
Limited Review:															
Ogden-Clearfield MSA 2012-2013	3	23.08	6.50	33.33	53.09	66.67	32.06	0.00	8.34	0.00	5.71	16.67	7.14	0.00	0.00
Ogden-Clearfield MSA 2014-2015	2	15.38	5.59	50.00	47.47	0.00	37.03	50.00	9.90	0.00	2.70	50.00	0.00	0.00	0.00
Provo-Orem MSA	2	15.38	34.18	100.00	32.66	0.00	28.91	0.00	4.25	0.00	0.00	0.00	0.00	0.00	0.00
St. George MSA	0	0.00	0.00	0.00	3.16	0.00	91.83	0.00	5.01	0.00	0.00	0.00	0.00	0.00	0.00
UT NonMSA Total 2012-2013	0	0.00	0.00	0.00	30.99	0.00	61.13	0.00	7.88	0.00	0.00	0.00	0.00	0.00	0.00
UT NonMSA Total 2014-2015	0	0.00	0.00	0.00	13.76	0.00	58.48	0.00	27.76	0.00	0.00	0.00	0.00	0.00	0.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF UTAH															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake City MSA 2012-2013	3,455	27.22	4.40	4.69	17.66	21.76	42.64	42.07	34.86	31.47	7.35	6.94	8.42	7.60	6.77
Salt Lake City MSA 2014-2015	3,657	28.81	4.75	4.98	19.03	21.58	43.44	42.60	32.25	30.84	7.00	6.11	7.32	7.21	6.71
Limited Review:															
Ogden-Clearfield MSA 2012-2013	1,007	7.93	3.26	5.06	20.36	19.07	47.05	51.84	29.33	24.03	6.54	6.05	7.20	7.33	4.92
Ogden-Clearfield MSA 2014-2015	1,208	9.52	3.12	4.22	16.96	14.32	48.17	54.64	31.75	26.82	6.16	5.43	6.34	6.82	5.18
Provo-Orem MSA	2,079	16.38	2.91	5.10	15.34	16.40	49.72	49.30	32.04	29.20	5.33	10.29	5.66	4.89	5.20
St. George MSA	765	6.03	0.00	0.00	5.38	4.44	81.81	83.66	12.82	11.90	4.72	0.00	3.77	4.73	4.64
UT NonMSA Total 2012-2013	173	1.36	0.00	0.00	16.20	16.18	65.80	54.34	18.00	29.48	5.15	0.00	8.40	4.10	7.01
UT NonMSA Total 2014-2015	349	2.75	0.00	0.00	11.02	8.60	43.47	40.69	45.51	50.72	4.35	0.00	5.54	4.13	4.48

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF UTAH															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Salt Lake City MSA 2012-2013	3	10.00	3.09	0.00	13.01	0.00	45.84	66.67	37.95	33.33	6.56	0.00	0.00	6.06	0.00
Salt Lake City MSA 2014-2015	11	36.67	3.46	0.00	16.25	18.18	44.95	36.36	35.20	45.45	13.89	100.00	16.67	0.00	17.65
Limited Review:															
Ogden-Clearfield MSA 2012-2013	0	0.00	2.84	0.00	14.63	0.00	54.08	0.00	28.46	0.00	0.00	0.00	0.00	0.00	0.00
Ogden-Clearfield MSA 2014-2015	4	13.33	1.66	0.00	9.21	0.00	63.17	100.00	25.96	0.00	0.83	0.00	0.00	1.06	0.00
Provo-Orem MSA	8	26.67	1.10	0.00	9.06	0.00	64.86	100.00	24.97	0.00	2.94	0.00	0.00	3.70	0.00
St. George MSA	2	6.67	0.00	0.00	1.63	0.00	77.78	100.00	20.60	0.00	0.00	0.00	0.00	0.00	0.00
UT NonMSA Total 2012-2013	1	3.33	0.00	0.00	4.98	0.00	83.56	100.00	11.46	0.00	0.00	0.00	0.00	0.00	0.00
UT NonMSA Total 2014-2015	1	3.33	0.00	0.00	7.26	0.00	49.88	0.00	42.86	100.00	3.45	0.00	0.00	0.00	7.14

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF UTAH Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Salt Lake City MSA 2012-2013	1,672	22.85	18.61	4.09	18.67	12.87	22.58	15.20	40.13	67.84	1.36	0.30	0.51	0.89	2.69
Salt Lake City MSA 2014-2015	1,595	21.80	18.33	2.28	18.66	14.53	22.81	16.81	40.20	66.38	0.88	0.29	0.45	0.44	1.84
Limited Review:															
Ogden-Clearfield MSA 2012-2013	694	9.48	16.38	6.21	19.85	21.12	24.82	27.33	38.96	45.34	0.87	0.21	0.55	0.85	1.57
Ogden-Clearfield MSA 2014-2015	909	12.42	16.19	10.19	19.62	12.74	24.98	24.20	39.20	52.87	0.70	0.40	0.36	0.55	1.47
Provo-Orem MSA	1,587	21.69	18.26	5.48	19.05	16.89	23.60	15.13	39.10	62.50	1.02	0.40	0.46	0.41	2.19
St. George MSA	527	7.20	15.59	4.88	19.30	13.82	26.03	16.26	39.08	65.04	0.86	0.65	0.59	0.65	1.11
UT NonMSA Total 2012-2013	158	2.16	17.44	4.76	17.85	7.14	24.48	14.29	40.22	73.81	1.03	0.63	0.52	0.65	1.69
UT NonMSA Total 2014-2015	175	2.39	18.42	1.52	15.02	1.52	20.37	4.55	46.19	92.42	2.40	0.69	0.43	0.54	3.62

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF UTAH Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Salt Lake City MSA 2012-2013	111	27.54	18.61	13.33	18.67	16.67	22.58	37.78	40.13	32.22	3.63	5.88	3.86	4.22	2.71
Salt Lake City MSA 2014-2015	102	25.31	18.33	4.49	18.66	29.21	22.81	24.72	40.20	41.57	2.21	2.07	3.48	1.38	2.29
Limited Review:															
Ogden-Clearfield MSA 2012-2013	38	9.43	16.38	17.86	19.85	14.29	24.82	32.14	38.96	35.71	2.47	5.41	1.75	2.55	2.12
Ogden-Clearfield MSA 2014-2015	52	12.90	16.19	14.89	19.62	27.66	24.98	10.64	39.20	46.81	1.82	4.76	2.54	0.49	2.08
Provo-Orem MSA	52	12.90	18.26	4.88	19.05	7.32	23.60	24.39	39.10	63.41	1.03	1.67	0.00	0.89	1.29
St. George MSA	26	6.45	15.59	5.26	19.30	21.05	26.03	15.79	39.08	57.89	2.06	0.00	2.78	0.00	2.94
UT NonMSA Total 2012-2013	7	1.74	17.44	0.00	17.85	0.00	24.48	33.33	40.22	66.67	2.65	0.00	0.00	2.86	3.70
UT NonMSA Total 2014-2015	15	3.72	18.42	7.14	15.02	0.00	20.37	7.14	46.19	85.71	4.69	20.00	0.00	0.00	6.96

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF UTAH															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Salt Lake City MSA 2012-2013	3,998	34.43	18.61	8.89	18.67	20.54	22.58	24.52	40.13	46.05	3.88	4.76	4.12	3.43	3.87
Salt Lake City MSA 2014-2015	1,011	8.71	18.33	9.28	18.66	19.13	22.81	24.75	40.20	46.84	2.65	2.59	2.44	2.41	2.95
Limited Review:															
Ogden-Clearfield MSA 2012-2013	1928	16.60	16.38	8.23	19.85	20.37	24.82	30.14	38.96	41.26	3.26	4.53	2.70	3.08	3.46
Ogden-Clearfield MSA 2014-2015	669	5.76	16.19	5.53	19.62	23.68	24.98	26.05	39.20	44.74	2.89	1.96	3.30	2.47	3.20
Provo-Orem MSA	2,530	21.79	18.26	4.48	19.05	15.42	23.60	27.65	39.10	52.45	1.97	1.57	1.51	1.68	2.38
St. George MSA	756	6.51	15.59	5.97	19.30	16.72	26.03	21.79	39.08	55.52	2.20	3.85	1.60	1.31	2.65
UT NonMSA Total 2012-2013	569	4.90	17.44	8.04	17.85	13.83	24.48	26.37	40.22	51.77	6.61	8.61	4.72	6.79	6.92
UT NonMSA Total 2014-2015	152	1.31	18.42	5.47	15.02	6.25	20.37	13.28	46.19	75.00	3.42	6.76	1.12	2.89	3.80

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF UTAH									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Salt Lake City MSA 2012-2013	3,455	27.21	70.87	54.01	92.59	2.32	5.09	7.35	9.21
Salt Lake City MSA 2014-2015	3,661	28.83	77.48	56.51	94.32	1.91	3.77	7.00	8.67
Limited Review:									
Ogden-Clearfield MSA 2012-2013	1,007	7.93	73.12	62.07	92.15	3.08	4.77	6.54	8.88
Ogden-Clearfield MSA 2014-2015	1,208	9.51	80.48	60.76	93.87	2.90	3.23	6.16	7.90
Provo-Orem MSA	2,079	16.37	81.40	57.72	95.14	2.12	2.74	5.33	6.14
St. George MSA	765	6.03	79.74	55.16	95.82	2.09	2.09	4.72	5.37
UT NonMSA Total 2012-2013	173	1.36	74.24	66.47	97.11	0.58	2.31	5.15	6.70
UT NonMSA Total 2014-2015	349	2.75	80.25	58.74	94.27	1.72	4.01	4.35	4.75

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF UTAH Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Salt Lake City MSA 2012-2013	3	10.00	96.48	100.00	100.00	0.00	0.00	6.56	9.30
Salt Lake City MSA 2014-2015	11	36.67	95.57	63.64	100.00	0.00	0.00	13.89	23.53
Limited Review:									
Ogden-Clearfield MSA 2012-2013	0	0.00	97.87	0.00	0.00	0.00	0.00	0.00	0.00
Ogden-Clearfield MSA 2014-2015	4	13.33	97.58	75.00	100.00	0.00	0.00	0.83	1.27
Provo-Orem MSA	8	26.67	96.35	62.50	100.00	0.00	0.00	2.94	4.88
St. George MSA	2	6.67	98.64	100.00	100.00	0.00	0.00	0.00	0.00
UT NonMSA Total 2012-2013	1	3.33	98.34	0.00	100.00	0.00	0.00	0.00	0.00
UT NonMSA Total 2014-2015	1	3.33	98.79	100.00	100.00	0.00	0.00	3.45	3.03

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF UTAH Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Salt Lake City MSA 2012-2013	25	12,417	69	10,637	94	23,054	35.12	3	364
Salt Lake City MSA 2014-2015	17	5,457	55	13,825	72	19,282	29.38	3	1,195
Limited Review:									
Ogden-Clearfield MSA 2012-2013	9	2,870	9	913	18	3,783	5.76	0	0
Ogden-Clearfield MSA 2014-2015	8	1,678	16	514	24	2,192	3.34	0	0
Provo-Orem MSA	7	334	14	789	21	1,123	1.71	0	0
St. George MSA	6	804	9	1,463	15	2,267	3.45	0	0
UT NonMSA Total 2012-2013	4	182	3	664	7	846	1.29	0	0
UT NonMSA Total 2014-2015	4	1,339	9	5,007	13	6,346	9.67	0	0
Statewide:									
Qualified Investments That Serve AAs	1	200	7	6,543	8	6,743	10.27	0	0
Qualified Investments Outside AAs	1	3	6	5,516	7	5,519	NA	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF UTAH																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Salt Lake City MSA 2012-2013	41.68	39	NA	2.56	23.08	51.28	23.08	2	1	0	0	1	0	4.52	17.99	49.11	28.02
Salt Lake City MSA 2014-2015	39.14	39	54.17	2.56	23.08	51.28	23.08	1	0	0	0	1	0	4.12	18.35	50.07	27.09
Limited Review:																	
Ogden-Clearfield MSA 2012-2013	3.72	16	NA	0.00	37.50	37.50	25.00	1	1	0	-1	1	0	2.66	21.50	51.64	24.20
Ogden-Clearfield MSA 2014-2015	3.82	18	25.00	0.00	33.33	44.44	22.22	0	0	0	0	0	0	1.93	18.11	53.37	26.58
Provo-Orem MSA	4.29	8	11.11	12.50	25.00	37.50	25.00	0	1	0	0	0	-1	6.69	15.99	50.84	26.48
St. George MSA	4.17	4	5.56	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	2.44	83.57	13.98
UT NonMSA Total 2012-2013	0.37	4	NA	0.00	25.00	25.00	50.00	1	0	0	0	0	1	0.00	13.14	71.92	14.94
UT NonMSA Total 2014-2015	2.81	3	4.17	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	14.83	48.58	36.58

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF UTAH																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Salt Lake City MSA 2012-2013	41.68	39	NA	2.56	23.08	51.28	23.08	52	NA	3.85	17.31	40.38	19.23	4.52	17.99	49.11	28.02
Salt Lake City MSA 2014-2015	39.14	39	54.17	2.56	23.08	51.28	23.08	49	58.33	4.08	16.33	44.90	18.37	4.12	18.35	50.07	27.09
Limited Review:																	
Ogden-Clearfield MSA 2012-2013	3.72	16	NA	0.00	37.50	37.50	25.00	17	NA	0.00	35.29	41.18	23.53	2.66	21.50	51.64	24.20
Ogden-Clearfield MSA 2014-2015	3.82	18	25.00	0.00	33.33	44.44	22.22	18	21.43	0.00	33.33	44.44	22.22	1.93	18.11	53.37	26.58
Provo-Orem MSA	4.29	8	11.11	12.50	25.00	37.50	25.00	9	10.71	11.11	22.22	33.33	33.33	6.69	15.99	50.84	26.48
St. George MSA	4.17	4	5.56	0.00	0.00	100.00	0.00	4	4.76	0.00	0.00	100.00	0.00	0.00	2.44	83.57	13.98
UT NonMSA Total 2012-2013	0.37	4	NA	0.00	25.00	25.00	50.00	4	NA	0.00	25.00	25.00	50.00	0.00	13.14	71.92	14.94
UT NonMSA Total 2014-2015	2.81	3	4.17	0.00	33.33	33.33	33.33	4	4.76	0.00	25.00	0.00	75.00	0.00	14.83	48.58	36.58

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF WASHINGTON												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Seattle-Bellevue-Everett MD	50.01	17,327	5,577,183	30,640	1,244,809	142	2,404	71	445,916	48,180	7,270,312	66.91
Limited Review:												
Bellingham MSA	3.80	2,161	510,720	1,437	46,483	60	1,369	4	6,000	3,662	564,572	2.21
Bremerton-Silverdale MSA	3.08	1,562	390,354	1,380	47,803	24	236	5	4,398	2,971	442,791	0.79
Kennewick-Richland MSA	3.83	1,309	204,263	2,166	67,031	206	15,868	7	1,450	3,688	288,612	3.52
Longview MSA	0.99	389	62,765	543	25,157	21	481	1	6,033	954	94,436	0.91
Mount Vernon-Anacortes MSA	2.04	973	202,605	968	24,564	28	408	0	0	1,969	227,577	1.26
Olympia-Tumwater MSA	2.60	946	204,360	1,533	70,962	24	651	0	0	2,503	275,973	0.99
Spokane-Spokane Valley MSA 2012-2013	4.14	1,951	326,218	2,016	80,648	21	2,170	2	1,050	3,990	410,086	3.31
Spokane-Spokane Valley MSA 2014-2015	3.61	1,257	209,179	2,178	65,994	43	2,739	3	800	3,481	278,712	3.31
Tacoma-Lakewood MD	11.76	4,437	967,214	6,838	249,846	47	718	4	7,209	11,326	1,224,987	4.52
Walla Walla MSA 2014-2015	0.37	109	18,534	220	4,644	24	163	0	0	353	23,341	0.13
Wenatchee MSA	0.79	316	73,572	371	33,207	76	10,083	1	150	764	117,012	0.59
Yakima MSA	3.34	1,125	145,009	1,951	97,039	137	6,768	7	42,887	3,220	291,703	4.18
WA NonMSA Total 2012-2013	5.34	2,385	423,886	2,440	71,855	311	41,644	4	1,914	5,140	539,299	3.75
WA NonMSA Total 2014-2015	4.29	1,184	221,723	2,406	64,878	540	44,988	4	2,300	4,134	333,889	3.62
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	3	9,864	3	9,864	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	2	1,150	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.

*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	5,829	47.71	1.84	1.56	15.62	13.72	49.34	46.49	33.20	38.22	3.49	3.32	4.18	3.44	3.24
Limited Review:															
Bellingham MSA	742	6.07	0.10	0.13	16.79	17.92	60.32	55.26	22.79	26.68	3.88	0.00	4.48	4.05	3.01
Bremerton-Silverdale MSA	453	3.71	0.00	0.00	13.17	12.36	61.74	43.93	25.09	43.71	2.64	0.00	2.05	2.14	4.34
Kennewick-Richland MSA	368	3.01	4.28	1.90	20.14	17.66	36.25	35.87	39.33	44.57	3.03	2.26	3.46	3.31	2.69
Longview MSA	153	1.25	3.68	2.61	11.36	12.42	61.41	65.36	23.55	19.61	3.81	3.57	6.71	3.60	3.41
Mount Vernon-Anacortes MSA	281	2.30	0.00	0.00	9.86	8.19	67.82	71.53	22.32	20.28	3.64	0.00	4.08	3.59	3.63
Olympia-Tumwater MSA	346	2.83	0.31	0.29	11.20	8.96	60.68	61.56	27.81	29.19	2.61	0.00	2.65	3.04	1.80
Spokane-Spokane Valley MSA 2012-2013	345	2.82	1.94	0.58	17.87	13.62	43.98	40.58	36.22	45.22	1.89	0.82	1.57	1.59	2.42
Spokane-Spokane Valley MSA 2014-2015	665	5.44	1.94	2.11	17.20	19.55	41.04	41.65	39.82	36.69	4.42	4.73	4.80	4.58	4.07
Tacoma-Lakewood MD	1,547	12.66	0.84	1.81	15.39	16.94	53.64	50.94	30.13	30.32	4.50	6.72	6.33	4.72	3.24
Walla Walla MSA 2014-2015	60	0.49	0.00	0.00	12.14	8.33	57.86	70.00	30.00	21.67	3.62	0.00	3.79	4.11	2.38
Wenatchee MSA	139	1.14	0.00	0.00	0.00	0.00	85.39	82.01	14.61	17.99	4.54	0.00	0.00	4.52	4.66
Yakima MSA	181	1.48	1.28	1.10	25.17	16.02	35.06	35.36	38.49	47.51	2.05	3.13	1.20	2.32	2.12
WA NonMSA Total 2012-2013	540	4.42	0.11	1.11	11.96	6.11	57.82	55.00	30.11	37.78	3.25	13.04	2.08	3.45	3.21
WA NonMSA Total 2014-2015	569	4.66	0.12	0.18	11.94	8.08	57.81	50.97	30.13	40.77	3.76	5.00	4.34	3.60	3.84

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	610	35.97	1.84	0.98	15.62	13.11	49.34	45.90	33.20	40.00	4.62	6.12	3.88	4.39	5.22
Limited Review:															
Bellingham MSA	63	3.71	0.10	0.00	16.79	4.76	60.32	73.02	22.79	22.22	3.13	0.00	0.00	4.72	1.14
Bremerton-Silverdale MSA	81	4.78	0.00	0.00	13.17	12.35	61.74	56.79	25.09	30.86	4.66	0.00	2.13	4.37	6.42
Kennewick-Richland MSA	117	6.90	4.28	5.98	20.14	12.82	36.25	42.74	39.33	38.46	7.68	10.00	10.14	9.55	5.46
Longview MSA	28	1.65	3.68	0.00	11.36	28.57	61.41	50.00	23.55	21.43	9.66	0.00	37.50	4.71	9.76
Mount Vernon-Anacortes MSA	49	2.89	0.00	0.00	9.86	8.16	67.82	69.39	22.32	22.45	7.25	0.00	5.00	8.70	4.08
Olympia-Tumwater MSA	35	2.06	0.31	0.00	11.20	0.00	60.68	65.71	27.81	34.29	2.25	0.00	0.00	2.52	2.25
Spokane-Spokane Valley MSA 2012-2013	107	6.31	1.94	1.87	17.87	13.08	43.98	50.47	36.22	34.58	5.60	0.00	7.53	7.03	3.70
Spokane-Spokane Valley MSA 2014-2015	79	4.66	1.94	1.27	17.20	17.72	41.04	35.44	39.82	45.57	5.16	0.00	6.30	4.33	5.58
Tacoma-Lakewood MD	195	11.50	0.84	1.03	15.39	11.79	53.64	57.44	30.13	29.74	6.48	10.00	5.83	8.26	3.78
Walla Walla MSA 2014-2015	5	0.29	0.00	0.00	12.14	0.00	57.86	20.00	30.00	80.00	2.94	0.00	0.00	1.67	6.45
Wenatchee MSA	5	0.29	0.00	0.00	0.00	0.00	85.39	80.00	14.61	20.00	0.84	0.00	0.00	0.97	0.00
Yakima MSA	102	6.01	1.28	0.00	25.17	27.45	35.06	32.35	38.49	40.20	6.83	0.00	10.45	5.61	6.16
WA NonMSA Total 2012-2013	139	8.20	0.11	0.00	11.96	10.79	57.82	66.19	30.11	23.02	9.88	0.00	6.02	11.97	7.95
WA NonMSA Total 2014-2015	81	4.78	0.12	0.00	11.94	8.64	57.81	59.26	30.13	32.10	6.82	0.00	4.88	7.23	6.57

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	10,766	46.20	1.84	1.16	15.62	12.48	49.34	46.93	33.20	39.43	3.02	2.82	3.12	2.94	3.09
Limited Review:															
Bellingham MSA	1,353	5.81	0.10	0.30	16.79	14.56	60.32	59.42	22.79	25.72	4.27	33.33	2.61	4.92	3.72
Bremerton-Silverdale MSA	1,024	4.39	0.00	0.00	13.17	9.67	61.74	54.79	25.09	35.55	2.96	0.00	1.73	2.51	4.47
Kennewick-Richland MSA	812	3.48	4.28	4.06	20.14	21.80	36.25	36.21	39.33	37.93	3.58	8.54	7.20	2.50	2.80
Longview MSA	205	0.88	3.68	1.95	11.36	6.34	61.41	71.71	23.55	20.00	2.15	2.63	0.74	2.32	2.08
Mount Vernon-Anacortes MSA	640	2.75	0.00	0.00	9.86	6.72	67.82	68.13	22.32	25.16	4.50	0.00	0.69	4.37	6.24
Olympia-Tumwater MSA	563	2.42	0.31	0.00	11.20	8.88	60.68	60.21	27.81	30.91	1.24	0.00	0.69	1.00	1.98
Spokane-Spokane Valley MSA 2012-2013	1,488	6.39	1.94	1.88	17.87	13.51	43.98	41.60	36.22	43.01	5.16	3.51	4.07	5.20	5.67
Spokane-Spokane Valley MSA 2014-2015	512	2.20	1.94	1.95	17.20	13.48	41.04	38.28	39.82	46.29	4.78	4.90	4.20	5.09	4.70
Tacoma-Lakewood MD	2,661	11.42	0.84	0.83	15.39	11.50	53.64	48.25	30.13	39.42	3.04	1.85	3.02	2.70	3.62
Walla Walla MSA 2014-2015	41	0.18	0.00	0.00	12.14	14.63	57.86	53.66	30.00	31.71	3.64	0.00	8.00	2.74	4.09
Wenatchee MSA	170	0.73	0.00	0.00	0.00	0.00	85.39	82.94	14.61	17.06	2.92	0.00	0.00	2.49	5.06
Yakima MSA	837	3.59	1.28	1.55	25.17	28.79	35.06	29.63	38.49	40.02	5.92	11.76	10.43	6.11	3.97
WA NonMSA Total 2012-2013	1,700	7.30	0.11	0.47	11.96	8.41	57.82	53.53	30.11	37.59	5.80	12.50	6.05	6.32	4.97
WA NonMSA Total 2014-2015	530	2.27	0.12	0.00	11.94	12.45	57.81	56.79	30.13	30.75	5.44	0.00	9.07	5.47	4.69

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Seattle-Bellevue-Everett MD	122	57.55	10.52	12.30	27.43	33.61	41.24	43.44	20.82	10.66	4.18	1.54	5.15	3.69	5.22
Limited Review:															
Bellingham MSA	3	1.42	4.39	33.33	44.38	0.00	40.15	33.33	11.08	33.33	2.17	33.33	0.00	0.00	0.00
Bremerton-Silverdale MSA	4	1.89	0.00	0.00	37.78	25.00	53.57	50.00	8.66	25.00	0.00	0.00	0.00	0.00	0.00
Kennewick-Richland MSA	12	5.66	22.82	33.33	23.21	8.33	31.73	50.00	22.24	8.33	16.00	33.33	0.00	33.33	0.00
Longview MSA	3	1.42	5.62	33.33	42.87	0.00	49.25	66.67	2.26	0.00	3.85	25.00	0.00	0.00	0.00
Mount Vernon-Anacortes MSA	0	0.00	0.00	0.00	28.11	0.00	70.15	0.00	1.74	0.00	0.00	0.00	0.00	0.00	0.00
Olympia-Tumwater MSA	2	0.94	3.61	0.00	30.64	50.00	51.88	50.00	13.87	0.00	3.70	0.00	0.00	12.50	0.00
Spokane-Spokane Valley MSA 2012-2013	11	5.19	8.38	9.09	44.18	36.36	32.47	54.55	14.96	0.00	4.82	0.00	6.67	4.76	0.00
Spokane-Spokane Valley MSA 2014-2015	1	0.47	8.38	0.00	43.40	100.00	29.82	0.00	18.39	0.00	0.98	0.00	2.08	0.00	0.00
Tacoma-Lakewood MD	34	16.04	8.38	11.76	35.11	32.35	46.76	41.18	9.75	14.71	2.47	0.00	4.65	1.47	3.85
Walla Walla MSA 2014-2015	3	1.42	0.00	0.00	24.34	33.33	72.05	66.67	3.61	0.00	14.29	0.00	25.00	0.00	0.00
Wenatchee MSA	2	0.94	0.00	0.00	0.00	0.00	97.13	100.00	2.87	0.00	0.00	0.00	0.00	0.00	0.00
Yakima MSA	5	2.36	15.88	20.00	36.61	60.00	34.77	0.00	12.73	20.00	3.57	0.00	11.11	0.00	0.00
WA NonMSA Total 2012-2013	6	2.83	13.73	0.00	24.38	0.00	49.54	66.67	12.35	33.33	7.50	0.00	0.00	5.88	22.22
WA NonMSA Total 2014-2015	4	1.89	15.53	0.00	24.38	0.00	46.58	75.00	13.51	25.00	10.53	0.00	0.00	12.00	20.00

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	30,627	53.67	4.69	4.89	17.27	17.41	44.19	45.90	33.72	31.80	12.38	11.18	13.05	12.83	11.27
Limited Review:															
Bellingham MSA	1,437	2.52	5.57	4.11	20.94	20.88	55.07	60.68	18.42	14.34	8.42	9.76	9.83	7.91	7.50
Bremerton-Silverdale MSA	1,380	2.42	0.00	0.00	14.62	17.90	54.32	57.03	31.06	25.07	10.29	0.00	13.66	9.41	10.20
Kennewick-Richland MSA	2,162	3.79	6.48	5.83	25.73	27.34	32.32	32.70	35.05	34.14	16.12	13.54	17.12	16.58	14.52
Longview MSA	543	0.95	9.75	11.60	24.71	22.28	50.88	55.06	14.66	11.05	13.35	12.73	12.73	14.05	9.55
Mount Vernon-Anacortes MSA	967	1.69	0.00	0.00	16.59	18.92	63.77	59.67	19.63	21.41	17.27	0.00	16.37	15.17	14.10
Olympia-Tumwater MSA	1,533	2.69	2.66	3.85	19.45	20.22	50.14	49.84	27.75	26.09	10.47	19.51	11.40	9.25	9.72
Spokane-Spokane Valley MSA 2012-2013	2,016	3.53	8.59	9.47	26.09	27.48	36.09	35.81	29.23	27.23	14.70	14.25	15.73	15.17	13.38
Spokane-Spokane Valley MSA 2014-2015	2,178	3.82	9.70	10.01	25.43	25.39	33.51	32.87	31.36	31.73	13.82	13.52	14.81	14.22	11.87
Tacoma-Lakewood MD	6,838	11.98	4.51	3.29	19.09	18.79	49.58	49.20	26.82	28.72	15.66	13.96	15.28	15.38	15.74
Walla Walla MSA 2014-2015	220	0.39	0.00	0.00	21.09	17.27	55.77	54.55	23.06	28.18	15.85	0.00	14.01	14.22	17.78
Wenatchee MSA	371	0.65	0.00	0.00	0.00	0.00	88.73	82.48	11.27	17.52	5.78	0.00	0.00	5.19	9.89
Yakima MSA	1,951	3.42	7.65	6.87	28.76	27.42	32.99	34.65	30.61	31.06	16.91	13.02	20.22	15.89	15.16
WA NonMSA Total 2012-2013	2,440	4.28	0.53	0.86	15.41	19.06	57.22	54.67	26.84	25.41	16.66	23.40	20.14	16.68	14.65
WA NonMSA Total 2014-2015	2,406	4.22	0.67	0.71	15.07	17.41	57.23	56.57	27.02	25.31	16.72	18.37	20.27	16.18	14.02

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF WASHINGTON															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	142	8.33	2.24	1.41	14.97	10.56	51.70	45.07	31.07	42.96	21.34	0.00	47.62	18.79	22.06
Limited Review:															
Bellingham MSA	60	3.52	0.41	0.00	14.51	6.67	74.09	90.00	10.98	3.33	14.12	0.00	25.00	13.07	8.33
Bremerton-Silverdale MSA	24	1.41	0.00	0.00	7.58	4.17	59.43	37.50	33.00	58.33	33.33	0.00	33.33	33.33	33.33
Kennewick-Richland MSA	206	12.09	2.04	0.97	25.74	29.61	55.46	59.22	16.57	10.19	26.56	100.00	24.29	26.49	20.69
Longview MSA	21	1.23	8.04	0.00	13.07	0.00	58.29	95.24	20.60	4.76	52.94	0.00	0.00	57.14	100.00
Mount Vernon-Anacortes MSA	28	1.64	0.00	0.00	8.95	10.71	57.52	53.57	33.52	35.71	19.28	0.00	0.00	20.83	18.18
Olympia-Tumwater MSA	24	1.41	0.84	0.00	12.62	29.17	61.15	50.00	25.39	20.83	37.50	0.00	75.00	25.00	41.67
Spokane-Spokane Valley MSA 2012-2013	21	1.23	2.98	0.00	12.65	0.00	47.09	61.90	37.28	38.10	9.90	0.00	0.00	12.96	6.98
Spokane-Spokane Valley MSA 2014-2015	43	2.52	3.04	2.33	11.50	0.00	43.53	58.14	41.93	39.53	14.41	100.00	0.00	14.08	14.71
Tacoma-Lakewood MD	47	2.76	1.47	0.00	15.77	4.26	55.56	63.83	27.21	31.91	34.33	0.00	10.00	35.90	38.46
Walla Walla MSA 2014-2015	24	1.41	0.00	0.00	7.97	8.33	45.69	29.17	46.34	62.50	8.43	0.00	0.00	11.54	5.45
Wenatchee MSA	76	4.46	0.00	0.00	0.00	0.00	87.20	89.47	12.80	10.53	20.75	0.00	0.00	20.43	50.00
Yakima MSA	137	8.04	1.72	0.00	16.38	15.33	57.44	70.07	24.46	14.60	14.24	0.00	8.77	14.78	15.56
WA NonMSA Total 2012-2013	311	18.25	0.28	0.32	12.99	22.19	63.37	63.67	23.37	13.83	14.86	20.00	24.67	14.45	9.17
WA NonMSA Total 2014-2015	540	31.69	0.36	0.37	12.54	12.78	66.31	71.67	20.80	15.19	22.59	40.00	23.87	23.13	18.07

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	5,829	47.70	20.39	3.71	17.77	9.86	22.17	15.70	39.67	70.72	1.45	0.77	0.83	0.86	2.03
Limited Review:															
Bellingham MSA	742	6.07	20.19	8.33	17.67	15.28	23.83	22.22	38.31	54.17	0.45	1.19	0.30	0.19	0.61
Bremerton-Silverdale MSA	453	3.71	17.87	0.54	18.99	10.33	22.92	15.76	40.22	73.37	1.25	0.00	0.50	0.38	2.50
Kennewick-Richland MSA	368	3.01	21.88	8.57	17.46	21.14	19.97	31.43	40.69	38.86	0.71	0.77	0.44	0.96	0.66
Longview MSA	153	1.25	20.72	5.71	17.78	17.14	20.56	22.86	40.95	54.29	0.31	0.00	0.00	0.61	0.28
Mount Vernon-Anacortes MSA	284	2.32	18.77	8.24	17.29	24.71	25.39	20.00	38.55	47.06	1.16	3.53	1.20	0.64	1.29
Olympia-Tumwater MSA	346	2.83	19.17	5.81	17.53	19.77	23.91	30.23	39.39	44.19	0.53	0.60	0.50	0.29	0.72
Spokane-Spokane Valley MSA 2012-2013	345	2.82	19.78	10.64	18.33	21.81	22.23	27.13	39.66	40.43	1.29	1.02	0.73	1.61	1.56
Spokane-Spokane Valley MSA 2014-2015	665	5.44	19.17	4.70	17.91	16.78	21.91	24.16	41.01	54.36	1.01	0.57	0.59	0.70	1.67
Tacoma-Lakewood MD	1,547	12.66	19.72	3.92	18.37	24.65	22.09	25.77	39.83	45.66	0.85	0.50	1.08	0.81	0.80
Walla Walla MSA 2014-2015	60	0.49	21.54	0.00	17.79	21.43	18.58	28.57	42.09	50.00	0.63	0.00	0.60	0.98	0.52
Wenatchee MSA	139	1.14	17.53	0.00	18.93	7.27	22.41	14.55	41.14	78.18	1.59	0.00	0.67	1.49	1.86
Yakima MSA	181	1.48	22.37	10.17	16.86	22.88	19.89	19.49	40.88	47.46	1.20	1.69	1.51	0.68	1.31
WA NonMSA Total 2012-2013	540	4.42	20.40	3.56	17.44	15.30	20.86	18.15	41.30	62.99	1.92	1.37	1.59	1.25	2.44
WA NonMSA Total 2014-2015	569	4.66	20.34	6.05	17.45	10.23	21.11	17.21	41.10	66.51	1.55	2.91	0.90	0.93	1.99

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	610	35.97	20.39	7.73	17.77	18.63	22.17	25.31	39.67	48.33	4.57	3.70	5.67	4.04	4.60
Limited Review:															
Bellingham MSA	63	3.71	20.19	8.57	17.67	22.86	23.83	25.71	38.31	42.86	2.69	0.00	3.13	4.20	1.80
Bremerton-Silverdale MSA	81	4.78	17.87	12.12	18.99	13.64	22.92	19.70	40.22	54.55	3.86	0.95	2.50	2.17	7.24
Kennewick-Richland MSA	117	6.90	21.88	12.39	17.46	17.70	19.97	30.97	40.69	38.94	7.52	12.50	7.23	11.57	4.68
Longview MSA	28	1.65	20.72	0.00	17.78	14.29	20.56	35.71	40.95	50.00	9.93	0.00	8.33	18.42	6.58
Mount Vernon-Anacortes MSA	49	2.89	18.77	6.52	17.29	34.78	25.39	17.39	38.55	41.30	7.54	5.88	11.76	5.77	7.29
Olympia-Tumwater MSA	35	2.06	19.17	12.50	17.53	18.75	23.91	28.13	39.39	40.63	2.33	0.00	0.00	3.23	2.92
Spokane-Spokane Valley MSA 2012-2013	107	6.31	19.78	17.14	18.33	30.48	22.23	18.10	39.66	34.29	5.69	9.09	8.96	4.38	4.39
Spokane-Spokane Valley MSA 2014-2015	79	4.66	19.17	11.43	17.91	22.86	21.91	24.29	41.01	41.43	4.59	5.56	4.32	5.34	4.13
Tacoma-Lakewood MD	195	11.50	19.72	9.68	18.37	18.28	22.09	31.72	39.83	40.32	6.65	5.26	6.58	9.33	5.52
Walla Walla MSA 2014-2015	5	0.29	21.54	0.00	17.79	0.00	18.58	60.00	42.09	40.00	3.16	0.00	0.00	9.38	0.00
Wenatchee MSA	5	0.29	17.53	0.00	18.93	40.00	22.41	20.00	41.14	40.00	0.88	0.00	0.00	3.57	0.00
Yakima MSA	102	6.01	22.37	9.00	16.86	14.00	19.89	28.00	40.88	49.00	6.98	11.11	0.00	11.59	6.74
WA NonMSA Total 2012-2013	139	8.20	20.40	8.13	17.44	19.51	20.86	26.83	41.30	45.53	8.39	14.71	11.88	9.84	6.30
WA NonMSA Total 2014-2015	81	4.78	20.34	6.58	17.45	18.42	21.11	19.74	41.10	55.26	6.83	4.69	11.84	6.25	6.20

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF WASHINGTON															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Seattle-Bellevue-Everett MD	10,766	46.20	20.39	8.67	17.77	17.35	22.17	23.08	39.67	50.89	2.97	3.91	3.17	2.46	3.06
Limited Review:															
Bellingham MSA	1,353	5.81	20.19	7.95	17.67	19.51	23.83	24.81	38.31	47.73	2.82	5.26	3.59	2.31	2.63
Bremerton-Silverdale MSA	1,024	4.39	17.87	6.76	18.99	15.11	22.92	25.76	40.22	52.37	3.39	3.61	1.41	2.89	4.29
Kennewick-Richland MSA	812	3.48	21.88	11.13	17.46	21.10	19.97	28.18	40.69	39.60	4.33	5.18	6.08	4.06	3.46
Longview MSA	205	0.88	20.72	6.67	17.78	18.79	20.56	26.67	40.95	47.88	2.48	3.80	2.20	1.95	2.67
Mount Vernon-Anacortes MSA	640	2.75	18.77	9.19	17.29	19.46	25.39	26.22	38.55	45.14	4.04	5.95	5.48	4.57	3.08
Olympia-Tumwater MSA	563	2.42	19.17	10.28	17.53	15.89	23.91	30.84	39.39	42.99	1.52	1.69	1.00	0.95	2.02
Spokane-Spokane Valley MSA 2012-2013	1,488	6.39	19.78	10.92	18.33	24.17	22.23	23.10	39.66	41.81	5.35	5.80	6.51	5.32	4.78
Spokane-Spokane Valley MSA 2014-2015	512	2.20	19.17	10.62	17.91	22.47	21.91	24.69	41.01	42.22	4.97	6.45	6.51	4.71	4.25
Tacoma-Lakewood MD	2,661	11.42	19.72	6.79	18.37	18.70	22.09	26.91	39.83	47.60	3.86	4.30	4.40	3.52	3.83
Walla Walla MSA 2014-2015	41	0.18	21.54	2.56	17.79	23.08	18.58	25.64	42.09	48.72	4.57	4.55	7.79	4.59	3.23
Wenatchee MSA	170	0.73	17.53	7.83	18.93	9.57	22.41	20.00	41.14	62.61	1.96	0.00	1.19	1.95	2.24
Yakima MSA	837	3.59	22.37	8.66	16.86	21.96	19.89	25.71	40.88	43.67	7.38	12.39	13.08	7.32	5.16
WA NonMSA Total 2012-2013	1,700	7.30	20.40	5.00	17.44	15.96	20.86	26.14	41.30	52.89	5.14	4.75	6.05	5.71	4.74
WA NonMSA Total 2014-2015	530	2.27	20.34	6.28	17.45	20.77	21.11	24.64	41.10	48.31	5.69	5.22	7.46	5.47	5.37

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF WASHINGTON									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Seattle-Bellevue-Everett MD	30,640	53.67	81.01	55.32	93.35	2.25	4.40	12.38	13.49
Limited Review:									
Bellingham MSA	1,437	2.52	83.07	49.83	94.78	2.09	3.13	8.42	7.91
Bremerton-Silverdale MSA	1,380	2.42	83.79	67.54	93.48	2.83	3.70	10.29	12.79
Kennewick-Richland MSA	2,166	3.79	78.78	58.22	94.32	2.45	3.23	16.12	18.09
Longview MSA	543	0.95	79.74	50.83	93.19	1.10	5.71	13.35	17.30
Mount Vernon-Anacortes MSA	968	1.70	80.48	53.31	97.21	0.72	2.07	17.27	9.74
Olympia-Tumwater MSA	1,533	2.69	81.12	57.40	91.13	3.85	5.02	10.47	10.93
Spokane-Spokane Valley MSA 2012-2013	2,016	3.53	69.67	52.13	92.01	4.02	3.97	14.70	16.38
Spokane-Spokane Valley MSA 2014-2015	2,178	3.82	79.69	54.50	94.63	2.57	2.80	13.82	14.47
Tacoma-Lakewood MD	6,838	11.98	81.19	59.96	92.98	3.29	3.73	15.66	18.84
Walla Walla MSA 2014-2015	220	0.39	80.38	64.09	96.82	1.36	1.82	15.85	18.44
Wenatchee MSA	371	0.65	80.30	53.64	81.13	9.16	9.70	5.78	5.68
Yakima MSA	1,951	3.42	77.01	50.85	90.42	3.18	6.41	16.91	16.89
WA NonMSA Total 2012-2013	2,440	4.27	71.78	60.20	94.71	2.38	2.91	16.66	18.99
WA NonMSA Total 2014-2015	2,406	4.21	81.18	56.98	95.14	2.45	2.41	16.72	16.37

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF WASHINGTON Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Seattle-Bellevue-Everett MD	142	8.33	95.60	59.15	96.48	3.52	0.00	21.34	29.20
Limited Review:									
Bellingham MSA	60	3.52	95.75	51.67	96.67	0.00	3.33	14.12	15.38
Bremerton-Silverdale MSA	24	1.41	97.64	75.00	100.00	0.00	0.00	33.33	35.71
Kennewick-Richland MSA	206	12.09	91.39	63.11	79.13	11.17	9.71	26.56	29.92
Longview MSA	21	1.23	93.47	57.14	100.00	0.00	0.00	52.94	61.54
Mount Vernon-Anacortes MSA	28	1.64	92.76	28.57	96.43	3.57	0.00	19.28	22.50
Olympia-Tumwater MSA	24	1.41	96.07	50.00	95.83	0.00	4.17	37.50	25.00
Spokane-Spokane Valley MSA 2012-2013	21	1.23	97.63	90.48	66.67	14.29	19.05	9.90	14.52
Spokane-Spokane Valley MSA 2014-2015	43	2.52	97.20	67.44	81.40	4.65	13.95	14.41	18.87
Tacoma-Lakewood MD	47	2.76	95.34	38.30	95.74	2.13	2.13	34.33	28.13
Walla Walla MSA 2014-2015	24	1.41	97.20	45.83	100.00	0.00	0.00	8.43	9.30
Wenatchee MSA	76	4.46	94.17	82.89	61.84	17.11	21.05	20.75	22.97
Yakima MSA	137	8.04	90.06	51.82	88.32	5.84	5.84	14.24	14.47
WA NonMSA Total 2012-2013	311	18.25	96.69	79.74	57.23	23.79	18.97	14.86	18.47
WA NonMSA Total 2014-2015	540	31.69	96.32	70.19	75.00	12.22	12.78	22.59	26.91

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF WASHINGTON Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Seattle-Bellevue-Everett MD	74	33,144	545	200,740	619	233,884	46.16	3	8,010
Limited Review:									
Bellingham MSA	12	763	46	3,223	58	3,986	0.79	0	0
Bremerton-Silverdale MSA	8	7,820	79	12,095	87	19,915	3.93	0	0
Kennewick-Richland MSA	31	3,822	21	4,699	52	8,521	1.68	0	0
Longview MSA	9	558	36	6,998	45	7,556	1.49	0	0
Mount Vernon-Anacortes MSA	12	1,366	29	1,750	41	3,116	0.62	0	0
Olympia-Tumwater MSA	12	2,143	17	3,209	29	5,352	1.06	0	0
Spokane-Spokane Valley MSA 2012-2013	37	23,399	59	13,717	96	37,116	7.33	4	17,458
Spokane-Spokane Valley MSA 2014-2015	16	7,307	62	4,358	78	11,665	2.30	0	0
Tacoma-Lakewood MD	23	4,484	98	45,486	121	49,970	9.86	1	20
Walla Walla MSA 2014-2015	3	378	0	0	3	378	0.07	0	0
Wenatchee MSA	5	340	13	1,560	18	1,900	0.38	0	0
Yakima MSA	33	4,715	51	19,524	84	24,239	4.78	0	0
WA NonMSA Total 2012-2013	34	60,120	37	7,853	71	67,973	13.42	0	0
WA NonMSA Total 2014-2015	26	6,508	49	22,793	75	29,301	5.78	1	20
Statewide:									
Qualified Investments That Serve AAs	4	1,212	56	544	60	1,756	0.35	0	0
Qualified Investments Outside AAs	1	84	2	20	3	104	NA	0	0

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF WASHINGTON																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Seattle-Bellevue-Everett MD	66.91	68	40.72	7.35	27.94	39.71	23.53	7	5	2	0	1	-2	4.50	20.34	47.23	27.72
Limited Review:																	
Bellingham MSA	2.21	4	2.40	25.00	0.00	75.00	0.00	0	0	0	0	0	0	0.81	22.82	57.66	18.71
Bremerton-Silverdale MSA	0.79	4	2.40	0.00	50.00	50.00	0.00	1	1	0	0	0	0	0.00	19.47	57.87	22.66
Kennewick-Richland MSA	3.52	9	5.39	22.22	33.33	33.33	11.11	0	0	0	0	0	0	9.46	25.13	34.94	30.47
Longview MSA	0.91	2	1.20	0.00	50.00	50.00	0.00	0	0	0	0	0	0	6.44	17.22	58.17	18.18
Mount Vernon-Anacortes MSA	1.26	4	2.40	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	12.79	69.18	18.03
Olympia-Tumwater MSA	0.99	4	2.40	25.00	25.00	25.00	25.00	0	0	0	0	0	0	0.68	14.60	60.17	24.56
Spokane-Spokane Valley MSA 2012-2013	3.31	16	NA	6.25	43.75	31.25	18.75	0	0	0	0	0	0	3.56	26.18	39.63	30.63
Spokane-Spokane Valley MSA 2014-2015	3.31	16	9.58	6.25	31.25	37.50	25.00	0	0	0	0	0	0	3.56	25.45	36.77	34.22
Tacoma-Lakewood MD	4.52	20	11.98	5.00	5.00	70.00	20.00	2	3	0	-1	0	0	2.52	22.24	50.77	24.47
Walla Walla MSA 2014-2015	0.13	1	0.60	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.82	58.46	22.78
Wenatchee MSA	0.59	1	0.60	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	89.72	10.28
Yakima MSA	4.18	9	5.39	11.11	44.44	22.22	22.22	0	1	0	0	-1	0	4.13	34.16	34.40	27.32
WA NonMSA Total 2012-2013	3.75	26	NA	3.85	15.38	69.23	11.54	0	0	0	0	0	0	1.61	19.92	53.99	24.07
WA NonMSA Total 2014-2015	3.62	25	14.97	0.00	20.00	68.00	12.00	0	0	0	0	0	0	1.80	20.51	53.46	24.22

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF WASHINGTON																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Seattle-Bellevue-Everett MD	66.91	68	40.72	7.35	27.94	39.71	23.53	158	50.80	22.15	20.89	37.97	18.35	4.50	20.34	47.23	27.72
Limited Review:																	
Bellingham MSA	2.21	4	2.40	25.00	0.00	75.00	0.00	8	2.57	25.00	12.50	62.50	0.00	0.81	22.82	57.66	18.71
Bremerton-Silverdale MSA	0.79	4	2.40	0.00	50.00	50.00	0.00	5	1.61	0.00	40.00	60.00	0.00	0.00	19.47	57.87	22.66
Kennewick-Richland MSA	3.52	9	5.39	22.22	33.33	33.33	11.11	16	5.14	18.75	25.00	25.00	25.00	9.46	25.13	34.94	30.47
Longview MSA	0.91	2	1.20	0.00	50.00	50.00	0.00	4	1.29	0.00	50.00	50.00	0.00	6.44	17.22	58.17	18.18
Mount Vernon-Anacortes MSA	1.26	4	2.40	0.00	50.00	50.00	0.00	5	1.61	0.00	40.00	60.00	0.00	0.00	12.79	69.18	18.03
Olympia-Tumwater MSA	0.99	4	2.40	25.00	25.00	25.00	25.00	8	2.57	12.50	25.00	25.00	37.50	0.68	14.60	60.17	24.56
Spokane-Spokane Valley MSA 2012-2013	3.31	16	NA	6.25	43.75	31.25	18.75	38	NA	2.63	44.74	31.58	21.05	3.56	26.18	39.63	30.63
Spokane-Spokane Valley MSA 2014-2015	3.31	16	9.58	6.25	31.25	37.50	25.00	34	10.93	5.88	29.41	38.24	26.47	3.56	25.45	36.77	34.22
Tacoma-Lakewood MD	4.52	20	11.98	5.00	5.00	70.00	20.00	26	8.36	3.85	11.54	69.23	15.38	2.52	22.24	50.77	24.47
Walla Walla MSA 2014-2015	0.13	1	0.60	0.00	0.00	100.00	0.00	2	0.64	0.00	0.00	100.00	0.00	0.00	14.82	58.46	22.78
Wenatchee MSA	0.59	1	0.60	0.00	0.00	100.00	0.00	2	0.64	0.00	0.00	100.00	0.00	0.00	0.00	89.72	10.28
Yakima MSA	4.18	9	5.39	11.11	44.44	22.22	22.22	14	4.50	14.29	28.57	21.43	35.71	4.13	34.16	34.40	27.32
WA NonMSA Total 2012-2013	3.75	26	NA	3.85	15.38	69.23	11.54	32	NA	0.00	18.75	71.88	9.38	1.61	19.92	53.99	24.07
WA NonMSA Total 2014-2015	3.62	25	14.97	0.00	20.00	68.00	12.00	29	9.32	0.00	20.69	68.97	10.34	1.80	20.51	53.46	24.22

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF WISCONSIN												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Madison MSA 2012-2013	7.28	2,401	486,761	4,911	109,111	31	474	4	27,690	7,347	624,036	2.74
Madison MSA 2014-2015	5.79	963	261,814	4,779	106,713	92	1,338	11	6,485	5,845	376,350	2.74
Milwaukee-Waukesha-West Allis MSA	38.80	11,128	2,082,222	27,836	841,954	159	1,860	35	260,573	39,158	3,186,609	86.49
Limited Review:												
Appleton MSA	4.33	1,070	176,933	3,239	131,807	59	480	0	0	4,368	309,220	0.48
Eau Claire MSA	3.10	804	114,052	2,267	56,098	53	744	1	392	3,125	171,286	0.80
Fond du Lac MSA	2.65	1,361	168,562	1,283	27,496	34	1,294	1	370	2,679	197,722	0.52
Green Bay MSA	6.18	1,784	278,721	4,418	75,442	38	257	0	0	6,240	354,420	0.64
Janesville-Beloit MSA	1.75	389	49,815	1,357	15,735	23	203	0	0	1,769	65,753	0.07
LaCrosse-Onalaska MSA	1.57	355	59,338	1,216	28,841	16	86	2	100	1,589	88,365	0.67
Oshkosh-Neenah MSA	3.16	1,125	151,147	2,033	57,465	25	344	5	8,268	3,188	217,224	0.63
Racine MSA	3.10	721	113,055	2,361	56,932	45	2,351	1	7,902	3,128	180,240	0.39
Sheboygan MSA	2.56	1,089	134,258	1,457	40,103	39	308	3	1,593	2,588	176,262	0.62
Wausau MSA	3.42	746	101,677	2,610	59,662	94	1,831	4	225	3,454	163,395	0.50
WI NonMSA Total 2012-2013	8.95	3,810	523,756	5,058	107,850	162	9,926	3	2,794	9,033	644,326	1.36
WI NonMSA Total 2014-2015	7.33	1,856	260,286	5,184	104,276	356	9,323	1	2,278	7,397	376,163	1.36
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	3	15,619	3	15,619	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	8	19,893	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.

** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.

*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Madison MSA 2012-2013	658	7.12	1.53	1.67	12.11	11.25	63.03	55.17	23.33	31.91	3.43	2.73	2.96	3.02	4.56
Madison MSA 2014-2015	528	5.71	1.48	1.52	9.97	9.66	62.54	57.20	26.01	31.63	2.70	5.66	2.68	2.61	2.77
Milwaukee-Waukesha-West Allis MSA	3,399	36.76	6.74	6.50	12.89	15.95	39.84	36.22	40.52	41.34	3.64	11.97	6.09	3.30	2.92
Limited Review:															
Appleton MSA	371	4.01	0.00	0.00	6.20	3.77	75.79	69.00	18.01	27.22	2.56	0.00	2.60	2.15	3.88
Eau Claire MSA	320	3.46	0.00	0.00	11.92	8.75	73.51	75.94	14.57	15.31	4.47	0.00	3.47	4.44	5.35
Fond du Lac MSA	398	4.30	0.00	0.00	6.15	7.79	85.44	81.91	8.42	10.30	7.57	0.00	7.69	7.78	5.69
Green Bay MSA	552	5.97	0.96	0.36	15.92	9.24	52.12	49.09	31.01	41.30	3.50	0.00	1.97	3.66	3.95
Janesville-Beloit MSA	152	1.64	4.55	1.97	15.66	14.47	55.87	61.84	23.92	21.71	1.69	0.00	1.22	1.92	1.62
LaCrosse-Onalaska MSA	166	1.80	0.66	2.41	4.94	1.81	74.53	69.28	19.87	26.51	2.95	9.09	0.00	2.71	4.38
Oshkosh-Neenah MSA	434	4.69	0.00	0.00	10.85	9.91	69.87	62.21	19.27	27.88	3.83	0.00	4.45	3.55	4.33
Racine MSA	218	2.36	2.21	3.21	10.75	10.55	54.91	54.59	32.13	31.65	2.46	4.35	4.68	2.12	2.46
Sheboygan MSA	245	2.65	0.00	0.00	18.68	18.78	73.40	68.16	7.92	13.06	5.04	0.00	5.33	4.77	6.37
Wausau MSA	271	2.93	0.00	0.00	13.86	12.55	75.82	76.38	10.32	11.07	4.70	0.00	5.11	5.18	1.87
WI NonMSA Total 2012-2013	773	8.36	0.00	0.00	6.02	5.82	76.28	73.22	17.70	20.96	5.63	0.00	5.76	5.33	6.81
WI NonMSA Total 2014-2015	762	8.24	0.00	0.00	5.59	5.91	74.63	71.00	19.78	23.10	4.99	0.00	5.89	4.71	5.73

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Madison MSA 2012-2013	92	6.13	1.53	1.09	12.11	13.04	63.03	56.52	23.33	29.35	3.98	7.69	6.15	3.25	4.72
Madison MSA 2014-2015	64	4.27	1.48	0.00	9.97	12.50	62.54	43.75	26.01	43.75	4.67	0.00	7.69	3.34	7.11
Milwaukee-Waukesha-West Allis MSA	512	34.13	6.74	6.45	12.89	6.84	39.84	35.16	40.52	51.56	5.24	8.87	2.89	4.95	5.64
Limited Review:															
Appleton MSA	34	2.27	0.00	0.00	6.20	2.94	75.79	82.35	18.01	14.71	1.58	0.00	0.00	1.97	0.77
Eau Claire MSA	61	4.07	0.00	0.00	11.92	11.48	73.51	75.41	14.57	13.11	5.53	0.00	8.00	5.52	3.45
Fond du Lac MSA	68	4.53	0.00	0.00	6.15	2.94	85.44	89.71	8.42	7.35	5.29	0.00	0.00	6.25	0.00
Green Bay MSA	53	3.53	0.96	0.00	15.92	11.32	52.12	52.83	31.01	35.85	4.19	0.00	4.55	3.65	4.79
Janesville-Beloit MSA	16	1.07	4.55	0.00	15.66	25.00	55.87	56.25	23.92	18.75	0.45	0.00	0.00	0.75	0.00
LaCrosse-Onalaska MSA	18	1.20	0.66	0.00	4.94	11.11	74.53	55.56	19.87	33.33	0.80	0.00	4.35	0.37	1.32
Oshkosh-Neenah MSA	50	3.33	0.00	0.00	10.85	16.00	69.87	76.00	19.27	8.00	3.37	0.00	1.89	4.00	2.17
Racine MSA	30	2.00	2.21	6.67	10.75	3.33	54.91	43.33	32.13	46.67	4.02	16.67	0.00	2.83	5.71
Sheboygan MSA	68	4.53	0.00	0.00	18.68	13.24	73.40	70.59	7.92	16.18	4.62	0.00	1.43	4.57	11.43
Wausau MSA	54	3.60	0.00	0.00	13.86	18.52	75.82	72.22	10.32	9.26	2.87	0.00	5.13	2.61	2.63
WI NonMSA Total 2012-2013	212	14.13	0.00	0.00	0.06	0.08	0.76	0.78	0.18	0.14	0.08	0.00	0.14	0.08	0.06
WI NonMSA Total 2014-2015	168	11.20	0.00	0.00	5.59	8.93	74.63	79.76	19.78	11.31	7.50	0.00	18.00	7.54	4.98

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Madison MSA 2012-2013	1,636	8.80	1.53	0.37	12.11	9.78	63.03	53.67	23.33	36.19	4.07	1.31	3.32	3.70	5.38
Madison MSA 2014-2015	359	1.93	1.48	0.84	9.97	8.91	62.54	56.82	26.01	33.43	2.16	2.44	2.71	1.98	2.37
Milwaukee-Waukesha-West Allis MSA	7,042	37.89	6.74	2.39	12.89	7.82	39.84	33.77	40.52	56.02	3.73	5.99	4.77	3.56	3.58
Limited Review:															
Appleton MSA	657	3.54	0.00	0.00	6.20	5.02	75.79	69.71	18.01	25.27	1.80	0.00	2.36	1.89	1.40
Eau Claire MSA	421	2.27	0.00	0.00	11.92	8.31	73.51	73.87	14.57	17.81	4.71	0.00	3.24	5.08	3.80
Fond du Lac MSA	895	4.82	0.00	0.00	6.15	7.49	85.44	80.00	8.42	12.51	10.35	0.00	9.68	10.20	12.00
Green Bay MSA	1,174	6.32	0.96	0.34	15.92	10.48	52.12	44.55	31.01	44.63	2.62	5.26	2.43	2.41	2.90
Janesville-Beloit MSA	221	1.19	4.55	1.81	15.66	9.05	55.87	50.68	23.92	38.46	1.00	0.00	0.00	0.87	1.65
LaCrosse-Onalaska MSA	168	0.90	0.66	3.57	4.94	3.57	74.53	62.50	19.87	30.36	1.83	5.26	1.06	1.72	2.34
Oshkosh-Neenah MSA	633	3.41	0.00	0.00	10.85	12.01	69.87	62.72	19.27	25.28	2.80	0.00	5.08	2.53	2.62
Racine MSA	452	2.43	2.21	0.88	10.75	6.86	54.91	51.11	32.13	41.15	2.94	6.25	3.72	3.24	2.34
Sheboygan MSA	773	4.16	0.00	0.00	18.68	22.51	73.40	66.36	7.92	11.13	8.01	0.00	11.62	6.99	9.03
Wausau MSA	415	2.23	0.00	0.00	13.86	7.47	75.82	77.59	10.32	14.94	4.47	0.00	2.47	4.87	3.95
WI NonMSA Total 2012-2013	2,818	15.16	0.00	0.00	6.02	6.96	76.28	76.26	17.70	16.78	7.38	0.00	8.53	7.66	5.99
WI NonMSA Total 2014-2015	919	4.95	0.00	0.00	5.59	7.29	74.63	76.61	19.78	16.10	6.05	0.00	7.43	6.44	4.41

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Madison MSA 2012-2013	15	5.51	15.99	13.33	22.62	26.67	41.96	46.67	19.43	13.33	3.98	2.56	9.09	2.02	5.26
Madison MSA 2014-2015	12	4.41	14.30	0.00	18.73	58.33	46.82	33.33	20.15	8.33	2.13	0.00	6.06	1.90	0.00
Milwaukee-Waukesha-West Allis MSA	175	64.34	15.39	24.57	15.91	29.71	45.42	37.71	23.28	8.00	9.87	22.58	13.19	5.49	5.13
Limited Review:															
Appleton MSA	8	2.94	0.00	0.00	14.90	25.00	79.35	75.00	5.75	0.00	8.70	0.00	50.00	5.00	0.00
Eau Claire MSA	2	0.74	0.00	0.00	15.41	0.00	65.47	100.00	19.11	0.00	0.00	0.00	0.00	0.00	0.00
Fond du Lac MSA	0	0.00	0.00	0.00	40.14	0.00	55.33	0.00	4.53	0.00	0.00	0.00	0.00	0.00	0.00
Green Bay MSA	5	1.84	2.06	0.00	25.11	20.00	57.53	80.00	15.29	0.00	3.92	0.00	5.00	4.76	0.00
Janesville-Beloit MSA	0	0.00	11.54	0.00	22.44	0.00	38.68	0.00	27.34	0.00	0.00	0.00	0.00	0.00	0.00
LaCrosse-Onalaska MSA	3	1.10	12.55	0.00	32.38	66.67	47.00	0.00	8.07	33.33	0.00	0.00	0.00	0.00	0.00
Oshkosh-Neenah MSA	8	2.94	0.00	0.00	27.85	25.00	58.95	75.00	13.20	0.00	0.00	0.00	0.00	0.00	0.00
Racine MSA	21	7.72	2.28	4.76	21.88	28.57	49.57	42.86	26.27	23.81	13.33	0.00	9.09	13.33	25.00
Sheboygan MSA	3	1.10	0.00	0.00	41.94	0.00	52.40	100.00	5.66	0.00	5.26	0.00	0.00	14.29	0.00
Wausau MSA	6	2.21	0.00	0.00	22.79	0.00	58.02	50.00	19.20	50.00	9.09	0.00	0.00	14.29	0.00
WI NonMSA Total 2012-2013	7	2.57	0.00	0.00	8.44	14.29	80.11	85.71	11.45	0.00	4.71	0.00	12.50	4.41	0.00
WI NonMSA Total 2014-2015	7	2.57	0.00	0.00	8.13	0.00	76.52	85.71	15.36	14.29	2.11	0.00	0.00	1.33	6.67

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	% of Businesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Madison MSA 2012-2013	4,898	7.00	4.32	5.98	15.41	15.78	56.07	56.51	23.63	21.72	32.39	42.42	32.04	33.05	28.05
Madison MSA 2014-2015	4,775	6.82	3.92	4.21	13.05	12.84	56.09	56.59	26.30	26.37	25.77	30.68	26.05	25.94	23.27
Milwaukee-Waukesha-West Allis MSA	27,836	39.77	9.02	5.05	13.85	9.95	38.82	36.81	38.28	48.19	27.64	22.48	25.87	27.28	28.15
Limited Review:															
Appleton MSA	3,239	4.63	0.00	0.00	11.02	11.64	76.48	70.92	12.49	17.44	24.17	0.00	26.09	23.43	23.23
Eau Claire MSA	2,267	3.24	0.00	0.00	14.78	14.03	71.99	69.48	13.23	16.50	30.45	0.00	33.79	27.99	35.95
Fond du Lac MSA	1,283	1.83	0.00	0.00	18.74	14.73	75.49	73.81	5.77	11.46	23.41	0.00	20.97	22.67	29.73
Green Bay MSA	4,417	6.31	1.50	0.86	16.57	17.32	53.21	52.25	28.72	29.57	26.76	35.29	26.77	27.29	23.41
Janesville-Beloit MSA	1,357	1.94	7.47	5.16	18.96	15.99	45.88	44.14	27.69	34.71	22.82	22.86	23.86	19.42	25.09
LaCrosse-Onalaska MSA	1,216	1.74	3.38	4.61	22.01	21.13	60.72	57.07	13.89	17.19	22.88	26.47	22.82	21.38	23.53
Oshkosh-Neenah MSA	2,033	2.90	0.00	0.00	15.46	16.28	66.01	66.99	18.53	16.72	26.62	0.00	29.76	25.59	27.67
Racine MSA	2,361	3.37	3.60	3.81	10.93	9.57	55.07	53.71	30.41	32.91	22.87	23.58	25.00	22.09	22.80
Sheboygan MSA	1,457	2.08	0.00	0.00	30.20	31.98	62.28	59.99	7.52	8.03	26.33	0.00	31.37	24.09	21.49
Wausau MSA	2,610	3.73	0.00	0.00	17.82	14.18	67.05	63.91	15.13	21.92	32.87	0.00	30.38	32.36	32.99
WI NonMSA Total 2012-2013	5,058	7.23	0.00	0.00	5.96	5.50	78.54	76.26	15.49	18.25	30.97	0.00	32.83	30.72	28.42
WI NonMSA Total 2014-2015	5,184	7.41	0.00	0.00	5.38	5.57	75.98	74.17	18.64	20.25	29.86	0.00	32.33	29.10	27.85

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Madison MSA 2012-2013	31	2.53	0.42	0.00	4.41	3.23	74.78	74.19	20.13	22.58	5.80	0.00	25.00	4.93	8.51
Madison MSA 2014-2015	92	7.50	0.33	2.17	4.22	5.43	72.02	75.00	23.23	17.39	12.58	0.00	40.00	10.67	20.45
Milwaukee-Waukesha-West Allis MSA	159	12.97	3.00	5.66	7.17	5.03	43.84	27.67	46.00	61.64	30.07	66.67	100.00	20.97	31.33
Limited Review:															
Appleton MSA	59	4.81	0.00	0.00	4.21	1.69	79.41	86.44	16.38	11.86	5.41	0.00	0.00	4.69	14.29
Eau Claire MSA	53	4.32	0.00	0.00	12.77	15.09	75.39	75.47	11.84	9.43	10.32	0.00	14.29	10.92	4.55
Fond du Lac MSA	34	2.77	0.00	0.00	2.57	0.00	87.50	82.35	9.93	17.65	6.25	0.00	50.00	4.48	9.09
Green Bay MSA	38	3.10	0.59	0.00	6.19	2.63	50.81	47.37	42.42	50.00	18.18	0.00	66.67	14.58	17.14
Janesville-Beloit MSA	23	1.88	1.10	0.00	4.86	0.00	70.22	65.22	23.82	34.78	0.61	0.00	0.00	0.76	0.00
LaCrosse-Onalaska MSA	16	1.31	0.00	0.00	3.31	0.00	83.15	56.25	13.54	43.75	17.14	0.00	0.00	11.11	50.00
Oshkosh-Neenah MSA	25	2.04	0.00	0.00	4.90	0.00	85.10	80.00	10.00	20.00	14.04	0.00	0.00	14.04	0.00
Racine MSA	45	3.67	0.65	0.00	3.25	0.00	50.87	60.00	45.24	40.00	24.32	0.00	0.00	26.09	21.43
Sheboygan MSA	39	3.18	0.00	0.00	11.36	7.69	85.35	82.05	3.28	10.26	6.02	0.00	0.00	6.85	0.00
Wausau MSA	94	7.67	0.00	0.00	11.22	9.57	79.83	85.11	8.95	5.32	23.20	0.00	14.29	23.68	25.00
WI NonMSA Total 2012-2013	162	13.21	0.00	0.00	3.32	6.17	80.02	84.57	16.66	9.26	8.60	0.00	19.23	8.87	5.26
WI NonMSA Total 2014-2015	356	29.04	0.00	0.00	3.18	2.25	77.68	82.30	19.14	15.45	13.90	0.00	17.24	13.72	11.23

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Madison MSA 2012-2013	658	7.12	18.37	7.55	17.96	19.80	24.91	29.53	38.76	43.12	3.35	1.39	2.13	3.55	4.54
Madison MSA 2014-2015	528	5.71	17.88	7.47	17.50	22.64	24.50	24.62	40.12	45.27	2.54	2.34	2.49	2.59	2.57
Milwaukee-Waukesha-West Allis MSA	3,399	36.76	22.15	16.23	16.90	25.86	20.61	18.67	40.35	39.23	2.79	6.01	3.05	1.88	2.52
Limited Review:															
Appleton MSA	371	4.01	16.54	9.88	19.20	21.60	26.18	31.48	38.07	37.04	2.31	1.52	1.49	3.02	2.86
Eau Claire MSA	320	3.46	19.00	11.11	19.12	27.96	23.80	29.03	38.08	31.90	4.64	5.53	4.92	5.63	3.23
Fond du Lac MSA	398	4.30	17.50	13.70	18.65	24.66	26.85	30.96	37.01	30.68	7.67	12.28	7.02	8.81	5.84
Green Bay MSA	552	5.97	18.40	10.67	17.86	23.72	23.26	30.43	40.49	35.18	3.34	3.08	2.38	3.73	3.80
Janesville-Beloit MSA	152	1.64	19.66	10.74	18.49	23.97	22.32	30.58	39.53	34.71	1.27	1.18	0.57	1.43	1.63
LaCrosse-Onalaska MSA	166	1.80	17.97	13.49	18.47	23.02	24.53	22.22	39.03	41.27	2.20	3.70	2.26	1.21	2.44
Oshkosh-Neenah MSA	434	4.69	18.03	9.61	18.42	30.13	25.56	28.83	37.99	31.43	3.92	4.04	4.32	4.38	3.15
Racine MSA	218	2.36	20.69	6.80	16.90	25.85	22.97	25.17	39.43	42.18	1.89	0.81	1.92	2.30	1.91
Sheboygan MSA	245	2.65	18.50	8.72	18.89	28.44	25.11	28.90	37.50	33.94	4.90	3.38	5.56	5.12	4.58
Wausau MSA	271	2.93	17.35	11.24	19.31	25.19	25.47	29.84	37.86	33.72	5.07	4.11	5.54	5.43	4.78
WI NonMSA Total 2012-2013	773	8.36	17.00	8.57	18.78	21.27	23.73	24.08	40.49	46.09	5.22	5.25	5.03	5.75	5.02
WI NonMSA Total 2014-2015	762	8.24	16.82	6.66	18.64	21.33	23.61	23.75	40.94	48.26	5.03	4.46	4.79	4.17	5.70

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Madison MSA 2012-2013	92	6.13	18.37	3.30	17.96	30.77	24.91	26.37	38.76	39.56	4.02	2.35	3.97	3.28	4.92
Madison MSA 2014-2015	64	4.27	17.88	11.29	17.50	17.74	24.50	30.65	40.12	40.32	4.62	5.48	3.11	4.26	5.61
Milwaukee-Waukesha-West Allis MSA	512	34.13	22.15	9.78	16.90	15.87	20.61	25.87	40.35	48.48	5.06	5.45	5.54	4.93	4.86
Limited Review:															
Appleton MSA	34	2.27	16.54	6.25	19.20	34.38	26.18	21.88	38.07	37.50	1.47	1.75	2.33	1.58	0.85
Eau Claire MSA	61	4.07	19.00	10.17	19.12	32.20	23.80	30.51	38.08	27.12	6.06	3.57	5.26	7.14	6.58
Fond du Lac MSA	68	4.53	17.50	7.35	18.65	16.18	26.85	30.88	37.01	45.59	5.43	5.88	5.13	4.76	5.88
Green Bay MSA	53	3.53	18.40	5.77	17.86	17.31	23.26	26.92	40.49	50.00	4.06	0.00	3.49	2.91	5.41
Janesville-Beloit MSA	16	1.07	19.66	14.29	18.49	35.71	22.32	28.57	39.53	21.43	0.49	0.00	0.00	1.67	0.00
LaCrosse-Onalaska MSA	18	1.20	17.97	5.56	18.47	27.78	24.53	16.67	39.03	50.00	0.82	0.00	2.60	0.89	0.00
Oshkosh-Neenah MSA	50	3.33	18.03	7.69	18.42	28.21	25.56	23.08	37.99	41.03	2.72	0.00	2.44	3.48	2.86
Racine MSA	30	2.00	20.69	16.67	16.90	26.67	22.97	30.00	39.43	26.67	4.26	4.17	3.03	6.67	3.49
Sheboygan MSA	68	4.53	18.50	15.15	18.89	25.76	25.11	21.21	37.50	37.88	4.48	2.17	4.44	4.00	5.52
Wausau MSA	54	3.60	17.35	11.11	19.31	24.07	25.47	25.93	37.86	38.89	2.99	3.70	4.84	4.85	1.14
WI NonMSA Total 2012-2013	212	14.13	17.00	14.49	18.78	22.71	23.73	22.22	40.49	40.58	7.63	10.16	9.09	6.16	7.32
WI NonMSA Total 2014-2015	168	11.20	16.82	13.75	18.64	28.13	23.61	21.88	40.94	36.25	7.52	16.67	9.96	6.30	5.44

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available..

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Madison MSA 2012-2013	1,636	8.80	18.37	6.67	17.96	16.99	24.91	25.35	38.76	50.98	4.14	3.36	3.29	3.61	5.14
Madison MSA 2014-2015	359	1.93	17.88	9.70	17.50	14.55	24.50	26.97	40.12	48.79	2.27	2.79	1.50	2.06	2.66
Milwaukee-Waukesha-West Allis MSA	7,042	37.89	22.15	6.82	16.90	15.43	20.61	23.23	40.35	54.51	3.90	5.32	3.95	3.43	3.93
Limited Review:															
Appleton MSA	657	3.54	16.54	7.17	19.20	22.03	26.18	27.62	38.07	43.18	1.62	0.26	1.71	2.14	1.54
Eau Claire MSA	421	2.27	19.00	7.11	19.12	14.21	23.80	26.05	38.08	52.63	4.77	3.11	3.68	4.90	5.71
Fond du Lac MSA	895	4.82	17.50	8.64	18.65	28.22	26.85	28.47	37.01	34.67	10.77	9.68	17.39	10.03	8.52
Green Bay MSA	1,174	6.32	18.40	6.79	17.86	18.76	23.26	26.95	40.49	47.50	2.87	1.02	3.01	2.51	3.37
Janesville-Beloit MSA	221	1.19	19.66	2.91	18.49	21.84	22.32	32.52	39.53	42.72	1.07	0.80	0.29	1.61	1.10
LaCrosse-Onalaska MSA	168	0.90	17.97	11.51	18.47	18.71	24.53	24.46	39.03	45.32	1.67	4.03	1.39	1.48	1.29
Oshkosh-Neenah MSA	633	3.41	18.03	8.62	18.42	20.73	25.56	23.67	37.99	46.97	2.78	2.30	1.70	2.54	3.69
Racine MSA	452	2.43	20.69	7.71	16.90	17.63	22.97	27.00	39.43	47.66	2.85	0.76	3.39	3.75	2.41
Sheboygan MSA	773	4.16	18.50	12.50	18.89	22.94	25.11	25.96	37.50	38.60	8.76	7.48	10.00	8.55	8.43
Wausau MSA	415	2.23	17.35	9.95	19.31	17.35	25.47	26.79	37.86	45.92	4.89	5.76	3.95	4.67	5.22
WI NonMSA Total 2012-2013	2,818	15.16	17.00	6.23	18.78	17.89	23.73	24.52	40.49	51.37	7.25	6.46	7.91	6.72	7.41
WI NonMSA Total 2014-2015	919	4.95	16.82	8.20	18.64	21.88	23.61	22.59	40.94	47.32	6.38	5.93	8.05	5.41	6.29

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF WISCONSIN									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Madison MSA 2012-2013	4,911	7.01	69.15	47.06	96.42	1.57	2.02	32.39	32.80
Madison MSA 2014-2015	4,779	6.83	77.37	52.88	96.55	1.30	2.16	25.77	27.16
Milwaukee-Waukesha-West Allis MSA	27,836	39.76	74.87	53.15	94.15	2.72	3.13	27.64	32.75
Limited Review:									
Appleton MSA	3,239	4.63	74.13	44.58	92.19	3.49	4.32	24.17	28.02
Eau Claire MSA	2,267	3.24	77.77	48.26	95.59	2.16	2.25	30.45	36.30
Fond du Lac MSA	1,283	1.83	74.22	50.04	96.34	1.56	2.10	23.41	25.32
Green Bay MSA	4,418	6.31	76.62	45.84	97.56	1.04	1.40	26.76	31.33
Janesville-Beloit MSA	1,357	1.94	77.98	55.78	98.75	0.66	0.59	22.82	27.48
LaCrosse-Onalaska MSA	1,216	1.74	72.33	37.75	96.88	1.23	1.89	22.88	20.00
Oshkosh-Neenah MSA	2,033	2.90	75.07	47.17	94.39	3.30	2.31	26.62	32.03
Racine MSA	2,361	3.37	79.68	56.84	94.92	3.18	1.91	22.87	28.01
Sheboygan MSA	1,457	2.08	75.40	44.82	95.20	2.26	2.54	26.33	24.08
Wausau MSA	2,610	3.73	76.88	49.43	96.32	1.69	1.99	32.87	40.83
WI NonMSA Total 2012-2013	5,058	7.22	75.68	50.38	96.40	1.96	1.64	30.97	33.43
WI NonMSA Total 2014-2015	5,184	7.40	78.85	54.94	96.60	1.74	1.66	29.86	34.23

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF WISCONSIN Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Madison MSA 2012-2013	31	2.53	97.60	61.29	100.00	0.00	0.00	5.80	6.72
Madison MSA 2014-2015	92	7.50	97.20	65.22	97.83	0.00	2.17	12.58	16.67
Milwaukee-Waukesha-West Allis MSA	159	12.97	95.15	70.44	98.11	1.89	0.00	30.07	51.61
Limited Review:									
Appleton MSA	59	4.81	97.04	61.02	100.00	0.00	0.00	5.41	6.59
Eau Claire MSA	53	4.32	98.87	64.15	98.11	1.89	0.00	10.32	15.38
Fond du Lac MSA	34	2.77	96.32	58.82	82.35	14.71	2.94	6.25	6.25
Green Bay MSA	38	3.10	97.05	60.53	100.00	0.00	0.00	18.18	21.88
Janesville-Beloit MSA	23	1.88	97.34	78.26	100.00	0.00	0.00	0.61	0.00
LaCrosse-Onalaska MSA	16	1.31	98.07	43.75	100.00	0.00	0.00	17.14	37.50
Oshkosh-Neenah MSA	25	2.04	98.57	40.00	100.00	0.00	0.00	14.04	20.00
Racine MSA	45	3.67	96.75	37.78	88.89	4.44	6.67	24.32	20.83
Sheboygan MSA	39	3.18	95.20	38.46	100.00	0.00	0.00	6.02	2.04
Wausau MSA	94	7.67	98.71	57.45	95.74	1.06	3.19	23.20	26.67
WI NonMSA Total 2012-2013	162	13.21	97.53	64.81	82.10	12.96	4.94	8.60	8.58
WI NonMSA Total 2014-2015	356	29.04	97.09	58.71	92.98	4.78	2.25	13.90	17.98

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF WISCONSIN Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Madison MSA 2012-2013	51	17,068	68	16,346	119	33,414	9.03	4	404
Madison MSA 2014-2015	25	4,023	41	16,032	66	20,055	5.42	0	0
Milwaukee-Waukesha-West Allis MSA	70	48,541	575	161,806	645	210,347	56.82	3	11
Limited Review:									
Appleton MSA	7	5,501	49	8,058	56	13,559	3.66	0	0
Eau Claire MSA	14	2,034	42	2,869	56	4,903	1.32	0	0
Fond du Lac MSA	9	756	44	1,943	53	2,699	0.73	0	0
Green Bay MSA	16	1,716	25	4,222	41	5,938	1.60	1	5,347
Janesville-Beloit MSA	5	204	12	301	17	505	0.14	0	0
LaCrosse-Onalaska MSA	10	2,068	25	2,532	35	4,600	1.24	0	0
Oshkosh-Neenah MSA	15	1,411	46	8,469	61	9,880	2.67	0	0
Racine MSA	8	650	61	9,894	69	10,544	2.85	0	0
Sheboygan MSA	9	1,257	38	2,364	47	3,621	0.98	0	0
Wausau MSA	11	800	58	8,672	69	9,472	2.56	0	0
WI NonMSA Total 2012-2013	91	14,132	81	5,041	172	19,173	5.18	1	18,048
WI NonMSA Total 2014-2015	83	14,576	73	4,477	156	19,053	5.15	0	0
Statewide:									
Qualified Investments That Serve AAs	5	1,400	16	1,067	21	2,467	0.67	0	0
Qualified Investments Outside AAs	10	8,563	39	43,504	49	52,067	NA	1	26

* 'Prior Period Investments' are investments made in a previous evaluation period that are outstanding as of 12/31/13 or 12/31/15 as applicable for the assessment area.

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF WISCONSIN																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Madison MSA 2012-2013	2.74	12	NA	8.33	25.00	50.00	16.67	0	0	0	0	0	0	6.23	14.99	57.05	21.15
Madison MSA 2014-2015	2.74	12	9.76	8.33	25.00	41.67	25.00	0	0	0	0	0	0	5.72	12.83	57.40	23.47
Milwaukee-Waukesha-West Allis MSA	86.49	53	43.09	7.55	13.21	37.74	41.51	7	0	0	2	2	3	14.65	16.20	36.13	33.02
Limited Review:																	
Appleton MSA	0.48	3	2.44	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	7.03	74.98	17.99
Eau Claire MSA	0.80	6	4.88	0.00	33.33	33.33	33.33	1	0	0	0	0	1	0.00	12.22	71.26	16.52
Fond du Lac MSA	0.52	3	2.44	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	12.31	79.11	8.58
Green Bay MSA	0.64	3	2.44	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.78	19.40	49.56	28.82
Janesville-Beloit MSA	0.07	1	0.81	0.00	100.00	0.00	0.00	0	0	0	0	0	0	7.98	17.27	51.83	22.92
LaCrosse-Onalaska MSA	0.67	2	1.63	0.00	50.00	50.00	0.00	0	0	0	0	0	0	4.80	13.86	64.64	16.71
Oshkosh-Neenah MSA	0.63	3	2.44	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	16.29	67.13	16.58
Racine MSA	0.39	3	2.44	0.00	33.33	66.67	0.00	0	0	0	0	0	0	4.70	14.33	53.49	27.48
Sheboygan MSA	0.62	2	1.63	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	23.36	69.54	7.10
Wausau MSA	0.50	5	4.07	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	16.46	72.62	10.91
WI NonMSA Total 2012-2013	1.36	27	NA	0.00	7.41	85.19	7.41	0	0	0	0	0	0	0.00	6.36	76.36	17.28
WI NonMSA Total 2014-2015	1.36	27	21.95	0.00	7.41	81.48	11.11	0	0	0	0	0	0	0.00	5.92	74.46	19.62

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF WISCONSIN																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Madison MSA 2012-2013	2.74	12	NA	8.33	25.00	50.00	16.67	19	NA	5.26	21.05	57.89	15.79	6.23	14.99	57.05	21.15
Madison MSA 2014-2015	2.74	12	9.76	8.33	25.00	41.67	25.00	19	9.22	5.26	21.05	57.89	15.79	5.72	12.83	57.40	23.47
Milwaukee-Waukesha-West Allis MSA	86.49	53	43.09	7.55	13.21	37.74	41.51	93	45.15	8.60	15.05	35.48	40.86	14.65	16.20	36.13	33.02
Limited Review:																	
Appleton MSA	0.48	3	2.44	0.00	33.33	66.67	0.00	4	1.94	0.00	25.00	75.00	0.00	0.00	7.03	74.98	17.99
Eau Claire MSA	0.80	6	4.88	0.00	33.33	33.33	33.33	18	8.74	0.00	16.67	66.67	16.67	0.00	12.22	71.26	16.52
Fond du Lac MSA	0.52	3	2.44	0.00	33.33	66.67	0.00	4	1.94	0.00	50.00	50.00	0.00	0.00	12.31	79.11	8.58
Green Bay MSA	0.64	3	2.44	0.00	0.00	100.00	0.00	5	2.43	0.00	0.00	80.00	20.00	1.78	19.40	49.56	28.82
Janesville-Beloit MSA	0.07	1	0.81	0.00	100.00	0.00	0.00	1	0.49	0.00	100.00	0.00	0.00	7.98	17.27	51.83	22.92
LaCrosse-Onalaska MSA	0.67	2	1.63	0.00	50.00	50.00	0.00	4	1.94	0.00	50.00	50.00	0.00	4.80	13.86	64.64	16.71
Oshkosh-Neenah MSA	0.63	3	2.44	0.00	33.33	66.67	0.00	5	2.43	0.00	20.00	80.00	0.00	0.00	16.29	67.13	16.58
Racine MSA	0.39	3	2.44	0.00	33.33	66.67	0.00	3	1.46	0.00	33.33	66.67	0.00	4.70	14.33	53.49	27.48
Sheboygan MSA	0.62	2	1.63	0.00	100.00	0.00	0.00	2	0.97	0.00	100.00	0.00	0.00	0.00	23.36	69.54	7.10
Wausau MSA	0.50	5	4.07	0.00	20.00	60.00	20.00	6	2.91	0.00	33.33	50.00	16.67	0.00	16.46	72.62	10.91
WI NonMSA Total 2012-2013	1.36	27	NA	0.00	7.41	85.19	7.41	53	NA	0.00	7.55	88.68	3.77	0.00	6.36	76.36	17.28
WI NonMSA Total 2014-2015	1.36	27	21.95	0.00	7.41	81.48	11.11	42	20.39	0.00	9.52	80.95	9.52	0.00	5.92	74.46	19.62

Table 1. Lending Volume

LENDING VOLUME												
Geography: STATE OF WYOMING												
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$(000's)	
Full Review:												
Cheyenne MSA	22.37	1,043	198,302	534	21,299	11	118	8	2,749	1,596	222,468	21.69
Limited Review:												
Casper MSA	17.40	558	102,047	677	9,195	6	50	0	0	1,241	111,292	12.68
WY NonMSA Total	60.23	2,348	523,506	1,904	84,124	42	1,425	2	444	4,296	609,499	65.63
Statewide:												
CD Loans That Serve AAs	0.00	NA	NA	NA	NA	NA	NA	0	0	0	0	NA
CD Loans Outside AAs	NA	NA	NA	NA	NA	NA	NA	0	0	NA	NA	NA

* Loan data is for the entire evaluation period. Rated area refers to either state or multistate MA rating area.
** The evaluation period for Community Development Loans is from April 1, 2012 to December 31, 2015.
*** Deposit data as of June 30, 2015. Rated area refers to the state, multistate MA, or institution, as appropriate.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE Geography: STATE OF WYOMING Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans[1]		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:															
Cheyenne MSA	580	30.61	0.00	0.00	26.87	18.45	47.27	60.86	25.86	20.69	7.20	0.00	8.01	8.11	3.95
Limited Review:															
Casper MSA	337	17.78	0.00	0.00	16.06	15.73	55.44	55.19	28.51	29.08	7.21	0.00	10.80	6.62	6.63
WY NonMSA Total	978	51.61	0.01	0.00	16.15	7.57	62.22	51.33	21.62	41.10	6.28	0.00	3.69	5.68	8.67

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT Geography: STATE OF WYOMING Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cheyenne MSA	25	10.59	0.00	0.00	26.87	8.00	47.27	52.00	25.86	40.00	3.79	0.00	0.00	3.77	6.25
Limited Review:															
Casper MSA	35	14.83	0.00	0.00	16.06	2.86	55.44	57.14	28.51	40.00	10.81	0.00	4.55	11.11	13.33
WY NonMSA Total	176	74.58	0.01	0.00	16.15	13.07	62.22	56.82	21.62	30.11	10.58	0.00	10.39	9.09	15.71

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF WYOMING															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cheyenne MSA	438	24.16	0.00	0.00	26.87	15.98	47.27	53.65	25.86	30.37	3.09	0.00	1.67	3.46	3.31
Limited Review:															
Casper MSA	186	10.26	0.00	0.00	16.06	7.53	55.44	55.38	28.51	37.10	3.24	0.00	0.99	3.93	2.55
WY NonMSA Total	1,189	65.58	0.01	0.00	16.15	11.19	62.22	52.90	21.62	35.91	6.64	0.00	5.56	5.95	8.04

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2010 Census information.

Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY Geography: STATE OF WYOMING Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Multifamily Loans [1]		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:															
Cheyenne MSA	0	0.00	0.00	0.00	41.61	0.00	38.48	0.00	19.91	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Casper MSA	0	0.00	0.00	0.00	22.98	0.00	40.56	0.00	36.46	0.00	0.00	0.00	0.00	0.00	0.00
WY NonMSA Total	5	100.00	1.60	0.00	16.73	20.00	55.80	60.00	25.87	20.00	6.45	0.00	0.00	5.88	14.29

[1] Multifamily loan distribution includes home purchase, home improvement, and refinance loans.
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.
*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by the number of multifamily housing units in the area based on 2010 Census information.

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES															
Geography: STATE OF WYOMING															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Busi-nesses***	% BANK Loans	% of Busi-nesses***	% BANK Loans	% of Busi-nesses***	% BANK Loans	% of Busi-nesses***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	532	17.09	0.00	0.00	45.12	52.82	30.59	24.44	23.67	22.74	7.56	0.00	5.76	8.26	11.40
Limited Review:															
Casper MSA	677	21.75	0.00	0.00	28.47	23.34	46.78	43.72	24.75	32.94	11.07	0.00	8.12	11.70	10.49
WY NonMSA Total	1,904	61.16	0.62	0.21	17.73	18.07	61.73	58.40	19.93	23.32	7.86	0.00	7.07	7.59	8.00

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS															
Geography: STATE OF WYOMING															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cheyenne MSA	11	18.64	0.00	0.00	14.85	18.18	57.43	81.82	27.72	0.00	8.70	0.00	40.00	8.33	0.00
Limited Review:															
Casper MSA	6	10.17	0.00	0.00	16.59	0.00	42.18	16.67	41.23	83.33	4.41	0.00	0.00	0.00	4.92
WY NonMSA Total	42	71.19	0.14	4.76	20.22	16.67	64.99	69.05	14.65	9.52	1.78	0.00	1.25	2.17	1.64

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.
** 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 (2015), with Dun and Bradstreet (2013) used for the 2012-2013 assessment areas.

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE Geography: STATE OF WYOMING Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Purchase Loans [1]		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:															
Cheyenne MSA	580	30.61	18.47	7.14	19.06	23.21	23.89	25.00	38.58	44.64	1.77	0.00	2.06	1.77	1.92
Limited Review:															
Casper MSA	337	17.78	18.63	1.15	19.32	22.99	20.70	21.84	41.36	54.02	2.28	0.61	2.35	1.60	3.28
WY NonMSA Total	978	51.61	19.03	7.41	17.91	20.60	22.00	31.71	41.06	40.28	2.81	1.71	3.03	2.75	2.89

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT Geography: STATE OF WYOMING Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Improvement Loans [1]		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:															
Cheyenne MSA	25	10.59	18.47	9.52	19.06	19.05	23.89	28.57	38.58	42.86	4.17	7.14	2.33	3.92	4.76
Limited Review:															
Casper MSA	35	14.83	18.63	10.00	19.32	23.33	20.70	20.00	41.36	46.67	10.14	23.08	7.41	6.45	10.45
WY NonMSA Total	176	74.58	19.03	6.75	17.91	20.25	22.00	25.15	41.06	47.85	11.08	3.70	8.93	9.80	14.09

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).
* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.
** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.
*** Percentage of Families is based on the 2010 Census information.
**** As a percentage of loans with borrower income information available.

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE															
Geography: STATE OF WYOMING															
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015															
MA/Assessment Area:	Total Home Mortgage Refinance Loans [1]		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:															
Cheyenne MSA	438	24.16	18.47	6.03	19.06	11.21	23.89	30.17	38.58	52.59	3.08	2.80	1.26	3.40	3.79
Limited Review:															
Casper MSA	186	10.26	18.63	5.79	19.32	20.66	20.70	19.01	41.36	54.55	3.10	0.00	5.76	1.62	3.05
WY NonMSA Total	1,189	65.58	19.03	6.54	17.91	16.88	22.00	31.94	41.06	44.63	5.36	5.10	5.45	7.06	4.43

[1] Data shown includes only one to four-family and manufactured housing (property type of 1 or 2).

* Based on 2015 Peer Mortgage Data (USPR), with 2013 Peer Mortgage Data (USPR) used for the 2012-2013 assessment areas.

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

*** Percentage of Families is based on the 2010 Census information.

**** As a percentage of loans with borrower income information available.

Table 11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES									
Geography: STATE OF WYOMING									
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cheyenne MSA	534	17.14	75.47	56.18	93.45	2.06	4.49	7.56	8.48
Limited Review:									
Casper MSA	677	21.73	75.23	47.56	97.93	1.62	0.44	11.07	9.95
WY NonMSA Total	1,904	61.12	75.72	54.73	92.12	2.47	5.41	7.86	7.81

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS Geography: STATE OF WYOMING Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$1 Million or Less
Full Review:									
Cheyenne MSA	11	18.64	97.03	72.73	100.00	0.00	0.00	8.70	11.43
Limited Review:									
Casper MSA	6	10.17	98.10	50.00	100.00	0.00	0.00	4.41	1.69
WY NonMSA Total	42	71.19	97.76	78.57	92.86	4.76	2.38	1.78	1.72

* Based on 2015 Peer Small Business Data (US and PR), with 2013 Peer Small Business Data (US and PR) used for the 2012-2013 assessment areas.

** 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 Dun and Bradstreet - 2015, with 2013 data used for the 2012-2013 assessment areas).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms.

Institution ID: USBNA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS Geography: STATE OF WYOMING Evaluation Period: APRIL 1, 2012 to DECEMBER 31, 2015									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments**		Total Investments			Unfunded Commitments***	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
Cheyenne MSA	11	2,480	24	1,232	35	3,712	39.51	0	0
Limited Review:									
Casper MSA	4	317	9	551	13	868	9.24	0	0
WY NonMSA Total	19	2,142	61	2,647	80	4,789	50.97	0	0
Statewide:									
Qualified Investments That Serve AAs	0	0	4	27	4	27	0.29	0	0
Qualified Investments Outside AAs	0	0	0	0	0	0	NA	0	0

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

** The evaluation period for current period investments is April 1, 2012 to December 31, 2015.

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: STATE OF WYOMING																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
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:																	
Cheyenne MSA	21.69	2	13.33	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	28.98	49.89	21.13
Limited Review:																	
Casper MSA	12.68	1	6.67	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	17.48	54.75	27.76
WY NonMSA Total	65.63	12	80.00	0.00	33.33	50.00	16.67	0	0	0	0	0	0	0.98	16.63	60.30	22.09

Institution ID: USBNA

Distribution of Branch and ATM Delivery System

DISTRIBUTION OF BRANCH AND ATM DELIVERY SYSTEM																	
Geography: STATE OF WYOMING																	
Evaluation Period: JANUARY 1, 2012 to DECEMBER 31, 2015																	
MA/Assessment Area:	Deposits	Branches						ATMs						Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				#of Bank ATMs	% of Rated Area ATMs in AA	Location of ATMs by Income of Geographies				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Cheyenne MSA	21.69	2	13.33	0.00	50.00	0.00	50.00	2	11.11	0.00	50.00	0.00	50.00	0.00	28.98	49.89	21.13
Limited Review:																	
Casper MSA	12.68	1	6.67	0.00	100.00	0.00	0.00	1	5.56	0.00	100.00	0.00	0.00	0.00	17.48	54.75	27.76
WY NonMSA Total	65.63	12	80.00	0.00	33.33	50.00	16.67	15	83.33	0.00	33.33	53.33	13.33	0.98	16.63	60.30	22.09