



# LARGE BANK

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Comptroller of the Currency  
Administrator of National Banks

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Washington, DC 20219

## PUBLIC DISCLOSURE

**Evaluation Period:**  
**January 1, 2007 - December 31, 2010**

## COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

JPMorgan Chase Bank, N.A.  
Charter Number: 8

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Columbus, OH 43240

Office of the Comptroller of the Currency

Large Bank Supervision  
250 E Street, SW, Mail Stop 6-1  
Washington, DC 20219-0001

**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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## General Information and Overall CRA Rating

### General Information

The Community Reinvestment Act (CRA) requires each federal financial supervisory agency to use its authority, when examining financial institutions subject to its supervision, to assess the institution’s record of meeting the credit needs of its entire community, including low- and moderate-income (LMI) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution’s record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of JPMorgan Chase Bank, N.A. issued by the OCC, the institution’s supervisory agency, for the evaluation period starting January 1, 2007 through December 31, 2010. The agency evaluates performance in assessment areas (AAs), as they are delineated by the institution, rather than individual branches. This AA evaluation may include visits to some, but not necessarily all of the institution’s branches. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

### Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated **“Satisfactory.”**

The following table indicates the performance level of **JPMorgan Chase Bank, N.A.** with respect to the lending, investment, and service tests:

Performance Levels	JPMorgan Chase Bank, N.A. Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding		X	
High Satisfactory	X		X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

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

The major factors that support the “Satisfactory” rating include:

Chase’s lending performance is good.

The volume of community development loans and the responsiveness of these loans to identified needs in the bank’s AAs were driving factors in elevating the bank’s otherwise adequate lending performance to a good level.

- The bank demonstrated generally good lending performance in all rating areas. The strength of community development lending elevated the lending test rating in a majority of

the rating areas to a good or an excellent level.

- In total, Chase made over \$9.6 billion in community development loans within its various AAs and broader regional areas that include its AAs. This figure for the bank as a whole is informational only, as conclusions and ratings in this evaluation are based on the bank's performance in the individual AAs and rating areas. Most (68%) of the community development loans made by the bank provided needed affordable housing. Another 19% of community development loans provided social services that assisted low- and moderate-income individuals and 13% helped to revitalize or stabilize low- or moderate-income geographies or provided economic development.
- In addition, the bank made 36 community development loans totaling over \$58 million to national funds, projects, and organizations. These loans could not be attributed to a specific AA; however, the recipient organizations develop projects and provide services within the bank's AAs and broader regional areas. These loans demonstrate a positive commitment to community development efforts throughout the nation. Please refer to Table 1 Lending Volume Broader Regional Area in appendix D for facts and data regarding these loans.
- In relation to the bank's deposit market share, lending activity levels supported the bank's overall good lending test performance. Most of the rating areas, including most of the primary areas, had excellent lending activity. Given the weakness in the economy for approximately the last half of the evaluation period and the level of competition from national lenders for the diminishing number of HMDA and small business loans, the bank's volume of loans is generally excellent compared with their deposit market share in these communities. The volume of loans originated is reflective of the bank's resources and capacity during the examination period.
- Most notably in the primary rating areas, the distribution of loans to geographies of different income levels is generally good while the distribution of loans to borrowers of different income levels is considered generally adequate.

Chase's overall investment performance is excellent.

The bank demonstrated generally good investment performance in the rating areas. The bank's overall investment performance was elevated to an excellent level as a result of the significant volume of investments in broader statewide and regional areas. The volume of investments in broader statewide and regional areas represents a significant commitment by the bank to address the community development needs of the bank's AAs. Many of the broader statewide and regional area investments have the potential to benefit the bank's AAs. These investments helped to elevate the investment test rating for several of the rating areas. The bank also invested a significant volume in broader statewide and regional areas with limited potential to benefit the bank's AAs. Since the bank's performance in the rating areas was considered to be at least adequate, we also considered the impact of these investments in broader statewide and regional areas whether or not they had the potential to benefit the bank's AAs. These additional investments helped to elevate the bank's overall performance to an excellent level.

Excellent or good performance is evident through the volume of qualified investments and grants made during the evaluation period, and the remaining value of investments originated in prior periods. The volume of legally-binding, unfunded commitments to Low-Income Housing Tax Credit partnerships or funds elevated the investment test rating in several of the bank's rating areas.

- In total, Chase made over \$7.7 billion in community development investments and grants in the current and prior periods. While the current evaluation period is approximately one year longer than the prior evaluation period, the total dollars invested which were considered in this evaluation is nearly double the amount considered for the prior evaluation. Within its various AAs and broader statewide and regional areas with the potential to benefit its AAs, the total invested or outstanding was over \$7.1 billion. Over \$5 billion was originated in the current evaluation period and over \$1.7 billion was originated in prior periods and remains outstanding. These figures for the bank as a whole are informational only, as conclusions and ratings in this evaluation are primarily based on the bank's performance in the individual AAs and rating areas. For prior period investments, the current book value is the amount considered in our evaluation.
- Two of the bank's five Primary Rating Areas were rated Outstanding under the investment test and three of the areas were rated High Satisfactory. As noted above, several of the ratings were elevated as a result of considering the significant volume of broader statewide and regional area investments. In addition, the volume of unfunded commitments to affordable housing programs helped to elevate the rating for several rating areas.
- Of the 29 rating areas, 23 exhibited excellent performance and 6 exhibited good performance. As noted above, several of these ratings were elevated as a result of considering the significant volume of broader statewide and regional area investments. In addition, the volume of unfunded commitments to affordable housing programs helped to elevate the rating for several rating areas.
- The bank and its affiliates responded to affordable housing needs primarily through investments in Low-Income Housing Tax Credit (LIHTC) partnerships or funds investments or acting as an equity placement agent for other investors into the LIHTC market. The bank is a consistent, and frequently the top, investor in the LIHTC market in the nation. With these investments, the bank demonstrated excellent responsiveness to the identified community development needs of its communities, through investment vehicles that promote affordable housing for low- and moderate-income individuals.
- Notably, the U.S. Department of the Treasury's Community Development Financial Institutions Fund (CDFI Fund) awarded Chase \$500,000 for serving economically distressed communities across the nation. The bank was recognized in 2011 by the U.S. Department of the Treasury by receiving the Bank Enterprise Award, which supports FDIC-insured financial institutions that are dedicated to financing and supporting community and economic development activities.

Chase's overall service performance is good.

- The distribution of branches provides generally good accessibility to geographies and individuals of different income levels in the bank's AAs.
- Chase's record of opening and closing branch offices has improved the accessibility of its delivery systems, especially in moderate-income geographies. On a net basis, the bank opened over 400 branches during the evaluation period, with over 30 of those in low- or moderate-income geographies.
- Branch hours are reasonably consistent across the AAs and any differences were reasonably explained. Overall hours do not vary in a way that inconveniences portions of the AAs, particularly low- and moderate-income geographies.
- The bank's level of community development services provided is good overall. Chase provides financial services education in LMI area branches to homebuyers and homeowners trying to preserve their homes and in LMI area schools. The bank maintains a significant number of ongoing relationships with organizations that work on affordable housing, education initiatives, small business development, and other community development goals.

## Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

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

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

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

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

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

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

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

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

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

**Full Review:** Performance under the lending, investment, and service tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

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

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

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

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

**Limited Review:** Performance under the lending, investment, and service tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).



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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report and the TFR. 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 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

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

## Description of Institution

JPMorgan Chase Bank, National Association (Chase or JPMCB) is a national bank with its main office in Columbus, Ohio and headquarters in New York, New York. Chase is the lead banking subsidiary of JPMorgan Chase & Company (JPMCC), a global financial holding company also headquartered in New York, New York. JPMCC is a global leader in investment banking, financial services for consumers, small business and commercial banking, financial transaction processing, asset management, and private equity products and services. At December 31, 2010, JPMCC held over \$2.1 trillion in total assets making it the nation's second largest bank holding company. JPMCC provides financial services to millions of consumers and businesses in the United States under the JPMorgan and Chase brands as well as prominent corporate, institutional and government clients in 60 countries globally.

Chase is an interstate commercial bank with over \$1.6 trillion in total assets and Tier 1 capital of \$92 billion at December 31, 2010. The bank provides a full suite of consumer and commercial banking services across 23 states through a branch network of over 5,200 branches and 15 thousand ATMs. Lending products include commercial and small business loans, consumer loans, and residential real estate loans, Small Business Administration (SBA) guaranteed loans, and other specialized lending programs. Deposit products include business and personal checking, money market, savings, time deposit, and individual retirement accounts. Chase retail products and services are also available through call centers and mobile or internet access on a 24 hours basis.

The bank's geographic footprint is in 23 U.S. states, including: Arizona, California, Colorado, Connecticut, Florida, Georgia, Idaho, Illinois, Indiana, Kentucky, Louisiana, Michigan, Nevada, New Jersey, New York, Ohio, Oklahoma, Oregon, Texas, Utah, Washington, West Virginia, and Wisconsin. Within its U.S. footprint, the bank has delineated nearly 200 AAs (including combined non-metropolitan areas). These AAs include six multistate metropolitan statistical areas (MMSAs), where the bank operates in at least two states.

This evaluation included a full-scope assessment of 33 selected AAs. Performance in the remaining AAs was considered in developing State or MMSA ratings. For states with AAs in non-metropolitan areas, the analysis is based on the combined non-metropolitan areas within each state.

The bank's net loans comprise 33% of total assets. Loans are distributed as follows: residential real estate 44%, consumer 14%, commercial 12%, foreign office loans and leases 11%, commercial real estate 10%, other loans 7%, and credit card 3%. Total deposits at year-end 2010 were \$1,020 billion, including deposits held in foreign branches of \$346.5 billion, or 34% of total deposits. Foreign deposits are not FDIC-insured and are held in non-U.S. branches. The impact of foreign deposits on the bank's lending and investment capacity was considered in the analysis of community development loans and investments.

Significant merger and acquisition activity during the evaluation period included: March 2008, JPMCC acquired The Bear Stearns Companies, Inc, strengthening capabilities across a broad range of businesses, and increasing holding company assets. In September 2008, JPMCC purchased from the FDIC certain deposits, assets and select liabilities of the former Washington Mutual Savings Bank (WaMu) which were folded into the bank. Through this

WaMu transaction, JPMCB expanded service into six new states, added 78 new AAs and recognized overlap in 29 existing AAs. As part of the agreement with the FDIC, the bank did not acquire all of the branches from WaMu; those not acquired by the bank were primarily closed by the FDIC. However, the bank acquired and renovated over 1,900 branches as a result of the transaction.

The examination evaluation period of January 1, 2007 through December 31, 2010, included a period of considerable economic volatility, triggered by a liquidity crisis in the United States banking system. This resulted in the bailout of many banks by the federal government and downturns in stock markets around the world. Chase received funds from the federal government in 2008 under the Troubled Asset Relief Program, which it has since repaid. Throughout the United States, the housing market suffered, resulting in an increase in foreclosures, evictions, and prolonged vacancies. This time period has been described as the worst economic and financial crisis since the Great Depression and resulted in tremendous declines in consumer wealth, substantial financial commitments by governments, and a significant decline in economic activity. This economic environment is a significant performance context factor for this and other banks.

Bank subsidiaries include trust operations, property management companies, and leasing companies. The bank also operates through affiliates and joint ventures. Chase requested that the activities, loans, and services of certain affiliates, subsidiaries, and joint ventures be considered in this evaluation. Applicable loans originated by these parties within Chase AAs are included in our review. Chase requested consideration for grants made by its affiliated JPMorgan Chase Foundation. Please see appendix A: Scope of Evaluation, for detail on the affiliates, subsidiaries and joint ventures and their products reviewed for each entity.

JPMCC's other bank subsidiaries include J. P. Morgan Trust Company, N.A., which is not subject to CRA, and Chase Bank USA, N.A. (CBUSA, NA), a credit card issuing bank which has a separate CRA evaluation under its national charter. JPMCC's principal nonbank subsidiary is J.P. Morgan Securities LLC, the domestic investment banking firm. JPMCC and the bank have numerous other significant affiliates that deal with venture capital, asset management, insurance and other financial services. JPMCC operates domestically and globally through subsidiaries, affiliates, joint ventures, representative offices, international branches, and subsidiary foreign banks.

JPMCB has no subsidiaries which negatively impact the bank's capacity to lend or invest in its communities. Neither the bank nor any of its affiliates were constrained by legal or financial impediments that would hamper its ability to help meet the credit needs of its communities during the assessment period. Furthermore, the economic crisis did not negatively impact JPMCB's compliance with the CRA.

JPMCC's business strategy is to provide an extensive range of financial services in the United States and globally. The organizational structure contains six business segments categorized as follows: Retail Financial Services, Commercial Banking, Asset and Wealth Management, Treasury and Securities Services, Investment Bank, and Card Services.

In 2011, federal banking regulators identified certain deficiencies and unsafe and unsound practices in JPMCB residential mortgage servicing and the handling of foreclosure proceedings from 2008 through 2010. Although the bank neither admits nor denies the OCC

findings, management signed a Consent Order on April 13, 2011 agreeing to comply with specific requirements of the document. This was part of formal criticism, censure, and financial penalties imposed by the regulators. The bank is implementing procedures to remediate the issues addressed in the Consent Order.

Also in 2011, the U.S. Department of the Treasury and the U.S. Department of Housing and Urban Development withheld incentive payments from Chase for its service in the Making Home Affordable Program for three consecutive quarters.

“JPMorgan Chase, NA was found to be in need of substantial improvement under the program. While JPMorgan Chase demonstrated some progress in areas reported for the third quarter, the servicer has a number of outstanding items from previous quarters that have not yet been addressed and play a critical part in their broader execution of the program. For these reasons, Treasury will withhold servicer incentives from JPMorgan Chase for the third consecutive quarter and will permanently reduce incentives owed to JPMorgan Chase unless the outstanding items are addressed before the next assessment.” (U.S. Department of Housing and Urban Development “Housing Scorecard” Servicer Assessments)

In the February 2012 Housing Scorecard, JPMorgan Chase was found to have “demonstrated marked progress in remedying a number of outstanding issues from previous quarters.” As a result, the U.S. Department of the Treasury agreed to release previously withheld incentive payments.

Subsequent to the evaluation period covered by the examination, bank management informed us of actions in which the bank implemented a monthly service fee waiver for all accounts that receive a combination of monthly direct deposits under the Social Security, Social Security Disability Insurance, and / or Supplemental Security Income programs. Although this was not considered for this evaluation, we acknowledge management’s actions in this regard and will consider the impact of this action as part of the next CRA evaluation.

This is the bank’s second CRA examination since it converted to a national charter in 2005. Chase received an “Outstanding” rating in its previous CRA examination, for the evaluation period ending December 31, 2006 in a Performance Evaluation dated January 1, 2007.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

Due to the corporate activity of the bank and its affiliates, the evaluation periods covered by this evaluation vary by rating area (state or multistate MSA). Unless otherwise noted within, the time period reviewed for the evaluation for all products was from 01/01/2007 through 12/31/2010. The applicable time period reviewed was from 09/26/2008 through 12/31/2010 for the following rating areas: California, Georgia, Idaho, Nevada, Oregon, Washington, the Portland-Vancouver-Hillsboro, OR-WA multistate MSA, parts of Florida and of Utah. The reason for the different time periods is due to the fact that the bank acquired certain assets and liabilities of the former WaMu from the FDIC in September 2008. If the evaluation period is different than 01/01/2007 through 12/31/2010, it will be noted on the Tables.

### Data Integrity

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

### Selection of Areas for Full-Scope Review

In each state and MMSA where the bank has an office, a sample of AAs within that state/MMSA area was selected for full-scope reviews. The area selected was typically the MSA or MD that contained the largest percentage of bank deposits within the rating area. The AAs selected for full-scope reviews represent over 60% of the bank's deposits. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how the areas were selected. In addition, each MMSA without underlying MDs in which the bank has branches in more than one state received a full-scope review as required by regulation.

### Ratings

The bank's overall rating is a blend of the MMSA ratings and state ratings. Five primary rating areas carried the greatest weight in our conclusions due to these areas representing the bank's most significant markets in terms of deposit concentrations. In order of significance, these areas were the New York-Northern New Jersey-Long Island, NY-NJ-PA multistate MSA with the New York-White Plains-Wayne, NY-NJ MD having the greatest influence over the rating for the area; the state of California with the Los Angeles-Long Beach-Glendale, CA MD, the Oakland-Fremont-Hayward MD, and the San Diego-Carlsbad-San Marcos MSA having the most influence over the state rating; the state of Texas represented by the Houston-Sugar Land-Baytown MSA as the largest MSA in the state; the Chicago-Joliet-Naperville, IL-IN-WI MSA; and the state of Michigan with the Detroit-Livonia-Dearborn MD having the greatest influence. These five rating areas account for 76% of the bank's total deposits.

The multistate metropolitan area ratings and state ratings are based primarily on those areas that received full-scope reviews, but the bank's performance in areas receiving limited-scope reviews is also considered. Refer to the "Scope" section under each state and Multistate Metropolitan Area Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## Community Contacts

OCC Community Affairs Officers updated or completed contacts in full-scope AAs for this evaluation. Interviews were conducted with a variety of community organizations including low-income housing specialists, small business development centers, social service groups, and community action groups. We also reviewed existing contacts made during the evaluation period with community groups, local government leaders, realtors, or business leaders within the various AAs.

## Other Information

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

*Inside/Outside Ratio* – We considered the volume of loans made inside the bank's AAs a positive factor in our evaluation of lending performance. Chase originated a majority of HMDA and small business loans inside its defined AAs. At the bank level by product, 58% of HMDA loans and 80% of small business loans were originated inside the bank's AAs. The volume of home purchase, home improvement and home refinance loans in the bank's defined AAs is consistent with the overall HMDA percentage, 55%, 64%, and 59%, respectively. We analyzed home mortgage and small business lending patterns using maps and other reports and found no unexplained conspicuous gaps.

*Flexible Loan Programs* - Chase's use of flexible loan programs positively impacted its lending test performance. The bank offers several nationwide loan programs that support affordable housing and small business lending. During the evaluation period, JPMCB made over 374,000 of these types of loans. Some examples of these loan programs include:

- DreaMaker Suite is the JPMCB's set of affordable mortgage loan products. These loans are available as a fixed or adjustable-rate loan and offer up to a 100% loan-to-value ratio, provide for a lower mortgage insurance premium than the standard premium, have expanded debt-to-income ratios, and allow for non-traditional/alternative sources of credit history such as timely rent or utility bill payments. Chase originated over 10,000 loans under this program in the AAs during the evaluation period.
- The bank makes available a mortgage subsidy/discount program to qualified low- or moderate-income homebuyers or persons purchasing a home in low- or moderate-income census tracts. For loans originated prior to 2009, there was a \$3,000 maximum subsidy per loan. This subsidy was reduced to \$1,500 in 2009. The borrower can use the subsidy for closing costs, interest rate buy downs, private mortgage insurance, or

down-payment assistance. During the evaluation period, the bank originated 13,988 home loans under this program.

- The bank offers a mortgage credit certificate program to low- and moderate-income families to assist in the purchase of single-family housing units. Congress authorized this program as part of the 1984 Tax Reform Act. The program provides low-income tax credits that reduce the amount of federal income taxes otherwise due from the borrower. Borrowers in this program may consider adjusting their federal income tax withholdings to benefit monthly from the mortgage credit certificate. Chase offers this program in its California, Illinois, and Texas rating areas.
- Through state and local housing finance agencies mortgage revenue bond programs, the bank originated 1,730 mortgage loans. Mortgages associated with these programs feature flexible qualifying ratios, income and purchase price limits specific to low- and moderate-income buyers, and possibly, down payment assistance grants.
- Chase made a total of over 340,000 FHA loans, U.S. Department of Veterans Affairs (VA) loans, and U.S. Department of Agriculture Rural Housing Services loans, and over 18,000 Small Business Administration (SBA) loans. The bank was consistently ranked as a top SBA lender throughout the evaluation period.
- In 2010, Chase launched its Loans for Hire program that rewarded business borrowers with a 0.5% interest rate discount for up to three new hires. Under this program, more than 750 businesses received discounts, hiring more than 1,765 employees in 18 states. The average discount was 1.17%. Also, the bank instituted a second review process to give business owners an additional opportunity for obtaining credit.

In addition to nationwide programs, the Bank offered flexible loan programs specific to certain rating areas. These programs were considered, as appropriate, however; as the Bank could not provide information on the volumes of loans originated, primary consideration was given to the national programs.

#### *Description of factors considered in our analysis under each performance test*

##### Lending Test

For the various loan products considered under the lending test, we gave greater weight to home refinance loans, less weight to home purchase loans and small business loans in developing our conclusions. These were the primary loan products for the bank. The weightings applied were reflective of the proportion of loans originated or purchased during the evaluation period. We gave secondary consideration to home improvement loans. The evaluation included multi-family housing loans in markets with at least fifty loans. In most markets, small farm lending did not factor into our analysis, as this is not a primary product for the bank.

In evaluating the bank's lending performance, we gave slightly more weight to the borrower distribution component than the geographic distribution of the lending test in order to give greater emphasis to lending to low- and moderate-income people. In the majority of the rating areas, the volume of community development loans and the positive responsiveness of those



loans to the needs in the community were reasons to elevate the preliminary lending test rating for that area. These situations are described in the conclusions under each rating area as appropriate.

In all markets, we did not analyze or draw conclusions on a particular loan product if less than 50 loans were made during the evaluation period. Generally, we found that analysis on fewer than 50 loans did not provide meaningful conclusions.

In our analysis of the distribution of loans to geographies with different income levels, we gave greater consideration to the bank's performance in moderate-income tracts if there were a limited number of owner-occupied housing units or businesses in the low-income tracts.

In our analysis of borrower distribution, we considered the impact that poverty levels have on the demand for mortgages from low-income individuals. We considered the high cost and overall affordability of housing in some markets, and the difficulty that low- or moderate-income applicants have in qualifying for home loans in those markets.

#### Investment Test

We gave primary consideration to the volume of investments and grants made during the current evaluation period. We also evaluated how responsive the investments were to the identified community development needs. Secondary consideration was given to investments that were made in prior evaluation periods that remain outstanding. Unfunded commitments to invest in Low-Income Housing Tax Credit partnerships or funds were also considered because these are unconditional, legally binding commitments to invest, which are recorded on the institution's financial reporting system at the time of the examination. Investments made in the bank's broader statewide and regional areas that include the bank's AAs were also given consideration, the level of which was mainly dependent on the volume of investments.

#### Service Test

We gave primary consideration to the bank's performance in delivering retail products and services to its AAs. We placed the greatest weight on the delivery of financial services and products to geographies and individuals of different income levels through the bank's distribution of branches. We focused on branches in low- and moderate-income geographies, but also considered branches in middle- and upper-income areas that are nearby low- and moderate-income areas. We analyzed the distribution of deposit taking ATMs by income level of census tract and gave positive consideration where the ATMs enhanced the access to banking services for low- and moderate-income individuals or geographies.

Where Chase opened or closed branches within an AA, we evaluated the overall impact of the changes on the area. If no branches were opened or closed during the evaluation period in an AA, we did not include that performance element in our analysis. We evaluated the range of services and products offered by all bank branches. We specifically focused on differences in branch hours and services in low- or moderate-income geographies compared to those in middle- or upper-income geographies.

The branches acquired in the WaMu transaction were included in our assessment of each affected AA. We considered whether acquired branches enhanced service availability to low- and moderate-income areas in an AA. If the acquired branches added a new AA, we evaluated the branch distribution and service accessibility across the entire AA.

JPMCB provides additional alternate delivery options for customers including 24 hour on-line banking, mobile banking applications for cellular phones, banking by phone and banking by mail. These services are offered to all bank customers and are available throughout all of the bank's markets. These options give customers great flexibility in choosing services that fit their needs. Online and mobile banking has become an effective delivery method allowing customers to access their accounts anytime from any location with the right equipment. Use of these channels has significantly grown during the evaluation period.

JPMCB provided demographic information detailing the use of online and mobile banking and telephone banking based on low-, moderate-, middle-, and upper-income areas. Demographic information revealed that an average of 16% of the customers who use on-line or mobile banking reside in LMI census tracts. And, 18% of the customers who use banking by phone are in LMI areas. The availability of these services improves accessibility for all customers and enhances the delivery of services to low- or moderate-income individuals or areas.

We evaluated the bank's record of providing community development services in AAs that received full-scope reviews. Our primary consideration in these reviews was the responsiveness to the needs of the community. Services that addressed the needs of the area, specifically the low- and moderate-income populations, and reflected ongoing relationships with organizations involved in community development received the most consideration in our analysis.

The bank offers several community development services that cover a nationwide area or multiple markets within its AAs. These services are targeted to low- and moderate-income individuals and families. Some examples of these services include:

JPMCB continues to provide Electronic Benefit Transfer (EBT) funding to predominately low- and moderate-income persons through debit or stored value cards. Under service contracts with the health and human services agencies of individual states and territories, JPMCB provides debit cards which enable recipients to access their monthly benefits held in government accounts as-needed and when-needed through a network of hundreds of thousands of ATMs and Point-of-Sale locations. During this evaluation period, the bank reportedly made over 5,200 EBTs each month. EBT benefits include cash and food stamps received through the following federal or state government programs: Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families, Special SNAP for Women, Infant and Children, and other programs like Disaster Relief through FEMA and unemployment and training benefits. Currently, JPMCB has contracts for the distribution of public assistance funds or unemployment benefits through EBT funding in 27 states. These funds, which total more than \$30 billion annually, are distributed in and to predominately low- and moderate- income geographies.

The Homeownership Preservation Office (HPO) was established to provide customers with a point of centralized contact within Chase's mortgage operations. HPO's purpose was to provide technical assistance to customers, including low- and moderate-income customers, seeking help with mortgage loan questions covering mortgage fraud, restructuring and remediation of mortgage loans; foreclosure options and how to help them sustain ownership. HPO can be contacted through a nationwide toll-free

telephone hotline. From 2007 through 2010, the HPO tracked call originations and identified over 47 thousand calls addressing homes located in low- and moderate-income census tracts across the country.

The HPO expanded its services by providing training to the employees or volunteers of affordable housing non-profit organizations and legal aid groups on loss mitigation. HPO would then remain as the point of contact at Chase as the employees or volunteers worked with their local low- and moderate-income constituents facing homeownership delinquency and foreclosure. Although these activities were innovative and sought to meet both community development organization and individual low- and moderate-income consumer needs, they were not successful.

HPO was not successful at effectively serving their communities or customers as evidenced by negative community group public comments provided, the high number of consumer complaints, and the placement of the consent order for weaknesses in the handling of mortgage mitigation/ delinquency/foreclosure issues. Therefore, very limited service test consideration for community development service is being given for the efforts of the HPO in this evaluation.

Chase Home Ownership Centers (CHOCs) began opening in 2008. CHOCs were created to provide a location where struggling mortgage borrowers could meet face-to-face with trained counselors to discuss and assess their individual circumstances and attempt to help keep them in their homes. CHOCs were opened in all income level geographies and the service is available to all income level customers. By year-end 2010, 51 CHOCs had been opened in 14 states and Washington, D.C. More than 120,000 customers have visited the CHOCs since 2009; however, the percentage of borrowers in low- and moderate-income areas was not broken out. In addition, JPMCB has held approximately 1,500 borrower events, reaching over 57,000 borrowers.

Although the concept of CHOCs is innovative and praiseworthy, in practice CHOCs were not wholly effective in assisting needy mortgage holders during the evaluation period. JPMCB's inefficiency and lack of effectiveness is documented in correspondence (complaints) from both individuals and community group representatives attempting to support their LMI clients. Furthermore, regulator findings in the bank's mortgage operations lead to the consent order between the bank and its regulators. JPMCB's continued slow progress on loan modifications into 2010 is documented in the independent Servicer Assessments reports provided as part of the April 2011 "Making Home Affordable Program Performance Report." JPMCB's intended purpose for the CHOC offices cannot offset the record of inadequate mortgage loan service and repetitive consumer complaints. Therefore, no service test consideration for community development service can be allocated for the efforts put towards the CHOC offices in this evaluation.

## Fair Lending or Other Illegal Credit Practices Review

During the evaluation period, we identified several matters which negatively impacted the bank's CRA rating. The following matters were given serious consideration in this evaluation:

- We considered the bank's actions in regards to: mortgage servicing, modification, and foreclosure practices; compliance with Servicemembers Civil Relief Act; and sworn documents.
- We considered substantive violations of section 5 of the Federal Trade Commission Act's prohibitions regarding unfair and deceptive acts and practices. The bank was fined \$2 million and certain consumers who obtained the debt cancellation product were reimbursed.
- We also considered the level of compliance with section 5 of the Federal Trade Commission Act's prohibition regarding unfair and deceptive acts and practices for other ancillary products provided by the bank.
- We conducted a number of fair lending examinations focusing on different products. The results of those examinations were considered in concluding on the bank's overall rating.

## **PRIMARY RATING AREAS**

- New York-Northern New Jersey-Long Island, NY-NJ-PA Multistate MSA
- State of Texas
- State of California
- Chicago-Joliet-Naperville, IL-IN-WI Multistate MSA
- State of Michigan

## New York-Northern New Jersey-Long Island, NY-NJ-PA Multistate MSA

CRA rating for the Rating Area <sup>1</sup> :	<b><u>Satisfactory</u></b>
The lending test is rated:	<b><u>High Satisfactory</u></b>
The investment test is rated:	<b><u>High Satisfactory</u></b>
The service test is rated:	<b><u>High Satisfactory</u></b>

The major factors that support this rating include:

- Good distribution of loans in low- and moderate-income geographies and excellent lending activity in the full-scope New York-Wayne-White Plains MD, along with positive community development lending and a very positive performance in the Other Loan Data, helped to offset poor performance in borrower distribution.
- Investment test performance was elevated from an adequate to a good level as a result of adequate qualified investment volume, a significant volume of unfunded commitments to invest, excellent responsiveness to community development needs, a high level of investment complexity, and the volume of broader regional area investments with the potential to benefit the rating area.
- Service test performance reflects an excellent record of opening and closing branches and a good distribution of branches, after considering branches which are near to low- and moderate-income areas. Business hours and the record of community development services are also good.

### Description of Institution's Operations in the Rating Area

The rating area includes all counties in the MMSA, with the exception of Pike County, PA. The MMSA contains four MDs: Edison-New Brunswick, NJ; Nassau-Suffolk, NY; Newark-Union, NJ-PA; and New York-White Plains-Wayne, NY-NJ. Chase is the largest banking institution in the New York-Northern NJ-Long Island multistate MSA rating area. As of June 30, 2010, the bank held a market share of 32% representing \$294.5 billion in deposits. The bank's primary competitors are Bank of America, N.A. and Citibank, N. A. with deposit market shares of 9% and 7%, respectively. There are 240 FDIC-insured depository institutions in the rating area, but the market is fairly concentrated with the four largest banks holding over 53% of the deposits in the rating area.

Of the bank's 29 rating areas, the New York-Northern NJ-Long Island multistate MSA ranks 1st and accounts for approximately 36% of total bank deposits. In the multistate MSA, Chase operates over 900 branch offices and over 2,300 deposit taking ATMs. In this multistate rating area, 260 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. The New York-White Plains-Wayne, NY-NJ MD represents over 87% of the bank's deposits within the rating area; as a result, this area was chosen for a full-scope review while the remaining MDs received a limited-scope review.

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

Refer to the market profile for the New York-Northern New Jersey-Long Island rating area in appendix C for detailed demographics and other performance context information.

## **LENDING TEST**

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

The bank's performance in the New York-Northern New Jersey-Long Island, NY-NJ-PA multistate MSA is High Satisfactory. The bank's performance under the lending test in the full-scope New York-Wayne-White Plains MD is considered good. Performance in the limited-scope areas did not significantly impact performance in this multistate area.

### **Lending Activity**

Refer to Tables 1 Lending Volume and 1 Other in the "Multistate New York" section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity is excellent, especially considering the strong competition in the MMSA for all types of loans. The bank originated a very large volume of loans and the lending ranks compare favorably to the bank's deposit rank. The bank is ranked fourth in the origination of home purchase and refinanced loans. The bank ranked twelfth in the origination of small loans to businesses, only exceeded by large national credit card lenders (including its affiliate) with no deposit market share in the AA.

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

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

The distribution of loans to geographies of different income levels is good. Home purchase, home improvement, and multi-family loans had excellent performance while refinance loans and lending to small businesses are good. The bank's percentage of lending for each of the home purchase, home improvement, and multi-family loans significantly exceeded the percentage of owner-occupied housing in both the low-income and the moderate-income geographies. In addition, the market share of home refinance and small business loans in low-income and moderate-income geographies is below the bank's overall market share within the MMSA. For home purchase loans, the market share in low-income geographies exceeds, and in moderate-income geographies is below, the bank's overall market share within the MMSA. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans by income level of the borrower is adequate, after taking into account the high cost of housing and poverty levels in the MMSA. Recent economic data show that the

median sales price of existing single-family homes in the AA is over \$500,000. Coupled with a poverty level of 17% of the households in the MMSA, homeownership remains very difficult for most low- and moderate-income borrowers. The updated 2010 median family income for the AA indicates that a low-income individual earns less than \$33,000 a year and a moderate-income borrower earns less than \$53,000 a year. Although performance is significantly below demographics, after considering these critical performance context factors, home purchase, home improvement, and home refinance lending is adequate. The distribution of loans to businesses of different revenue sizes is good.

## **Community Development Lending**

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

Community Development lending had a positive impact on the bank's lending performance in the MMSA. Community development opportunities are considered ample, but there is very strong competition among the city's banks for available projects. Chase originated 770 community development loans totaling nearly \$1.7 billion during this evaluation period. This volume of loans represents 8.8% of Tier 1 Capital allocated to the MMSA. Most loans served affordable housing purposes. The creation and preservation of affordable housing for low- and moderate-income families is a primary need in the area. This need is particularly evident in New York City where housing costs are among the highest in the nation. To illustrate, the bank renewed its \$34 million share in a \$150 million syndicated loan that will help construct and preserve over 30,000 units of affordable housing citywide during the next 10 years. Additionally, Chase served as lead bank for a \$45 million syndicated loan (retaining \$11.7 million), which will be used to finance the acquisition, rehabilitation and sale of HUD/FHA-foreclosed 1-4 family homes located throughout New York City.

## **Other Loan Data**

Chase issued 79 letters of credit totaling more than \$1.4 billion that have a qualified community development purpose. Nearly \$1.3 billion supported the creation or preservation of affordable housing within New York City. Another \$120 million of these letters of credit helped other organizations revitalize or stabilize low- and moderate-income geographies. Refer to Table 1, Other in the Multistate New York section of appendix D for facts and data on these letters of credit.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on performance in the full-scope area. The bank provided information on flexible loan programs in the full-scope AA, which indicated a limited volume of loan originations with flexible features.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Newark-Union, NJ-PA AAs is not inconsistent with the bank's overall good performance under the lending test in the MMSA. In the Nassau County-Suffolk County, NY MD and Edison, NJ MD,



the bank's performance is stronger than the bank's overall performance in the state. Both areas had excellent community development lending to elevate their ratings to an excellent level. Overall, performance in the limited-scope AAs did not have a significant impact on the multistate New York area rating. Refer to the Tables 1 through 12 in the Multistate New York section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

Investment test performance was elevated from an adequate to a good level as a result of adequate qualified investment volume and a significant volume of unfunded commitments in the AA, excellent responsiveness to community development needs, a high level of investment complexity, and a significant volume of broader regional area investments with the potential to benefit the AAs. Based on a full-scope review, performance in the New York-Wayne-White Plains MD is good, after consideration of the significant volume of unfunded commitments for investments in affordable housing projects. Performance in the limited-scope AAs did not significantly impact the investment test rating for the MMSA.

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

Investment test performance in the New York-Wayne-White Plains MD is good, after due consideration of the significant volume of unfunded commitments for investments in affordable housing projects as well as prior period investments. The bank funded 1,341 investments in the AA totaling \$482.7 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 331 prior period investments as of year-end 2010 was \$149 million. Additionally, over \$160 million, a significant volume, in unfunded commitments for legally-binding, Low-Income Housing Tax Credits were evident at year-end 2010.

The largest investment in the New York-Wayne-White Plains MD totaled \$34.8 million which consisted of LIHTC for the purpose of creating affordable housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services. Also, the bank invested in an innovative and creative initiative in response to the City's shortage of affordable housing, dwindling supply of city-owned land and high land cost and represents an unprecedented alliance between JPMCB, the City, other financial institutions, foundations and non-profit housing lenders.

The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing as the entire MMSA is considered a "high-cost" housing area. Accordingly, a good portion of bank's qualified investments focused on affordable housing. These obligations demonstrate the bank's continued commitment to address the community development needs of the area.

Investments in the broader regional area support the bank's investment test rating for the rating area. The bank made investments and grants to organizations and funds in a broader

regional area around the Multistate New York MSA, but not located within the bank's AAs. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 133 investments for \$50.3 million in the broader regional area with the potential to benefit the bank's AAs.

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

Performance in limited-scope AAs supported the investment test rating for the Multistate New York MSA. Based on limited-scope reviews, investment test performance in the Edison-New Brunswick, NJ MD and Newark-Union, NJ-PA MD is excellent and stronger than the overall High Satisfactory performance in the Multistate New York MSA. Stronger performance is demonstrated by a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Nassau-Suffolk, NY MD is adequate and weaker than the overall performance in the Multistate New York MSA. Weaker performance is based on a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the New York multistate metropolitan area section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in the rating area is rated High Satisfactory. Based on a full-scope review, the bank's performance in the New York-Wayne-White Plains AA is good. In this AA, the bank operates a good delivery system of retail banking services and ATMs, after considering the additional access provided by those branches located in middle- and upper-income geographies, which are near to low- or moderate-income geographies and people. The record of community development services is also good. While the bank's performance in the limited-scope AAs favorably impacted the accessibility of delivery systems, performance in limited-scope areas is not weighted heavily in the overall conclusion for the MMSA.

### **Retail Banking Services**

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

Overall service performance within the MMSA is rated High Satisfactory. A full-scope review of the New York-Wayne-White Plains MD revealed a good level of performance. The distribution of bank branches within the AA is adequate; retail delivery systems are accessible to essentially all portions of the AA. The percentage of branches in both the low- and moderate-income geographies is significantly below the percentage of low- and moderate-income population residing in these geographies. However, when giving consideration to the number of branches in middle- and upper-geographies (557) that are in close proximity or near to low- and moderate-income geographies, accessibility significantly improves for low- and moderate-income geographies and is considered good. The record of opening and closing branch offices has improved the accessibility of delivery systems particularly in low- and

moderate-income geographies. Chase opened one branch in a low-income geography and seven branches in moderate-income geographies. Chase also purchased a total of fifty-four branches (located in low- and moderate-income geographies) from the FDIC, which allowed people living in those geographies access to more Chase products and services. ATM locations are accessible to essentially all portions of the service area including low- and moderate-income geographies or individuals. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies.

### **Community Development Services**

The record of community development services in this MMSA is good; JPMCB provides a relatively high level of community development services in the full-scope area. We included community development services provided across New York State with the potential to impact this MD in this evaluation. The bank has historically cultivated relationships with community groups serving low- and moderate-income neighborhoods. However, we noted a decline in the number of organizations the bank worked with and questioned why the list of organizations declined during this evaluation period. Management reported that they consciously chose to provide more funding directly to organizations to encourage expansion of CD services directly in and to low- and moderate-income areas. Additional funding in the form of grants to Community Development organizations was evident in the investment test evaluation.

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

Based on limited-scope reviews, service test performance in the Newark-Union MD is not inconsistent with performance in the MMSA. However, performance in the Edison MD and the Nassau-Suffolk MD was stronger than the bank's overall performance in the MMSA and considered excellent. This stronger performance is attributable to more favorable branch distribution and service accessibility. Performance in the limited-scope areas supported the overall rating. Refer to the Table 15 in the New York multistate metropolitan area section of appendix D for the facts and data that support these conclusions.

## State of Texas

<b>CRA rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors that support this rating include:

- A significant volume of community development lending elevated an otherwise adequate lending performance to a good level. The bank had adequate geographic and borrower distributions and excellent lending activity.
- Good responsiveness to the community development needs of the rating area based on qualified investment volume. Significant volumes of unfunded commitments and investments outstanding from the prior period elevated the investment test rating for several of the AAs in the state. A significant volume of broader statewide and regional area investments with the potential to benefit the state further support the investment test rating for the state.
- Good service test performance resulted from good branch and ATM distribution, after considering the additional benefit from those branches located near to low- or moderate-income geographies, and an excellent record of opening and closing branches. Business hours and the level of community development services are also good.

## Description of Institution's Operations in the State

Chase is ranked first in the state of Texas for deposits with \$80.4 billion for a market share of 16%. The bank operates nearly 650 branches and over 1,000 deposit taking ATMs in the state. For this state rating area, 171 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. There are over 600 FDIC-insured depository institutions in the rating area, providing strong competition for the bank. Despite the number of institutions competing, the top five banks account for nearly 53% of the deposits in the state.

The bank has delineated 27 AAs in the state, 21 of which are MSAs and six of which are non-metropolitan areas. Within Texas, 51.2% of the bank's deposits are concentrated in the Houston-Sugar Land-Baytown MSA AA; therefore, it was selected for a full-scope review. The remaining MSAs and combined non-metropolitan AAs were analyzed using limited-scope procedures. The bank's deposits in the state represent over 15% of its overall deposits. As a result, the state is considered a primary rating area.

Refer to the market profiles for the state of Texas in appendix C for detailed demographics and other performance context information.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Texas is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Houston-Baytown-Sugar Land, TX AA is good. The full-scope area contains 51% of the bank's deposits within the state. The Dallas-Plano-Irving AA is a limited-scope area, but contains 31% of the bank's deposits within the state. Performance in this AA is weaker than the performance we noted in the Houston-Baytown-Sugar Land AA because of the nominal amount of community development lending. The remaining limited-scope areas had varying levels of community development lending where some enhanced performance, often to a good level, and others had little to no community development lending. Although the remaining limited-scope areas represent a much smaller portion of the bank's operations in the state, overall, these limited-scope areas did have some impact on lending test performance in the state.

### Lending Activity

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

Lending activity is excellent. The bank's market share for its loan products compares favorably to its number one deposit market share. The bank's home purchase and refinance loans rank in the top five for each loan type, even with strong competition from national mortgage lenders. The bank ranks ninth for home improvement lending in the AA. The small business products rank fifteenth. The bank competes with large credit card banks, including its affiliate, for small business loans.

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

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

The distribution of loans within geographies of different income levels was adequate, specifically in the full-scope AA. Small business lending was excellent in both low- and moderate-income geographies. Home purchase lending was adequate with adequate performance in low-income census tracts and poor in moderate-income tracts with excellent market. Home improvement lending was good in both low- and moderate-income geographies. Refinance lending performance was poor in both low- and moderate-income tracts, with adequate market share performance in the low- and moderate-income census tracts. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was adequate. Home purchase, home improvement, and small business lending were good. However, this was offset by adequate performance for home refinance lending. Even though we considered the impact that 15% poverty levels as well as declines in the property values had in the full-scope area for home refinance lending, the adequate performance diminishes the good performance in the other three lending products.

## **Community Development Lending**

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

Community development lending had a positive impact on performance in the full-scope area. The bank originated 58 community development loans totaling \$352 million. This equals 7.5% of Tier 1 Capital allocated to the Houston-Baytown-Sugar Land AA. The vast majority of the loans helped provide affordable housing or revitalize/stabilize low- and moderate-income areas. An example is the bank provided \$9.2 million in construction financing for 132-unit LIHTC property. The project also involved complex layers of financing, including a \$1.5 million HOME loan from the City of Houston and \$9.3 million in equity. The bank provided a \$7.6 million construction loan that helped create 123 units of affordable rental housing.

## **Other Loan Data**

Chase provided for consideration 13 standby letters of credit totaling \$81.5 million that facilitated the creation of affordable housing. Refer to Table 1 Other in the state of Texas section of appendix D for facts and data on these letters of credit.

## **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Dallas-Plano-Irving AA, the bank made over 23,000 mortgage loans under various flexible mortgage programs.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Amarillo, Austin-Round Rock, Beaumont-Port Arthur, Fort Worth-Arlington, Killeen-Temple-Fort Hood, San Antonio, and Tyler is not inconsistent with the bank's overall good performance under the lending test in state of Texas. All of these AAs generally had an adequate overall lending performance, but had excellent volumes of community development lending that elevated performance to a good level. In the Abilene, Brownsville-Harlingen, Dallas-Plano-Irving, Laredo, Longview, McAllen-Edinburg-Pharr, Sherman-Denison, Wichita Falls, and non-metropolitan AAs, the bank's performance is weaker than the bank's overall performance in the state, but considered adequate. The Abilene, Laredo, McAllen-Edinburg-Pharr, and non-metropolitan AAs had poor lending performance that was elevated to the adequate level by an excellent volume of community development loans. There were minimal or no community development loans made in the Dallas-Plano-Irving, Longview, Sherman-Denison, and Wichita Falls MSAs, which would have helped to enhance performance. Community development

lending in the Brownsville-Harlingen AA had a neutral impact on our conclusions for this area. Performance in the College Station-Bryan, El Paso, Midland, Odessa, and Waco AAs is weaker than the bank's overall performance in the state. The number of community development loans made in these areas had a neutral impact on the rating. Refer to the Tables 1 through 12 in the state of Texas section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Texas is rated High Satisfactory. Based on a full-scope review, performance in the Houston-Baytown-Sugar Land AA is good. Performance in several of the limited-scope AAs supports the investment test rating for the state. Significant volumes of unfunded commitments and investments remaining outstanding from prior periods elevated the investment test rating in several AAs. Broader statewide and regional area investments help to support the rating for the state.

Refer to Table 14 of appendix D for the data used to evaluate the bank's level of qualified investments in the rating area.

Investment test performance in the Houston-Baytown-Sugar Land AA is good. JPMCB funded 215 investments in the Houston AA totaling \$148.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 50 prior period investments as of year-end 2010 was \$89.5 million. Additionally, approximately \$36.2 million in legally-binding, unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development needs in the AA is good, with the majority of investments related to affordable housing and community services. The largest investment in the Houston-Baytown-Sugar Land MSA totaled \$14.4 million, which consisted of a New Markets Tax Credit investment in a project designed to acquire and renovate a facility to be used to house one of the largest food banks in the country. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Investments in the broader statewide and regional areas helped to support the bank's overall performance under the investment test for the state. The bank made investments and grants to organizations and funds throughout the state of Texas and in a broader regional area around Texas, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 26 investments for \$42.9 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 16 investments with remaining balances totaling \$4.7 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 17 investments for \$13.2 million in the broader regional area with the potential to benefit

the bank's AAs. In the prior period, the bank made 46 investments with remaining balances totaling \$9.5 million in the broader regional area with the potential to benefit the bank's AAs.

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

Performance in limited-scope AAs was varied, but generally supported the investment test rating for Texas. Significant volumes of legally-binding, unfunded commitments to invest and investments remaining outstanding from prior periods elevated the investment test rating in several AAs. Based on limited-scope reviews, investment test performance in the Abilene, Amarillo, Austin-Round Rock, Beaumont-Port Arthur, Brownsville-Harlingen, El Paso, Odessa, San Antonio and Tyler AAs is excellent and stronger than the overall High Satisfactory performance in Texas. Stronger performance is based on a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Fort Worth-Arlington, Killeen-Temple-Fort Hood, Longview, and McAllen-Edinburg-Pharr AAs is also considered excellent after giving consideration to significant volumes of legally-binding, unfunded commitments and prior period investments remaining outstanding. Performance in the College Station-Bryan AA is good and not inconsistent with the overall performance in Texas. Performance in the Dallas-Plano-Irving and Midland AAs is adequate and weaker than the overall performance in Texas. Performance in the Texas Non-MSA is poor and significantly weaker than the overall performance in Texas, even after considering prior period investments remaining outstanding. Performance in the Laredo, Sherman-Denison, Waco and Wichita Falls MSAs is very poor and significantly weaker than the overall performance in Texas. Weaker performance is due to a lower amount of qualified investments relative to the bank's operations in the AA. Refer to Table 14 in the state of Texas section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Texas is rated High Satisfactory. Performance in the Houston-Baytown-Sugar Land full-scope AA is good. Community development services provided in the broader statewide area with the potential to impact the AA were included in the full-scope evaluation. Performance in the limited-scope AAs did not significantly impact the service test rating for Texas.

### **Retail Banking Services**

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

Performance in the Houston- Baytown-Sugar Land MSA is good and services are accessible to essentially all portions of the AA. The distribution of bank branches in low- and moderate-income geographies in the full-scope area is adequate, providing reasonable accessibility. However, when considering the number of branches in close proximity to low- and moderate-income geographies, service accessibility improves significantly in both low- and moderate-income geographies. Branch hours do not vary in a way that inconveniences certain portions



of the AA, particularly low- and moderate-income geographies. Branch openings and closings positively affected accessibility of delivery systems in the AA and the state of Texas. In the Houston AA, the bank opened a net of 19 branches. Statewide, the bank opened a net of 82 branches, including two in moderate-income geographies. The ATM network offers an alternative delivery system to LMI geographies and individuals through full-service ATM's in the AA.

Traditional banking services are augmented by the bank's Rapid Cash program. Use of this product benefits low- and moderate-income geographies, as 53% of the Rapid Cash transactions initiated in the state originated in low- and moderate-income areas. Texas was responsible for 29% of all Rapid Cash transactions bank-wide during the evaluation period.

### **Community Development Services**

The bank provided a good level of CD services to the full-scope area. Including the broader statewide organizations with the potential to impact the AA, the bank was involved in community development services with over 40 organizations. This performance included a relatively high level of leadership through membership on Boards and committees in various CD organizations that focus on identified needs within the community. CD services included affordable housing initiatives, homebuyer education efforts and financial literacy programs.

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

Based on limited-scope reviews, service test performance in the Austin-Round Rock, San Antonio, and Tyler AAs was not inconsistent with the good performance in the state of Texas. The bank's performance in the El Paso, Longview, Sherman-Denison, and the non-metropolitan AAs was stronger than its performance in the rating area and is considered excellent. This was mainly due to branches in the AAs being readily accessible to individuals in low- and moderate-income areas. The bank's performance in the Abilene, Amarillo, Beaumont-Port Arthur, Brownsville-Harlingen, College Station-Bryan, Dallas-Plano-Irving, Fort Worth- Arlington, Killeen-Temple-Fort Hood, Laredo, McAllen-Edinburg-Mission, Midland, Odessa, Waco, and Wichita Falls AAs is weaker than its performance in the rating area. Despite being weaker, performance in all of these AAs is considered adequate.

Retail delivery service performance in the limited-scope areas did not significantly impact the state of Texas service test rating. Areas rated adequate hold 43% of total deposits. Whereas the areas rated excellent and good, including the full-scope area, hold 58% of total deposits in the state. Refer to Table 15 in the state of Texas section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## State of California

**CRA rating for the Rating Area:** 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:

- A significantly positive volume of community development loans raised a good distribution of loans within geographies of different income levels and a good distribution of loans to borrowers of different income levels to an excellent level. In addition, the bank had excellent lending activity in a state with strong competition for loans.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Good, though varied, service test performance is the result of good branch and ATM distribution in most areas, good branch hours, and an excellent record of branch opening activity. Generally good performance in many of the limited-scope areas supports the state rating as well. Performance is diminished somewhat by a poor record of community development services.

## Description of Institution's Operations in the State

The bank has 32 AAs within the state; 28 are in MSAs with the remaining AAs in non-metropolitan areas. Within the state, 33.8% of the bank's deposits are concentrated in the Los Angeles-Long Beach-Glendale MD, 10% of the bank's deposits are in the San Diego-Carlsbad-San Marcos MSA, and 7.9% of the bank's deposits are in the Oakland-Fremont-Hayward MD. Therefore, these three areas were selected for a full-scope review. The remaining MSAs and combined non-metropolitan AAs were analyzed using limited-scope procedures.

The state became a new rating area for the bank during the evaluation period. This occurred as a result of the bank's purchase from the FDIC of certain assets of WaMu, which failed in 2008.

Chase operates over 800 branches and over 2,000 deposit taking ATMs in California. For the state rating area, over 700 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. Statewide, the bank holds \$60.9 billion of deposits, which represents 11.4% of the bank's total deposits. Among over 300 financial institutions operating in the state, the bank holds the fourth-highest amount of deposits with 7.2% of the market share. Refer to the market profiles for the state of California in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's lending test performance in California is rated Outstanding. Based on full-scope reviews, performance in the Los Angeles-Long Beach-Glendale MD, Oakland-Fremont-Hayward MD, and San Diego-Carlsbad-San Marcos MSA is excellent. The limited-scope areas did not significantly impact lending test performance in the state.

### Lending Activity

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

Lending activity in the Los Angeles-Long Beach-Glendale MD is excellent. Ranked fourth in deposit market share, the bank ranks fourth in each category of market share for home purchase, home improvement, and home refinance loans among local deposit taking institutions and national lenders within the MD. In addition, the bank's small business lending market share rank for deposit taking institutions is twenty-seventh, which is considered adequate with much competition and credit card lenders taking 77% of the market share.

Lending activity in the Oakland-Fremont-Hayward MD is excellent. Ranked third in deposit market share, the bank ranks sixth, seventh, and fifth in market share for home purchase, home improvement and home refinance loans among local deposit taking institutions and national lenders in the MD respectively. In addition, the bank is ranked seventeenth in market share for small business lending for local deposit taking institutions.

Lending activity in the San Diego-Carlsbad-San Marcos MSA is excellent. Ranked fourth in deposit market share, the bank ranks fourth, fifth, and fourth in market share for home purchase, home improvement, and home refinance loans among local deposit taking institutions and national lenders within the AA, respectively. In addition, the bank has the eleventh ranked market share for small business lending for local deposit taking institutions.

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

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

The distribution of loans within geographies of different income levels was good in the Los Angeles-Long Beach-Glendale MD. Home purchase, home improvement and small business lending was excellent in both low- and moderate-income geographies. Home refinance lending was adequate with adequate performance in both low- and moderate-income census tracts. Multi-family lending was good with good performance in the low-income geographies and excellent performance in the moderate-income geographies.

The distribution of loans within geographies of different income levels was good in the Oakland-Fremont-Hayward AA. Home purchase, home improvement, multi-family, and small

business lending was excellent in both low- and moderate-income geographies. Home refinance lending was adequate with adequate performance in both low- and moderate-income census tracts. Market share is considered excellent for each of the HMDA lending products, which lowered the overall ratings.

The distribution of loans within geographies of different income levels was good in the San Diego-Carlsbad-San Marcos AA. Home purchase, home improvement, and home refinance lending was excellent in low-income geographies and adequate in moderate-income geographies. Small business lending was good in low-income geographies and excellent in moderate-income geographies. Multi-family lending was excellent in both the low- and moderate-income geographies.

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

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

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

The distribution of loans to borrowers of different income levels was adequate in the Los Angeles-Long Beach-Glendale MD. Home purchase and home improvement lending was poor to low-income borrowers and adequate to moderate-income borrowers. All three products had excellent market share. Home refinance lending was poor to both low- and moderate-income borrowers. However, the adequate and poor lending performance was offset by excellent market share performance for the three HMDA lending products. We considered the impact that 16% poverty levels, as well as the high cost of housing, had in the full-scope area. The borrower distribution of small loans to businesses is good in the Los Angeles-Long Beach-Glendale MD.

The distribution of loans to borrowers of different income levels was adequate in the Oakland-Fremont-Hayward AA. Home purchase and home improvement lending was poor to low-income borrowers and excellent to moderate-income borrowers. Home refinance lending was poor to low-income borrowers and adequate to moderate-income borrowers. However, this was offset by excellent market share. We considered the impact that 11% poverty levels had in the full-scope area for home purchase lending. The borrower distribution of small loans to businesses in the AA is adequate.

The distribution of loans to borrowers of different income levels was good in the San Diego-Carlsbad-San Marcos MSA. Home purchase lending was poor to low-income borrowers and good to moderate-income borrowers. Home improvement lending was good to low-income borrowers and excellent to moderate-income borrowers. Refinance lending was poor to low-income borrowers and adequate to moderate-income borrowers. All three HMDA products had excellent market share. We considered the impact that 13% poverty levels had in the full-scope area for home purchase lending. The borrower distribution of small loans to businesses in the AA is good.

## Community Development Lending

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

Community development lending had a significant, positive impact on lending performance in the Los Angeles AA. The bank originated 571 community development loans, which totaled \$601.3 million or 25.7% of Tier 1 Capital allocated to the AA. The substantial majority of the dollar volume targeted affordable housing. Two such examples include a \$9.2 million construction loan for 75 units of affordable housing in a low-income tract for families earning 30-60% of the adjusted Median Family Income (MFI). Located in a low-income census tract in the Wilshire/Westlake District of Los Angeles, the project's location is currently vacant. The bank provided an \$11.2 million construction loan for 85 units of affordable housing for families earning 30-60% of the adjusted MFI. The project will be developed through the Federal LIHTC program and targeted to low-income elderly households.

Community development lending had a significant, positive impact on lending performance in the Oakland AA. The bank originated 99 community development loans, which totaled \$208.4 million or 38% of Tier 1 Capital allocated to the AA. The substantial majority of the dollar volume targeted affordable housing. One community development loan that the bank provided was a \$5.1 million participation in a \$10.3 million construction loan for 51 units of affordable housing for seniors aged 62 and older with incomes not exceeding 50% of the median household income.

Community development lending had a significant, positive impact on lending performance in the San Diego MSA AA. The bank originated 107 community development loans, which totaled \$126.5 million or 18.3% of Tier 1 Capital allocated to the AA. The entire dollar volume targeted affordable housing. One example of the bank's community development lending in this AA is a \$6.4 million construction loan for 61 units of affordable housing in a low-income tract. All apartments will be affordable to seniors earning between 30% and 60% of the area median income. In addition, Chase's Tax Oriented Investments group made a \$6.5 million Low-Income Housing Tax Credit (LIHTC) investment in the property.

## Other Loan Data

Chase provided for consideration one standby letter of credit totaling \$3.5 million that has a qualified community development purpose in the Los Angeles MD, one standby letter of credit totaling \$9.8 million that has a qualified community development purpose in the San Diego MSA and none in the Oakland MD. Refer to Table 1 Other in the state of California section of appendix D for facts and data on this letter of credit.

## Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on performance in the full-scope areas. The bank provided information on flexible loan programs in the full-scope AAs, which indicated a limited volume of loan originations with flexible features.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Chico, Merced, Napa, Redding, Riverside-San Bernardino-Ontario, San Francisco-San Mateo-Redwood City, San Jose-Sunnyvale-Santa Clara, Santa Ana-Anaheim-Irvine, Santa Barbara-Santa Maria-Goleta, Santa Cruz-Watsonville, and Santa Rosa-Petaluma is not inconsistent with the bank's overall excellent performance under the lending test in state of California. The Bakersfield-Delano, El Centro, Fresno, Hanford-Corcoran, Modesto, Oxnard-Thousand Oaks-Ventura, Sacramento-Arden-Arcade-Roseville, Salinas, San Luis Obispo-Paso Robles, Stockton, Vallejo-Fairfield, Visalia-Porterville, and California non-MSA AAs generally had adequate overall lending performance, but had excellent volumes of community development lending that elevated our conclusion to the good level. In the Madera-Chowchilla and Yuba City-Marysville AAs, the bank's performance is weaker, but adequate, than the bank's overall performance in the state. There was little to no community development lending in these AAs, which had a neutral impact on our conclusions for these areas. Refer to the Tables 1 through 12 in the state of California section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

Investment test performance in California is rated Outstanding. Based on a full-scope review, performance in the Los Angeles-Long Beach-Glendale MD, the Oakland-Fremont-Hayward MD, and San Diego-Carlsbad-San Marcos MSA is excellent. Performance in the limited-scope AAs did not significantly impact the investment test rating for the state.

Refer to Table 14 of appendix D for the data used to evaluate the bank's level of qualified investments in the rating area.

Performance in the Los Angeles-Long Beach-Glendale MD is excellent based on the significant volume of investments. The bank funded 362 investments in the Los Angeles MD totaling \$510.4 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 51 prior period investments as of year-end 2010 was \$48.3 million. Additionally, approximately \$73.5 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing as the entire Los Angeles MSA is considered a "high-cost" housing area. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The largest set of investments in the Los Angeles-Long Beach-Glendale MD consisted of five investments totaling \$302.8 million which consisted of investing in bonds for the Los Angeles Unified School District. The bank also invested \$14.1 million in New Market Tax Credits for the development of a community center and headquarters whose mission it is to provide community services, including job training and short term housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing economic development, affordable housing and community services.

Performance in the Oakland-Fremont-Hayward MD is excellent based on the significant volume of investments. The bank funded 87 investments in the Oakland-Fremont-Hayward MD totaling \$62.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 22 prior period investments as of year-end 2010 was \$24.1 million. Additionally, approximately \$12.3 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing as the entire San Francisco-Oakland-Fremont MSA is considered a "high-cost" housing area. These obligations demonstrate the bank's continued commitment to address the community development needs of the area.

The largest investment in the Oakland-Fremont-Hayward AA totaled \$11.5 million, which consisted of an equity investment in a New Markets Tax Credit fund to support the completion of tenant improvements to the offices of an organization dedicated to disability rights and universal access for predominately low-income individuals. Chase also invested \$9.7 million in one project and \$6.3 million in another project, both with the purpose of providing affordable housing through LIHTCs. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Performance in the San Diego-Carlsbad-San Marcos MSA is excellent based on the significant volume of investments. The bank funded 102 investments in the San Diego MSA totaling \$109.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 26 prior period investments as of year-end 2010 was \$24.2 million. Additionally, approximately \$16.6 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing as the entire MSA is considered a "high-cost" housing area. These obligations demonstrate the bank's continued commitment to address the community development needs of the area.

The largest set of investments in the San Diego-Carlsbad-San Marcos MSA consisted of \$20.8 million for a project that provided affordable rental housing through LIHTC. JPMCB also invested \$12.8 million, \$6.4 million \$5.4 million and \$5.4 million in similar projects designed to provide affordable rental housing through LIHTC. Other investments consisted primarily of investments in affordable housing and economic development and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of California and in a broader regional area around California, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 41 investments for \$44.0 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made one investment with a remaining balance of \$2.5 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made two investments for \$2.8 million in the broader

regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

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

Performance in limited-scope AAs did not negatively impact the investment test rating for California. Based on limited-scope reviews, investment test performance in the Bakersfield-Delano, Chico, El Centro, Fresno, Hanford-Corcoran, Madera-Chowchilla, Merced, Napa, Oxnard-Thousand Oaks-Ventura, Redding, Riverside San Bernardino-Ontario, Sacramento-Arden Arcade-Roseville, Salinas, San Francisco-San Mateo-Redwood City, San Jose-Sunnyvale-Santa Clara, Santa Rosa-Petaluma, Vallejo-Fairfield, Visalia-Porterville, Yuba City-Marysville, and the California Non-MSA is excellent and not inconsistent with the overall Outstanding performance in California. Performance in the Santa Ana-Anaheim-Irvine and Stockton MDs is good and weaker than the overall performance in California. Performance in the San Luis Obispo-Paso Robles and Santa Barbara-Santa Maria-Goleta MDs is adequate and weaker than the overall performance in California. Performance in the Modesto MD is poor and significantly weaker than the overall performance in California. Performance in the Santa Cruz-Watsonville MD is very poor and significantly weaker than the overall performance in California. Weaker performance is due to a lower amount of qualified investments relative to the bank's operations in the AA. Refer to Table 14 in appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in California is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Los Angeles-Long Beach MD is adequate, in the Oakland-Fremont-Hayward MD it is good, and in the San Diego-Carlsbad-San Marcos MSA it is excellent. Generally good, though varied, performance in many of the limited-scope AAs benefited and helped to elevate the overall rating for the state of California to a good level. The bank's record of providing community development service is considered poor.

### **Retail Banking Services**

Service test performance in the Los Angeles-Long Beach-Glendale AA is adequate. The distribution of bank branches in the Los Angeles-Long Beach-Glendale AA is adequate, after considering the number of branches (92) located near to low- and moderate-income areas. Near to branches are those located in middle- or upper-income census tracts that are within one-half mile of low- or moderate-income census tracts. After considering these nearby branches, accessibility improved significantly from an otherwise poor to an adequate level. The percentage of branches located in both low- and moderate-income areas is significantly lower than the percentage of population residing in these geographies. The bank has a strong record of opening branches in this area as it opened 26 branches, including one in a low-income and one in a moderate-income area. Hours of service are good and do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies. The



distribution of full-service ATMs is considered good, considering there are over 160 ATMs that are located in just low- and moderate-income geographies in this AA.

Service test performance in the Oakland-Fremont-Hayward AA is good. The distribution of bank branches in the area is good, especially after considering the number of branches (26) located near to low- and moderate-income areas. Near to branches are those located in middle- or upper-income census tracts, which are within one-half mile of low- or moderate-income census tracts. After considering these nearby branches, accessibility improved significantly from an otherwise adequate to a good level. The percentage of branches located in both low- and moderate-income areas is less than the percentage of population residing in these geographies. The bank has a strong record of opening branches in this area as it opened six branches, including one in a moderate-income area. Hours of service are good and do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies. The distribution of full-service ATMs in the AA is excellent, considering there are over 30 ATMs that are located in just low- and moderate- income geographies in this AA.

Service test performance in the San Diego-Carlsbad-San Marcos AA is excellent. The distribution of bank branches in the area is excellent, as services are readily accessible to low- and moderate-income geographies. The bank has a strong record of opening branches in this area as it opened 14 branches, including one in a low-income area and five in moderate-income areas. Hours of service are good and do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies. The distribution of full-service ATMs in the AA is also excellent.

Traditional banking services are augmented by the bank's Rapid Cash program. Use of this product benefits low- and moderate-income geographies across the state including the full-scope areas, as 57% of the Rapid Cash transactions initiated in the state originated in low- and moderate-income areas. California was responsible for 25% of all Rapid Cash transactions bank-wide during the evaluation period.

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

## **Community Development Services**

The bank provided a poor level of community development services in all three of the full-scope AAs. The bank provided a limited level of community development services in each of the full scope areas even though economic and social needs are apparent and opportunities to work with established CDFI and non-profit organizations are abundant. California is one of the top ten foreclosure states with a continued need for foreclosure prevention assistance.

The Los Angeles-Long Beach-Glendale CA AA is a large diverse community experiencing extremely high housing costs, high unemployment, poverty and a need for financial education, job training and other development services. Over the 28 month evaluation period, the bank recorded 50 CD service events with 19 organizations including 12 Board and committee roles. This level of service is poor, given the bank's large deposit base (almost 4% of total bank deposits) and 221 branches in the area.

In the Oakland-Fremont-Haywood, CA MD analysis, we included services provided in the broader statewide area with potential to benefit this AA. The bank recorded 16 service events created in partnership with 7 community development organizations. Two board membership were evident, both in the broader services. The additional items did not reflect adequate responsiveness to the community's significant needs.

In the San Diego-Carlsbad-San Marcos MSA, the bank reported 25 community service events, including 14 "Mortgage days at the branch" with a total of eight organizations. Board leadership is evident with seven board positions reported however given the considerable needs of the community this level is poor.

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

Varied, but generally good, performance in many of the limited-scope AAs benefited and helped to elevate the overall rating for the state of California to a good level. Based on limited-scope reviews, service test performance in the Hanford-Corcoran, Madera-Chowchilla, Merced, Napa, Salinas, San Francisco-San Mateo-Redwood City, San Louis Obispo-Paso Robles, Santa Rosa-Petaluma, Yuba City-Marysville, and the non-metropolitan AAs is excellent and stronger than the overall performance in the state.

Performance in the Riverside-San Bernardino-Ontario, Santa Ana-Anaheim-Irvine, Santa Barbara-Santa Maria-Goleta, Stockton, and Vallejo-Fairfield AAs is not inconsistent with the overall good performance in the state. Performance in the Chico, El Centro, Redding, San Jose-Sunnyvale-Santa Clara, Santa Cruz-Watsonville, and Visalia-Porterville AAs is weaker, but considered adequate. The bank's performance in the Bakersfield-Delano, Fresno, Modesto, Oxnard-Thousand Oaks-Ventura, and Sacramento-Arden Arcade-Roseville AAs is also weaker than the performance in the state, due to a less-accessible branch network.

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

## Chicago-Joliet-Naperville, IL-IN-WI Multistate MSA

CRA rating for the rating area<sup>2</sup>: Outstanding  
 The lending test is rated: Outstanding  
 The investment test is rated: Outstanding  
 The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volumes of community development lending helped elevate otherwise good lending performance to the excellent level. The bank had good distributions of loans to borrowers within geographies of different income levels and to borrowers of different income levels.
- Excellent responsiveness to the community development needs of the rating area based on qualified investment volume and complexity.
- Service test performance reflects an adequate distribution of branches, good service hours, and a good record of community development service.

### Description of Institution's Operations in the Rating Area

The Chicago-Joliet-Naperville MMSA consists of the following three MDs: Chicago-Joliet–Naperville, IL; Gary, IN; and Lake County-Kenosha, IL-WI. All counties in the MMSA are included in the AA with the exception of Jasper and Newton counties in the Gary, IN MD.

As of June 30, 2010, bank deposits in the MMSA totaled \$49.2 billion. This represents 9.2% of the bank's total deposits. In terms of deposit market share, the bank ranks first with a 17.2% market share. Bank of America N.A. is second with a deposit market share of 11%, and Harris N.A. ranks third with a market share of 9%. There are over 270 FDIC-insured depository institutions in the rating area.

Within this rating area, the bank operates over 400 branches and over 1,000 deposit taking ATMs. In this multistate rating area, 60 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. The bank has the highest number of branches within the rating area of any institution. Within the MMSA, 91.6% of the bank's deposits are concentrated in the Chicago-Joliet-Naperville MD. With the largest share of bank deposits in the MMSA, this AA was selected for full-scope review. The remaining AAs were analyzed using limited-scope procedures. Ranked by deposits, the Chicago-Naperville-Joliet rating area is the fourth-largest rating area for the bank representing over 9% of the bank's deposits. As a result, this area is considered a primary rating area for the bank.

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<sup>2</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Refer to the market profile for the Chicago-Naperville-Joliet, IL-IN-WI MMSA in appendix C for detailed demographics and other performance context information for the AA that received a full-scope review.

## **LENDING TEST**

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

The bank's performance under the lending test in the Chicago-Naperville-Joliet, IL-IN-WI MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the Chicago-Naperville-Joliet, IL MD AA is excellent. Performance in the limited-scope areas did not significantly impact the lending test rating for this multistate area.

### **Lending Activity**

Refer to Table 1 Lending Volume in the Multistate Chicago section of appendix D for the facts and data used to evaluate the bank's lending activity.

Lending activity in the Chicago-Naperville-Joliet AA is excellent. With the largest deposit market share, the bank ranks fourth, sixth, and third in market share for home purchase, home improvement, and home refinance loans among local deposit taking institutions within the MMSA, respectively. Chase ranks fifteenth for small business lending in the MSA. Credit card banks, including the bank's affiliate, are the top five small business lenders with almost 67% of the market share.

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

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

The geographic distribution of loans is good. Home purchase and home improvement loans demonstrated excellent penetration into low- and moderate-income geographies with refinance loans showing good penetration. The distribution of small business loans was good. The distribution of multi-family lending is also good with performance in the moderate-income geographies excellent and performance in the low-income geographies good. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans by income level of the borrower is good. Adequate performance in home improvement and refinance loan products slightly affected good performance for the home purchase loans and small businesses loans with different revenues. For our analysis of mortgage lending, we considered the 13% poverty levels and high cost of housing in the AA as

barriers that would limit the ability of low- and moderate-income individuals to enter the housing market.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on the lending test for the AA. The bank made 190 community development loans totaling over \$621 million. The dollar volume represented 12.1% of Tier 1 Capital allocated to the Chicago-Naperville-Joliet, IL AA. Over three quarters of the dollar volume were used primarily to address the affordable housing needs of low- and moderate-income residents. Another 17% were used to revitalize or stabilize low- and moderate-income neighborhoods.

The AA can be characterized as having a high level of opportunities and has astute, well-organized community development organizations. Even with the many opportunities present, the bank's high volume of community development lending is particularly noteworthy because of the very strong level of competition among banks for these community development opportunities. An example that demonstrated excellent responsiveness is an \$18.5 million construction loan to partially finance 118 mixed-income rental units in the Bronzeville area of Chicago, an area where the average income level is more than 50% lower than the Chicago MMSA. The site formerly housed a portion of a 4,300 unit, 28 building public housing project.

## **Other Loan Data**

Chase provided for consideration eight standby letters of credit totaling \$5.8 million that have qualified community development purposes. The bulk of these letters of credit facilitated the creation of affordable housing. Refer to Table 1 Other in the Multistate Chicago section of appendix D for facts and data on these letters of credit.

## **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Chicago-Naperville-Joliet AA, the bank made over 22,000 mortgage loans under various flexible mortgage programs.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Lake County-Kenosha County, IL-WI MD and the Gary, IN MD is weaker than the performance noted in the MMSA, but still considered good. The Lake County-Kenosha County MD and Gary, IN MD both benefited from community development lending that helped elevate performance in the Chicago-Naperville-Joliet area to the Outstanding level. The Lake County AA had adequate geographic distribution with good borrower distribution performance and the Gary, IN AA had a poor geographic distribution with good borrower distribution performance. Overall, performance in the limited-scope AAs did not have a significant impact on the

multistate Chicago area. Refer to the Tables 1 through 12 in the Multistate Chicago section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's overall investment test performance in the Chicago MMSA is rated Outstanding. Based on a full-scope review, performance in the Chicago-Naperville-Joliet, IL MD is excellent. The bank's responsiveness to the identified needs of the AA is excellent, especially with respect to affordable housing. Performance in the limited-scope AAs did not materially impact the investment test rating for the MMSA.

Refer to Table 14 in the Multistate Chicago section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Performance in the Chicago-Naperville-Joliet, IL MD is excellent. During the evaluation period, the bank funded 740 investments in the full-scope area totaling \$369.0 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 126 prior period investments as of year-end 2010 was \$125.1 million. Additionally, approximately \$82.0 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area.

The largest investment in the Chicago-Naperville-Joliet MD totaled \$63.0 million, which consisted of the purchase of Unlimited Tax General Obligation Bonds. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services. Additionally, the bank demonstrated leadership and complexity by organizing a \$30.5 million investment with multiple sources of financing for a project to develop affordable housing as part of master planned neighborhood development that is expected to include retail and office space in the Wilson Yard area.

The bank also made investments and grants to organizations and funds in a broader regional area around the MMSA, but not located within the bank's AAs. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 15 investments for \$15.7 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 46 investments with remaining balances totaling \$30.2 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader regional area enhanced the bank's overall performance under the investment test for the rating area.

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

Based on limited-scope reviews, investment test performance in the Gary, IN MD and Lake County-Kenosha County, IL-WI MD is excellent and not inconsistent with the overall Outstanding performance in the Multistate Chicago MSA. Performance in the limited-scope

AAs is not heavily weighted in the overall conclusion for the MMSA. Refer to Table 14 in the Multistate Chicago section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

## **SERVICE TEST**

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

The bank's performance under the service test in the Chicago-Joliet-Naperville, IL-IN-WI MMSA is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Chicago-Joliet-Naperville, IL MD is adequate. This rating is supported by an adequate level of retail services and a good level of community development services. Performance in the limited-scope AAs did not materially impact the service test rating for this MMSA.

### **Retail Banking Services**

The bank's performance in the Chicago-Joliet-Naperville MD is adequate, demonstrated by good service hours, a good record of community development services, and adequate accessibility of retail services. The distribution of bank branches within the full-scope area is adequate, as they are reasonably accessible to all portions of the AA. The percentage of the bank's branches located in low- and moderate-income tracts is significantly below the percentage of the AA's population residing in those tracts. However, after considering near-to branches, accessibility improved significantly in both low- and moderate-income tracts. Near-to branches are those located in middle- or upper-income census tracts that are within one-half mile of a low- or moderate-income census tract. Although the bank has the highest number of branches within the Chicago MD, 81% of the bank's branches are located in middle- and upper-income tracts while only 67% of the population lives in those tracts.

The record of opening and closing branch offices in this AA has adversely affected the accessibility of delivery systems particularly in low- and moderate-income geographies. Although the bank opened a net of 20 branches overall in the AA during the evaluation period, net branch changes resulted in four branch closings in low-income geographies and two branch openings in moderate-income geographies.

ATM network distribution is accessible only to limited portions of the AA. The percentage of ATMs located in both low- and moderate-income geographies is below the percentage of the population residing in those geographies. Traditional banking services are augmented by the bank's Rapid Cash Program with strong usage evident in this MMSA. Use of this product benefits low- and moderate-income geographies, as 51% of the Rapid Cash transactions initiated in the AA originated in low- and moderate-income areas.

Refer to Table 15 in the "Multistate Metropolitan Areas" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## **Community Development Services**

Responsiveness to the CD service needs in the Chicago-Joliet-Naperville, IL full-scope area is good. The bank provides a relatively high level of CD services. The evaluation of CD services in this MMSA included services provided in the broader Illinois statewide area with potential to benefit this MMSA. Plentiful opportunities exist for the bank to work with organizations that target affordable housing and community development needs in low- and moderate-income areas. Hundreds of employees volunteered, partnering with the Center for Economic Progress, to prepare tax returns for low- or moderate-income taxpayers as part of the Volunteer Income Tax Assistance (VITA) program. Bank employees worked with more than 75 CD organizations and demonstrated leadership with employees holding over 100 board memberships during this evaluation period.

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

Based on limited-scope reviews, service test performance in the Gary MD and Lake County-Kenosha County MD is good and stronger than the performance in the MMSA overall, primarily because branch distribution revealed a higher level of retail service accessibility to low- and moderate-income areas. Performance in the limited-scope areas was not significant enough to impact the overall rating for the MMSA.

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



## State of Michigan

<b>CRA rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>Low Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors that support this rating include:

- Good lending activity and good distribution of loans to borrowers with different income levels helped to offset a poor distribution of loans within geographies of different income levels. Community development lending had a neutral impact.
- Excellent performance in the full-scope AA, based on qualified investment volume, was partially offset by weaker performance in the rest of the state, which resulted in an overall good level of performance.
- Service test performance in the full-scope area was adequate. Stronger performance in several of the limited-scope areas elevated the bank's overall performance in the state to a good level. Service test performance was the result of good branch distribution, adequate branch hours and record of opening and closing branches, and an adequate level of community development services.

## Description of Institution's Operations in the State

Chase is the largest banking financial institution in the state of Michigan. As of June 30, 2010, the bank held \$21.3 billion in deposits representing 13.7% of the market share in the entire state. The bank's primary competitors are Comerica Bank and PNC Bank, N.A. with deposit market shares of 13% and 10%, respectively. There are over 160 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top five banks accounting for nearly 55% of the entire market share. Chase operates over 300 branch offices and over 400 deposit taking ATMs within the state.

Chase has delineated 18 AAs in Michigan. The Detroit-Livonia-Dearborn MD comprises 51% of bank deposits in the state; as a result this area was selected for a full-scope review. The remaining AAs, including the combined non-metropolitan AAs, were analyzed using limited-scope procedures. Of the bank's 29 rating areas, Michigan ranks fifth and accounts for 4% of total bank deposits. As a result, the state is considered a primary rating area.

Refer to the market profiles for the state of Michigan in appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Michigan is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Detroit-Livonia-Dearborn MD is adequate. Performance in the limited-scope areas did not materially impact the lending test rating.

### Lending Activity

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

Lending activity is good. The bank has the largest deposit market share in the Detroit-Livonia-Dearborn MD. Lending market shares are well below the bank's deposit market share. We based our conclusion on rank and the overall substantial volume of loans generated. There is significant competition in the MD, particularly from national mortgage companies and business credit card banks that do not have a deposit presence in the MD. Chase achieved a fifth place rank for home purchase and third place rank for refinance lending among all lenders operating in the MD. The bank ranks nineteenth among all small business lenders. We noted that the top five business lenders are all credit card banks and control over 50% of the market. One of these five is the bank's credit card affiliate.

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

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

The distribution of loans within geographies of different income levels is poor. The overall geographic distribution of HMDA products was poor with good home improvement and adequate home purchase performance offset by poor home refinance distribution. The distribution of small business lending is good with good penetration into moderate-income geographies and only adequate performance in low-income tracts. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was good. Poverty is very high in Detroit at 23% compared to 16% for the state in 2010. We considered this as a barrier to mortgage lending and to the ability of residents to qualify for mortgage loans. With this considered, home improvement lending is excellent while the home purchase and refinance lending categories are good. Lending to businesses with different revenue sizes is adequate.

## **Community Development Lending**

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

Community development lending had a neutral impact on lending performance in the MD. The bank originated 19 community development loans totaling \$21 million during this evaluation period.

## **Product Innovation and Flexibility**

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

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

Performance in the limited-scope AAs did not have an impact on the overall rating for the state of Michigan. Based on limited-scope reviews, the bank's performance under the lending test in the Flint, Muskegon-Norton Shores, and Niles-Benton Harbor AAs is not inconsistent with the bank's overall adequate performance in the state of Michigan. In the Ann Arbor, Battle Creek, Grand Rapids-Wyoming, Holland-Grand Haven, Kalamazoo-Portage, Lansing-East Lansing, Saginaw-Saginaw Township North, Warren-Farmington Hills-Troy, and non-metropolitan AAs, the bank's performance is stronger than the bank's overall performance in the state. Four of the AAs had adequate geographic distribution with good borrower distribution performance. Three other AAs had adequate lending performance that was elevated to the good level because of an excellent volume of community development loans. One area had poor geographic performance with excellent borrower performance for an overall good rating. The Lansing and non-metropolitan AAs had good lending performance with an excellent volume of community development loans that elevated the performance to excellent. Refer to the Tables 1 through 12 in the state of Michigan section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

Investment test performance in Michigan is rated High Satisfactory. Based on a full-scope review, performance is excellent in the Detroit-Livonia-Dearborn MD. Performance in the limited-scope AAs negatively impacted the investment test rating for the state.

Refer to Table 14 of appendix D for the data used to evaluate the bank's level of qualified investments in the rating area.

Performance is excellent in the Detroit-Livonia-Dearborn MD based on the significant volume of investments. The bank funded 217 investments in the AA totaling \$93.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 79 prior period investments as of year-end 2010 was \$22.9 million. The bank's responsiveness to the

community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Detroit-Livonia-Dearborn MD totaled \$50.5 million which consisted of an investment in school building and site bonds for the School District of the City of Detroit. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Michigan, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 15 investments for \$12.1 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 73 investments with remaining balances totaling \$11.4 million in the broader statewide area with the potential to benefit the bank's AAs. These investments in the broader statewide area enhanced the bank's overall performance under the investment test for the state.

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

The overall performance in the limited-scope AAs negatively impacted the investment test rating for Michigan. Based on limited-scope reviews, investment test performance in the Battle Creek, Holland-Grand Haven, Kalamazoo-Portage, Muskegon-Norton Shores, and Niles-Benton Harbor MSAs is excellent and stronger than the overall High Satisfactory performance in Michigan. Stronger performance is centered in a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Grand Rapids-Wyoming, Lansing-East Lansing and Saginaw-Saginaw Township North MSAs is good and not inconsistent with the overall performance in Michigan. Performance in the Ann Arbor and Flint MSAs, the Warren- Troy-Farmington Hills MD, and the Michigan Non-MSA is adequate and weaker than the overall performance in Michigan. Weaker performance is based on a lower amount of qualified investments relative to the bank's operations in the AA. The AAs with weaker performance represent over 39% of the bank's deposits in the state. As a result, the weaker performance decreased the overall state performance to a good level. Refer to Table 14 of appendix D for the data used to evaluate the bank's level of qualified investments in the rating area.

## **SERVICE TEST**

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

The bank's performance under the service test in Michigan is rated High Satisfactory. Performance in the Detroit-Livonia-Dearborn MD is adequate. Performance in several of the limited-scope AAs had a positive impact on and helped to elevate the service test rating for Michigan.

## **Retail Banking Services**

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

The distribution of bank branches is adequate as services are reasonably accessible to all portions of the full-scope area. Branch distribution in the full-scope AA was initially considered poor. The distribution of branches in low- and moderate-income geographies is significantly below the percentage of the population residing in those areas and is poor and adequate respectively. However, with consideration given for 27 branches in middle- and upper-income geographies that are in close proximity to low- and moderate-income geographies; accessibility of services is considered adequate. The record of opening and closing branch offices has adversely affected the accessibility of delivery systems. During the evaluation period, one office closed in a low-income geography in the full-scope AA. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network does not augment the delivery of banking services to low- and moderate-income geographies or individuals. Traditional banking services are augmented by the bank's Rapid Cash funds transfers program. In the full-scope area, 79% of the Rapid Cash transactions originated from branches located in low- and moderate-income geographies.

## **Community Development Services**

The bank provided an adequate level of community development services in the full-scope area. Bank employees provided services to over 30 organizations focused on community development. Services included technical assistance to organizations and financial literacy and home ownership/mortgage instruction for low- and moderate-income residents. Activities included Mortgage Days held at various low- and moderate-income branches. Broader statewide activities with the potential to positively impact the AA were included in this evaluation. The bank partners with the state program to deliver unemployment Electronic Benefits Transfer benefits through a debit card. Employees held a number of leadership roles on boards and committees in service organizations. The area has significant economic and social needs including support for revitalization/stabilization of neighborhoods and ongoing foreclosure and financial literacy counseling.

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

Performance in several of the limited-scope AAs had a positive impact on and helped to elevate the service test rating for Michigan. Based on limited-scope reviews, the bank's service test performance in the Flint, Holland-Grand Haven, Niles-Benton Harbor, Warren-Troy-Farmington, and the non-metropolitan AAs is excellent and stronger than the performance for the state overall, primarily due to branch distribution. Performance in Kalamazoo-Portage AA is good and not inconsistent with the state rating. Performance in those areas rated excellent and good hold over 38% of the deposits in Michigan and had a positive impact on the state's overall service test rating. Performance in the Battle Creek, Grand Rapids-Wyoming, Lansing-East Lansing, Muskegon-Norton Shores, and Saginaw-Saginaw Township AAs is weaker than the good performance in the state overall, but still

considered adequate. Performance in the Ann Arbor AA is considered poor. Weaker performance as compared to the state overall is due to the lower number of branches in low- and moderate-income geographies as compared to the percentage of the population living in those areas. However, the limited-scope AAs with weaker performance combined hold a considerably lower percentage of total deposits in the state as compared to those areas with good or excellent performance. As a result, the performance in the lower-rated AAs did not significantly impact the overall rating for the state. Refer to Table 15 in the state of Michigan section of appendix D for the facts and data that support these conclusions.

## OTHER RATING AREAS

- Cincinnati-Middletown, OH-KY-IN Multistate MSA
- Louisville/Jefferson County, KY-IN Multistate MSA
- Portland-Vancouver-Hillsboro, OR-WA Multistate MSA
- Wheeling, WV-OH Multistate MSA
- State of Arizona
- State of Colorado
- State of Connecticut
- State of Florida
- State of Georgia
- State of Idaho
- State of Illinois
- State of Indiana
- State of Kentucky
- State of Louisiana
- State of Nevada
- State of New Jersey
- State of New York
- State of Ohio
- State of Oklahoma
- State of Oregon
- State of Utah
- State of Washington
- State of West Virginia
- State of Wisconsin

## Cincinnati-Middletown, OH-KY-IN Multistate Metropolitan Statistical Area

CRA rating for the rating area<sup>3</sup>: Outstanding  
 The lending test is rated: Outstanding  
 The investment test is rated: Outstanding  
 The service test is rated: Low Satisfactory

The major factors that support this rating include:

- Excellent volume of community development lending helped elevate otherwise good lending performance to an excellent level. The distribution of loans to borrowers of different income levels was good and lending activity was excellent, which elevated an adequate performance in the distribution of loans within geographies of different income levels.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Adequate performance under the service test resulted from an adequate distribution of branches and ATMs; good service hours and record of opening and closing branches and an adequate record of community development service.

### Description of Institution's Operations in the Rating Area

The bank's AA consists of seven of the 12 counties in the MMSA. It is comprised of Butler, Clermont, Hamilton, and Warren Counties in Ohio and Boone, Campbell, and Kenton Counties in Kentucky. As of June 30, 2010, the bank had \$1.1 billion of deposits in this geographic area. In terms of deposit market share, Chase ranks seventh with a 2% share compared to a 30.2% share held by the largest deposit holder, 2.1% held by the sixth and 1.7% share held by the eighth largest deposit holders. There are 81 FDIC-insured depository institutions in the AA, but the market is fairly concentrated with the two largest banks holding nearly 60% of the AA's deposits.

Within this rating area, the bank operates 31 branches and 36 deposit taking ATMs. This rating area represents 0.2% of the banks' overall deposits. As such, performance in this rating area had a minimal impact on the bank's overall CRA rating.

### LENDING TEST

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

The bank's performance under the lending test in the Cincinnati multistate metropolitan area is rated Outstanding.

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<sup>3</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.



## **Lending Activity**

Refer to Tables 1 Lending Volume and 1 Other in the “Multistate Other” section of appendix D for the facts and data used to evaluate the bank’s lending activity.

Lending activity is excellent. The bank originated an excellent level of home mortgage and home refinance loans in the AA where a very large number of financial institutions compete for home mortgage loans. A large number of the financial institutions making mortgage loans have no deposit taking facilities in the AA. The bank originated a good level of loans to small businesses. Strong competition comes from large regional lenders for small business lending. Chase’s affiliate bank is one of the top five lenders of small loans to businesses, which made it a significant performance context matter in arriving at our conclusion.

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

Refer to Tables 2 through 7 in the Multistate Other section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s loan originations and purchases.

The distribution of loans within geographies of different income levels was adequate. By product, home purchase was adequate within both low- and moderate-income geographies; home improvement lending was excellent, in both low- and moderate-income geographies; and refinance lending was adequate. Small business lending was good with excellent performance in moderate-income geographies offset by good performance in low-income census tracts. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

Refer to Tables 8 through 12 in the Multistate Other section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s loan originations and purchases.

The distribution of loans to borrowers of different income levels was good. Excellent performance for home lending and home improvement lending with good performance in home refinance lending was negatively impacted by poor small business performance.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the Multistate Other section of appendix D for the facts and data used to evaluate the bank’s level of community development lending.

The bank originated an excellent volume of community development lending within the AA with seven loans totaling \$38.6 million. The dollar volume of community development lending, representing 29% of Tier 1 Capital allocated to the AA, had a significant, positive impact on the lending test rating for the AA. Most loans served affordable housing purposes and revitalization/stabilization of low- and moderate-income neighborhoods within the AA. There are numerous opportunities available in the AA, with a wide range of community development organizations and needs. One example of a project, which was highly responsive to an identified need, was a \$4.2 million term loan to acquire a 90-unit apartment complex located in Cincinnati, Ohio. The property operates under the Section 42 LIHTC program, which requires

that 100% of the units be rented to tenants earning no more than 60% of the area median income.

## **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in the Cincinnati-Middletown, OH-KY-IN MSA is rated Outstanding. Based on a full-scope review, the bank's performance in the area is excellent.

Refer to Table 14 in the "Multistate Other MSAs" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on the significant volume of investments, performance in the rating area is excellent. JPMCB funded 60 investments in the MSA totaling \$25.0 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 20 prior period investments as of year-end 2010 was \$7.7 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing. The largest investment in the Cincinnati-Middletown, OH-KY-IN MSA totaled \$8.5 million which consisted of LIHTC for the purpose of renovating and preserving affordable housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing community services.

## **SERVICE TEST**

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

The bank's performance under the service test in Cincinnati-Middleton MMSA is rated Low Satisfactory. Based on a full-scope review, the bank's performance is adequate.

## **Retail Banking Services**

Refer to Table 15 in the "Multistate Other MSAs" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The distribution of bank branches and ATMs is adequate, and retail delivery systems are reasonably accessible to essentially all portions of the AA. The percentage of branches located in moderate-income geographies exceeds the percentage of moderate-income population residing in these geographies. The lack of branches in low-income geographies

was considered in the conclusions. Branches in middle- and upper-income geographies are in close proximity to three low- and six moderate-income geographies. The record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the AA. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies.

### **Community Development Services**

The bank provides an adequate level of community development services to this AA. Homeownership preservation is an identified need and was a focus of numerous activities. Employees provided services through seven different community development organizations and served in leadership roles for many of them. Many community development organizations exist throughout the AA and significant opportunities to participate in CD activities are available.

## Louisville/Jefferson County, KY-IN Multistate MSA

CRA rating for the rating area<sup>4</sup>: Outstanding  
 The lending test is rated: Outstanding  
 The investment test is rated: Outstanding  
 The service test is rated: Outstanding

The major factors that support this rating include:

- Excellent volumes of community development lending elevated an otherwise good lending performance to the excellent level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Excellent service test performance is evident in the excellent distribution and accessibility of branches and ATMs and an excellent level of community service. Moreover, business hours are good.

### Description of Institution's Operations in the Rating Area

The bank's AA consists of six of the 13 counties in the MMSA. It is comprised of Clark, Floyd, and Harrison Counties in Indiana and Jefferson, Oldham, and Shelby Counties in Kentucky. As of June 30, 2010, the bank had \$3 billion in deposits in this geographic area. In terms of deposit market share, Chase ranks second with a 13.3% share compared to a 22.4% share held by the largest deposit holder and a 9.7% share held by third largest deposit holder. There are 46 FDIC-insured depository institutions in the AA, but the market is fairly concentrated with the six largest banks holding 64.8% of the deposits in the AA.

In this AA, the bank operates 44 branches and 50 deposit taking ATMs. This AA contains 0.6% of the bank's overall deposits. As such, performance in the AA had a minimal impact on the bank's overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in the Louisville multistate metropolitan area is rated Outstanding, based significantly upon the volume of community development lending.

### Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the "Multistate Other MSAs" section of appendix D for the facts and data used to evaluate the bank's lending activity.

<sup>4</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Lending activity is excellent. The bank was the leading originator of home purchase loans among financial institutions with deposit market share in the AA. The bank ranked sixth and eighteenth, respectively, in origination of refinance loans and home improvement loans. There is strong competition for small business loans. The top five small business lenders are credit card banks that control 71% of the market. While Chase is ranked eighteenth, the bank's own credit card affiliate is one of the leading lenders of small loans to business and is ranked third in market share.

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

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

The distribution of loans to geographies of different income levels is adequate. Excellent performance for small business lending is impacted by adequate performance for HMDA related products. By product, home purchase lending is poor; home improvement lending and refinance lending is adequate. Even considering the somewhat limited supply of owner-occupied housing in low-income census tracts, performance is very poor in those tracts for home purchase loan products. Because of the greater volume of owner-occupied housing in moderate-income tracts, we placed more weight on performance in those tracts. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels is good. Excellent performance for home purchase and home improvement lending was negatively impacted by poor performance for small business lending. Home refinance lending was good.

### **Community Development Lending**

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

Community development lending had a significant, positive impact on the lending test rating for the AA. The bank made 17 community development loans totaling over \$40 million. This volume represents 12% of Tier 1 Capital allocated to the AA.

### **Other Loan Data**

Chase provided for consideration one standby letter of credit totaling \$11.2 million that has a qualified community development purpose. Refer to Table 1 Other in the "Multistate Other" (Louisville) section of appendix D for facts and data on this letter of credit.

## **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in the Louisville/Jefferson County MSA is rated Outstanding. Based on a full-scope review, the bank's performance in the AA is excellent.

Refer to Table 14 in the "Multistate Other MSAs" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on the significant volume of investments, performance in the rating area is excellent. JPMCB funded 66 investments in the MSA totaling \$20.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 10 prior period investments as of year-end 2010 was \$5.5 million. Additionally, approximately \$1.7 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The two largest investments in the Louisville/Jefferson County, KY-INI MSA totaled \$13.1 million which consisted of LIHTC for the purpose of creating affordable housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing community services.

## **SERVICE TEST**

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

The bank's performance under the service test in the Louisville MMSA is rated Outstanding. Based on a full-scope review, the bank's performance in the AA is excellent. The branch and ATM distribution provides an excellent level of accessibility to all portions of the rating area. The bank is a leader in providing community development services to the low- and moderate-income neighborhoods in the service area.

## **Retail Banking Services**

Refer to Table 15 in the "Multistate Other MSAs" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's performance within the MMSA is rated Outstanding. A full-scope review of the Louisville-Jefferson County MSA revealed an excellent level of performance. Branch distribution within the AA is excellent as retail delivery systems are readily accessible to all portions of the AA. The percentage of branches in the low-income geographies is significantly above the percentage of low-income populations residing in these geographies. Services and business hours are good and do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network provides further deposit support for low- and moderate-income geographies or individuals.

### **Community Development Services**

Chase is a leader in providing community development services in this rating area, reflecting an excellent level of performance. Employees worked with and through numerous community development and neighborhood revitalization organizations and conducted seminars for homeownership and financial literacy in low- and moderate-income neighborhoods. Bank employees demonstrated leadership by serving on 20 boards or supporting committees of NFP groups.

## Portland-Vancouver-Hillsboro, OR-WA Multistate MSA

CRA rating for the rating area<sup>5</sup>: 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 volumes of community development lending elevated an otherwise good lending performance to the excellent level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Good service test performance is supported by an excellent distribution of branches and ATMs and good hours of service; however, the level of community development services provided is considered poor.

### Description of Institution's Operations in Rating Area

The bank's AA consists of the entire multistate MSA. The MMSA is a new rating area for the bank as a result of its purchase from the FDIC of certain assets of WaMu, which failed in 2008.

As of June 30, 2010, the bank had \$3.1 billion of deposits in this rating area. In terms of deposit market share, the bank ranks fourth with a 9.3% share compared to a 21.5% share held by the largest deposit holder and a 7.2% share held by fifth largest deposit holder. There are 40 FDIC-insured depository institutions in the AA, but the market is fairly concentrated with the four largest banks holding over 50% of the deposits in the AA. In this AA, the bank operates over 70 branches and over 100 deposit taking ATMs. In this multistate rating area, 67 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. This AA contains 0.6% of the bank's overall deposits. As such, performance in the AA had a minimal impact on the bank's overall CRA rating.

### LENDING TEST

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

The bank's performance under the lending test in the Portland multistate metropolitan area is rated Outstanding, based significantly upon the volume of community development lending.

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<sup>5</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.



## **Lending Activity**

Refer to Tables 1 Lending Volume and 1 Other in the “Multistate Other MSAs” section of appendix D for the facts and data used to evaluate the bank’s lending activity.

Lending activity in the Portland-Vancouver-Hillsboro MSA is excellent. Ranked fourth in deposit market share, the bank also ranks fourth in market share for home purchase, fifth for home improvement, and third for home refinance loans among local deposit taking institutions and national lenders within the MSA. In addition, the bank’s small business lending market share rank for deposit taking institutions is twenty-fourth, which is considered adequate with much competition and credit cards lenders taking 68% of the market share.

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

Refer to Tables 2 through 7 in the “Multistate Other” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s loan originations and purchases.

The distribution of loans within geographies of different income levels was adequate. Small business lending was good based on adequate lending performance in the low- and moderate-income geographies, but excellent market share performance. Home purchase, home refinance and home improvement lending were all adequate. The bank had excellent performance in multi-family lending in both low- and moderate-income geographies. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

Refer to Tables 8 through 12 in the “Multistate Other” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. The performance for all HMDA related products and small business lending was good.

## **Community Development Lending**

Refer to Table 1 Lending Volume in the “Multistate Other” section of appendix D for the facts and data used to evaluate the bank’s level of community development lending.

Community development lending had a significant, positive impact on the lending test rating for the AA. The bank originated 118 community development loans, which totaled \$182.7 million or 52.1% of Tier 1 Capital allocated to the AA. The substantial majority of the loans addressed affordable housing needs. To illustrate, JPMCB provided permanent loan financing amounting to \$20 million for 234 LMI units of affordable housing. This complex is viewed as the largest affordable housing project in Oregon with 100% of the units under a Section 8 contract.

## **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

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

The bank's performance under the investment test in the Portland multistate metropolitan area is rated Outstanding. Based on a full-scope review, the bank's performance in the AA is excellent.

Refer to Table 14 in the "Multistate Other" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on the significant volume of investments, performance in the rating area is excellent. Chase funded 77 investments in the MSA totaling \$35.9 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 50 prior period investments as of year-end 2010 was \$9.7 million. Additionally, approximately \$5.1 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The largest investment in the Portland-Vancouver-Hillsboro, OR-WA MSA totaled \$6.9 million which consisted of LIHTC for the purpose of creating affordable housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing community services.

## **SERVICE TEST**

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

The bank's performance under the service test in the Portland MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the AA is good. This is based on readily available access to banking services for all portions of the AA. However, the record of community development services is poor.

### **Retail Banking Services**

Refer to Table 15 in the "Multistate Other" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's performance is rated High Satisfactory, reflecting a good performance in the rating area. Branch distribution in the moderate-income geographies is excellent and services are

readily accessible to all portions of the AA, especially the low- and moderate-income geographies. The record of opening and closing branch offices has not adversely affected the accessibility of delivery systems in the AA. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network provides access for low- and moderate-income geographies or individuals.

### **Community Development Services**

The bank's record of responsiveness to the need for community development services is poor. Chase entered this market in September of 2008 when they purchased certain WaMu assets and liabilities from the FDIC; therefore, the evaluation period is shortened. Chase reported only 47 community development service events with 36 being "mortgage days" at low- and moderate-income area branches. Identified needs include affordable rental housing, financial literacy, job training, non-profit/small business assistance, and financing for economic development projects. Minimal services offered by the bank targeted affordable housing needs. Employee leadership participation on boards or committees was low and revitalization/stabilization efforts were nominal.

Refer to Table 15 in the "Multistate Other" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## Wheeling, WV-OH Multistate MSA

CRA rating for the rating area<sup>6</sup>: **Satisfactory**  
 The lending test is rated: **High Satisfactory**  
 The investment test is rated: **High Satisfactory**  
 The service test is rated: **High Satisfactory**

The major factors that support this rating include:

- Excellent lending activity strengthens good distribution of loans to borrowers with different income levels and adequate distribution of loans within geographies of different income levels.
- Good responsiveness to the community development needs of the rating area based on qualified investment volume.
- A good distribution of branches, good hours of service, and an adequate record of community development service, given the limited community development opportunities in the area.

### Description of Institution's Operations in the Rating Area

The bank's AA includes all three counties in the MMSA. It is comprised of a part of Marshall County and all of Ohio County in West Virginia and a part of Belmont County in Ohio. As of June 30, 2010, the bank had \$133.1 million of deposits in this AA. Chase ranks ninth in deposit market share with 4.5%. This compares to a 36% share held by the largest deposit holder. There are 15 FDIC-insured depository institutions in the rating area, but the market is fairly concentrated with the two largest banks holding over 49% of the deposits. Within this rating area, the bank operates five branches and four deposit taking ATMs. This AA contains 0.02% of the bank's overall deposits. As such, performance in the MMSA had a minimal impact on the bank's overall CRA rating.

### LENDING TEST

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

The bank's performance under the lending test in the Wheeling multistate metropolitan area is rated High Satisfactory.

#### Lending Activity

Refer to Tables 1 Lending Volume and 1 Other in the "Multistate Other" section of appendix D for the facts and data used to evaluate the bank's lending activity.

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<sup>6</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan area.

Lending activity is excellent. The bank is ranked second in home purchase origination and eighth in refinance loans, which is excellent based on the bank's ninth place ranking in market share among deposit taking financial institutions in the Wheeling MMSA. The bank originated an excellent volume of small loans to businesses based on the strong competition by national credit card companies. The bank and its credit card affiliate, when combined, are a leading lender of small loans to businesses.

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

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

The distribution of loans within geographies of different income levels is adequate. For the HMDA products, home purchase and home refinance lending was adequate. We did not consider home improvement lending because of the low number of loans made during the evaluation period. Lending to small businesses was good. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

Refer to Tables 8 through 12 in the "Multistate Other" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers of different income levels is good. As previously stated, we did not evaluate home improvement lending in the MMSA. Excellent performance for home purchase was negatively impacted by adequate performance for home refinance and small business lending.

### **Community Development Lending**

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

Community development lending had a neutral impact on lending performance. The bank did not originate any community development loans in this AA. Contacts describe opportunities as scarce in the Wheeling MMSA.

### **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

The bank's performance under the investment test in the Wheeling, WV-OH MSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the area is good.

Refer to Table 14 in the "Multistate Other" section of appendix D for the facts and data used to evaluate the bank's level of qualified investments.

Based on the significant volume of investments, performance in the rating area is good. JPMCB funded three investments in the MSA totaling \$86 thousand. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on six prior period investments as of year-end 2010 was \$0.5 million. The bank's responsiveness to the community development needs in the AA is adequate, with the majority of investments related to affordable housing. The investments in the Wheeling, WV-OH MSA totaled \$0.5 million which consisted of LIHTC for the purpose of providing affordable housing. Other investments consisted of investments in affordable housing and contributions to local and regional organizations providing community services.

## **SERVICE TEST**

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

The bank's performance under the service test in the Wheeling MMSA is rated High Satisfactory. Based on a full-scope review, the bank's performance in the AA is good. The bank provides good retail and adequate community development services in this MMSA, given the composition of the market area and the bank's limited presence.

### **Retail Banking Services**

Refer to Table 15 in the "Multistate Other" section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's performance is rated High Satisfactory, reflecting a good level of performance. Branch distribution is good, as services are accessible to geographies and individuals of different income levels in the AA. The bank operates five branches in this MMSA; three of these branches are located in moderate-income geographies. There are no branches in low-income census tracts in the AA. However, after considering branches near to low-income geographies, service delivery available to the population living in low-income census tracts is considered adequate. There were no significant changes in branch locations. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network provides adequate access for low- and moderate-income geographies or individuals.

## **Community Development Services**

Chase provides an adequate level of community development services in this AA. The bank reported only five activities, such as “mortgage days” held at a branch office in a moderate-income area, and the provision of electronic benefits for public assistance and child support payments. There is no strong community development infrastructure in place. As such, the opportunity to partner with community development organizations is limited.

Refer to Table 15 in the “Multistate Other” Wheeling section of appendix D for the facts and data used to evaluate the distribution of the bank’s branch delivery system and branch openings and closings.

## State of Arizona

CRA Rating for the rating area:	<u>Outstanding</u>
The lending test is rated:	<u>Outstanding</u>
The investment test is rated:	<u>Outstanding</u>
The service test is rated:	<u>High Satisfactory</u>

The major factors supporting the ratings include

- Significantly positive community development lending raised an adequate distribution of loans within geographies of different income levels and a good distribution of loans to borrowers with different revenues to an excellent rating. In addition, the bank had excellent lending activity.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments, including unfunded commitments to invest. A significant volume of unfunded commitments for affordable housing investments elevated the investment test rating for this state.
- A good distribution of branches, after considering the improved access by the branches in middle- or upper-income tracts that are near to low- or moderate-income tracts. ATM distribution and hours of service are good; the record of community development services is adequate.

## Description of Institution's Operations in the State

The bank has 12 AAs within the state. Six are in MSAs, with the remaining AAs are in non-metropolitan areas. Within Arizona, 74.3% of the bank's deposits are concentrated in the Phoenix-Mesa-Glendale MSA; therefore, this area was selected for a full-scope review. The remaining MSAs and combined non-metropolitan AAs were analyzed using limited-scope procedures.

Statewide, the bank holds \$19.2 billion in deposits, which represents 3.6% of the bank's total deposits. Among over 80 FDIC-insured depository institutions, the bank holds the second-highest amount of deposits in the state with over 22% of the market share. The deposit market in the rating area is fairly concentrated, with the three largest banks holding over 67% of the deposits. Chase operates nearly 300 branches and over 500 deposit taking ATMs in Arizona. For this state rating area, 40 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Arizona is rated Outstanding. Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Scottsdale, AZ MSA is excellent. This conclusion is based on significantly positive community development lending



and excellent lending activity. Performance in the limited-scope areas did not affect the lending test rating in the state.

## **Lending Activity**

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

Lending activity is excellent. The bank has the second largest volume of deposits in the Phoenix-Mesa-Scottsdale MSA. While lending market shares and ranks are below the bank's deposit shares and rank, this is reflective of the strong competition in the MSA. Chase ranks among the top six for mortgage related loans. Nationally based credit card banks dominate the small business loan market. When considering only those that have deposit taking facilities in the MSA, the bank ranks sixth.

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

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

The distribution of loans within geographies with different income levels is adequate. Small business lending and multi-family lending in this MSA is excellent. Home purchase lending performance was considered adequate, home improvement lending was good and home refinance lending was poor. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different incomes is good. HMDA related products demonstrated good performance. Excellent home purchase was offset by good home refinance and home improvement performance. The distribution of loans to businesses with different revenue sizes is good.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance. The bank originated 45 community development loans in the Phoenix-Mesa-Scottsdale MSA, which totaled \$221.5 million or 13.7% of Tier 1 Capital, allocated to the AA.

## **Other Loan Data**

Chase provided for consideration one standby letter of credit totaling \$6.2 million that has a qualified community development purpose. Refer to Table 1 Other in the state of Arizona section of appendix D for facts and data on this letter of credit.

## **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Phoenix-Mesa-Scottsdale AA, the bank made over 15,000 mortgage loans under various flexible mortgage programs.

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

Performance in the limited-scope areas was not significant enough to have an impact on the overall rating for the state of Arizona. Based on the limited-scope reviews in the Lake Havasu City-Kingman MSA, Prescott MSA, Tucson MSA, Yuma MSAs, and non-metropolitan areas, the bank's performance was weaker than the overall excellent performance in the state, but was still considered good. The weaker performance was primarily caused by weaker geographic distribution or weaker borrower distribution. Each of these areas contributed significantly positive or positive community development lending to raise the ratings. In the Flagstaff MSA, the bank's performance was weaker than the bank's overall excellent performance in the state, but still considered adequate. There was no community development lending to help increase the rating. Refer to the Tables 1 through 12 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Arizona is rated Outstanding. Based on a full-scope review, performance in the Phoenix-Mesa- Glendale MSA is excellent. The significant volume of unfunded commitments for affordable housing projects elevated the investment test rating in the Phoenix AA. Moreover, a significant volume of broader statewide and regional area investments with the potential to benefit the AAs in the state further supports the excellent performance. Performance in the limited-scope AAs did not materially impact the investment rating for the state.

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

The bank demonstrated an excellent level of performance in the Phoenix AA based on the combined volume of current period investments and unfunded commitments. JPMCB funded 262 investments in the Phoenix-Mesa-Glendale MSA totaling \$35.6 million. An additional \$34 million in legally-binding, unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. This significant volume of investment commitments to affordable housing demonstrates the bank's efforts in addressing the community development needs of the area and elevated the investment test performance. We also considered the ongoing

impact which investments made prior to the current evaluation period had within the AA. The remaining balance on 25 investments as of year-end 2010 was \$19.1 million. The largest investment in the Phoenix-Mesa- Glendale MSA totaled \$3.7 million which consisted of LIHTC for affordable housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing community services.

Investments in the broader statewide and regional areas further support the bank's overall performance under the investment test for the state. The bank made investments and grants to organizations and funds throughout the state of Arizona and in a broader regional area around Arizona, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 18 investments for \$13.5 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made three investments with remaining balances totaling \$0.2 million in the broader statewide area with the potential to benefit the bank's AAs. In the current evaluation period, the bank made 32 investments for \$166.8 million in the broader regional area with the potential to benefit the bank's AAs.

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

Performance in limited-scope AAs did not significantly impact the investment test rating for Arizona. Based on limited-scope reviews, the bank's performance under the investment test in the Prescott and Arizona Non-MSA AAs is not inconsistent with the overall excellent performance in Arizona. Performance in the Lake Havasu City-Kingman and Tucson AAs is adequate, but weaker than the overall performance in Arizona. Performance in the Flagstaff and Yuma AAs is poor and significantly weaker than the overall performance in Arizona. Weaker performance is due to a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Arizona is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Phoenix-Mesa-Glendale AA is good. Chase's performance in the limited-scope AAs in Arizona favorably impacted the overall service test rating.

### **Retail Banking Services**

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

After considering the improved access from the branches in middle- or upper-income tracts that are near to low- or moderate-income tracts, there is a good distribution of branches in the Phoenix AA. Branch delivery systems are reasonably accessible to essentially all portions the

AA. Branches acquired as part of the WaMu transaction gave access to Chase products and services to people living in moderate-income geographies. The record of opening branch offices has improved the accessibility of delivery systems particularly in low- and moderate-income geographies. The bank opened six branches and closed one branch in moderate-income geographies. Branch hours do not vary in a way that inconveniences certain portions of the AA. The ATM network is well distributed and provides additional delivery accessibility to all portions of the including low- and moderate-income geographies and individuals.

### **Community Development Services**

The bank provides an adequate level of community development services in the full-scope area. This evaluation included community service activities provided across Arizona with the potential to benefit this MSA. The quality of community development services declined with leadership or board positions down by more than 50% from the previous evaluation period.

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

Based on limited-scope reviews, service test performance in the Prescott, Tucson, Yuma and the non-metropolitan AAs is stronger than the performance for the state overall and is considered excellent. This stronger performance is primarily due to excellent branch distribution. Performance in the Flagstaff and Lake Havasu City-Kingman MSAs is adequate and weaker than the good performance in state overall. Refer to Table 15 in the state of Arizona section of appendix D for the facts and data that support these conclusions.

## State of Colorado

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors supporting the ratings include

- Excellent volume of community development lending elevated an otherwise good lending performance to the excellent level. The bank had good geographic and borrower distributions as well as excellent lending activity.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Good branch and ATM distribution and good service hours, combined with an adequate record of community service.

### Description of Institution's Operations in the Rating Area

The bank has five AAs within the state, all of which are in MSAs. Within Colorado, 72.7% of the bank's deposits are concentrated in the Denver-Aurora-Broomfield AA, and as such, this area received a full-scope review. The remaining AAs were analyzed using limited-scope procedures.

The bank has 7.9% of the deposit market share, which is third highest in the state. There are 190 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top three banks accounting for 38% of the entire market share. Chase operates over 100 branches and over 160 deposit taking ATMs in Colorado. For this state rating area, 26 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. Statewide, the bank holds \$7.2 billion of deposits, which represents 1.4% of the bank's total deposits. As a result, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Colorado is rated Outstanding. Based on a full-scope review, the bank's performance in the Denver-Aurora AA is excellent especially considering excellent community development lending and lending activity. Performance in the limited-scope AAs did not impact the lending test rating for the state.

## **Lending Activity**

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

Lending activity is excellent. There are over 80 deposit taking institutions in the AA with Chase ranked number three. Contrast this with over 500 mortgage lenders and over 140 small business lenders. Despite this intense loan competition, the bank was ranked sixth, eighth and fourth for home purchase, home improvement and home purchase lending, respectively. The bank ranked twenty-first for small business lending, but consideration was given to the fact that national credit card lenders dominate 73% of the market share. In light of the strong competition in the AA, we based our conclusions on rank and the large volume of loans generated.

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

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

The distribution of loans within geographies of different income levels is good. HMDA related lending was good. Performance for the HMDA products was excellent within the low-income geographies and adequate to poor in the moderate-income geographies. Multi-family lending was excellent in both low- and moderate-income geographies. Small business lending was excellent. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels is good. Performance for home purchase lending was excellent for moderate-income borrowers and good for home improvement and home refinance lending. Performance was not as strong for low-income borrowers in all three HMDA products, even with poverty levels considered. This had a negative impact on our conclusions for these products. By product, home purchase and home improvement were both good. Home refinance was adequate. The performance to businesses with different revenues levels was adequate.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance. The bank originated 83 community development loans totaling \$114 million. The substantial majority of loans addressed affordable housing needs in the AA. This sizable loan volume

represents 19% of allocated Tier 1 Capital and shows excellent responsiveness to identified community needs.

In addition to community development loans in the full- and limited-scope AAs, the bank originated community development loans in the broader statewide areas in Colorado. The bank made seven loans totaling over \$63 million. These loans further demonstrate a commitment to provide needed community development assistance throughout the state. These loans were given positive consideration in arriving at our lending test rating for the state.

### **Other Loan Data**

Chase provided for consideration two standby letters of credit totaling \$4.9 million that have a qualified community development purpose. Refer to Table 1 Other in the state of Colorado section of appendix D for facts and data on these letters of credit.

### **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Denver-Aurora AA, the bank made nearly 7,000 mortgage loans under various flexible mortgage programs.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Boulder and Fort Collins AAs is not inconsistent with the bank's overall excellent performance under the lending test in the state of Colorado. In the Colorado Springs MSA, the bank's performance is weaker than the bank's overall performance in the state but is still considered good. The Colorado Springs MSA had adequate performance in geographic distribution of loans, which negatively impacted the AAs' total performance. The bank's performance in the Greeley MSA is weaker than the bank's overall performance in the state, but considered adequate. The Greeley MSA did not benefit from the significant volume of community development lending that helped elevate the lending test conclusion for the other AAs. Performance in these areas was not significant enough to have an impact on the overall rating for the state of Colorado. Refer to the Tables 1 through 12 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Colorado is rated Outstanding. Based on a full-scope review, performance in the Denver-Aurora AA is excellent. Performance in the limited-scope AAs did not impact the investment test rating for the state.

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

Based on the significant volume of investments, performance in the Denver AA is excellent. JPMCB funded 140 investments in the MSA totaling \$59.4 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 32 prior period investments as of year-end 2010 was \$25.8 million. Additionally, approximately \$8.6 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area.

The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing. The largest investment in the Denver-Aurora MSA totaled \$11.5 million which consisted of a direct investment in LIHTC. Other investments consisted primarily of investments and contributions to affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Colorado and in a broader regional area around Colorado, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 16 investments for \$3.0 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 23 investments with remaining balances totaling \$3.2 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made six investments for \$3.7 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 18 investments with remaining balances totaling \$5.0 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Boulder, Colorado Springs, and Fort Collins-Loveland MSAs is not inconsistent with the overall excellent performance in Colorado. Performance in the Greeley MSA is adequate and weaker than the overall performance in Colorado. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not significantly impact the investment test rating for Colorado. Refer to the Table 14 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Colorado is rated High Satisfactory. A full-scope review of the Denver-Aurora AA determined the bank provides a good level of retail services and an adequate level of community development services.



## **Retail Banking Services**

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

The distribution of bank branches in the Denver-Aurora AA is good. Services are accessible to essentially all portions of the AA. There are no branches in low-income geographies in this AA; however, after giving consideration to branches in middle- and upper-income census tracts that are within one-half mile from a low- or moderate-income census tract, accessibility improves and is good for both low- and moderate-income census tracts. The record of branch openings and closings improved the accessibility of delivery services as the bank opened a net of six branches in the Denver AA. The ATM network offers good access to deposit taking ATMs in low- and moderate-income census tracts. Traditional banking services are augmented by the bank's Rapid Cash Program. Use of this product benefits low- and moderate-income geographies, as 65% of the Rapid Cash transactions initiated in the state originated in low- and moderate-income areas.

## **Community Development Services**

Responsiveness to community development service needs in the Denver-Aurora AA is adequate. The evaluation of community development services for this MSA included the broader statewide services with potential to benefit this AA. Colorado is one of the top ten foreclosure states with a continued need for foreclosure prevention assistance. The majority of the community development services consisted of board leadership with various organizations which serve low- to moderate-income communities. Other services target financial education, EBT debit card distribution services for qualified low- and moderate-income families and individuals, and technical assistance.

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

Based on limited-scope reviews, the bank's performance under the service test in the Fort Collins-Loveland AAs is not inconsistent with the bank's overall good performance under the service test in Colorado. In the Greeley AA, the bank's performance is stronger than the bank's overall performance in the state. This performance is due primarily to branch distribution having a higher penetration of low- and moderate-income geographies. In the Boulder and Colorado Springs AAs, the bank's performance is weaker than the bank's overall performance in the state primarily due to branch distribution having a lower penetration of low- and moderate-income geographies. Performance in the combined limited-scope areas had no significant impact on the overall rating for the state of Colorado. Refer to Table 15 in the state of Colorado section of appendix D for the facts and data that support these conclusions.

## State of Connecticut

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Low Satisfactory</u></b>

The major factors supporting the ratings include:

- Excellent volume of community development lending elevated an otherwise good lending performance to the excellent level. The bank had good geographic distributions and adequate borrower distributions with excellent lending activity.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Adequate service test performance is driven by a good distribution of ATMs when balanced with a poor distribution of branches. The hours of service and record of community service are good, while record of opening and closing branches is adequate.

### Description of Institution's Operations in the Rating Area

There are two AAs within the state, both in an MSA. Within Connecticut, 94.8% of the bank's deposits are concentrated in the Bridgeport-Stamford-Norwalk MSA; therefore, it was selected for a full-scope review. The remaining MSA was analyzed using limited-scope procedures.

Chase operates nearly 50 branches and over 70 deposit taking ATMs in Connecticut. For this state rating area, 7 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. The bank has 4% of the deposit market share, which is seventh highest in the state. There are over 60 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top three banks accounting for 44% of the entire market share. Statewide, the bank holds \$3.8 billion of deposits, which represents 0.7% of the bank's total deposits. As a result, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Connecticut is rated Outstanding. Based on a full-scope review, the bank's performance in the Bridgeport-Stamford-Norwalk AA is excellent. This conclusion is significantly based on the excellent community development lending and the excellent lending activity. Performance in the limited-scope area did not impact the lending test rating for Connecticut.

## **Lending Activity**

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

Lending activity is excellent. The bank originated a high volume of home purchase loans, refinance loans, and small loans to businesses. The bank originated a good volume of home improvement loans. Strong competition in the area of home improvement loans comes from large mortgage companies and large commercial banks. The bank ranked fourth, eighth, third and eleventh in home purchase, home improvement, home refinance and small business lending respectively.

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

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

The distribution of loans within geographies of different income levels is good. The distribution for home purchase, home improvement and multi-family lending reflects excellent performance in both low- and moderate-income geographies. Home refinance lending has adequate performance in both low- and moderate-income geographies. Chase had excellent distribution of small loans to businesses in low-income census tracts and good distribution within moderate-income census tracts. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different income levels was adequate. The home purchase lending had good performance with adequate performance for home improvement and home-refinance lending. The HMDA products had excellent and good distribution to moderate-income borrowers that was offset by weaker performance to low-income borrowers. The conclusion for the HMDA products stands, even considering the impact that poverty levels of 9% had on performance. Loans to businesses with different income levels were poor. The economic downturn had a negative effect on small businesses causing many businesses to close in all areas as well as the low- and moderate-income areas.

## **Community Development Lending**

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

Community development had a significant, positive impact on lending test performance in the full-scope area. The bank made 34 community development loans totaling over \$100 million in

the Bridgeport-Stamford-Norwalk MSA. The volume of loans represents 24.3% of Tier 1 Capital allocated to the AA.

### **Other Loan Data**

Chase provided for consideration two standby letters of credit totaling \$494 thousand that facilitated the creation of affordable housing. Refer to Table 1 Other in the state of Connecticut section of appendix D for facts and data on these letters of credit.

### **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on performance in the full-scope area. The bank provided information on flexible loan programs in the full-scope AA, which indicated a limited volume of loan originations with flexible features.

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

Based on a limited-scope review, the bank's performance under the lending test in the New Haven-Milford MSA is not inconsistent with the bank's excellent performance in the state. In this AA, good overall lending performance was greatly enhanced by a very positive level of community development lending and the reason for elevating the conclusion to the excellent level. Performance in this area was not significant enough to impact the overall lending test rating for the state of Connecticut. Refer to the Tables 1 through 12 in the state of Connecticut section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Connecticut is rated Outstanding. Based on a full-scope review, performance in the Bridgeport-Stamford-Norwalk MSA is excellent. Performance in the limited-scope AAs did not impact the investment test rating for the state.

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

Based on the significant volume of investments, performance in the Bridgeport AA is excellent. JPMCB funded 61 investments in the MSA totaling \$22.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on one prior period investment as of year-end 2010 was \$0.2 million. Additionally, approximately \$14.9 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development needs in the AA is good, with the majority of investments related to affordable housing. The MSA is considered a "high-cost" housing area.

The largest investment in the Bridgeport-Stamford-Norwalk MSA totaled \$7.9 million, which consisted of a direct investment in LIHTC to support the development of new affordable housing. Other investments consisted primarily of investments in affordable housing and revitalization and stabilization and contributions to community services. Additionally, the bank demonstrated leadership by working on the front end to structure several transactions as well as sitting on the boards of several community development organizations.

The bank also made investments and grants to organizations and funds throughout the state of Connecticut and in a broader regional area around Connecticut, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 13 investments for \$7.3 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 22 investments with remaining balances totaling \$3.0 million in the broader statewide area with the potential to benefit the bank's AAs. Additionally, approximately \$5.7 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 36 investments for \$39.7 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 80 investments with remaining balances totaling \$56.4 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state area.

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

Based on a limited-scope review, the bank's performance under the investment test in the New Haven-Milford MSA is excellent and not inconsistent with the overall excellent performance in Connecticut. Refer to the Table 14 in the state of Connecticut section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Connecticut is rated Low Satisfactory. A full-scope review of the Bridgeport-Stamford-Norwalk AA reflected an adequate level of service. Chase provided a relatively high level of community development services to the AA.

### **Retail Banking Services**

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

The distribution of bank branches in the Bridgeport-Stamford-Norwalk AA is poor as delivery systems are accessible to limited portions of the bank's AA. The percentage of branches in low- and moderate-income geographies of the Bridgeport AA is significantly below the population residing in the geographies. However, when giving consideration to branch

locations that are in close proximity to low- and moderate-income geographies, services are reasonably accessible to essentially all portions of the AA. The opening and closing of branches has generally not adversely affected accessibility of delivery systems, particularly in low- and moderate-income geographies. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. A good network of full-service ATMs improves delivery systems making them reasonably accessible to essentially all portions of the AA including low- and moderate-income geographies and individuals.

### **Community Development Services**

The bank provides a good level of community development services to the full-scope area. Working with community organizations, Chase employees supported affordable housing efforts, homebuyer support services and financial literacy through workshops and seminars in the low- and moderate-income community. A relatively high level of community development leadership occurred given the record of 23 board and committee memberships. This evaluation included services provided in the broader statewide region that had the potential to positively impact the AA. Chase provides electronic benefits transfers for public assistance payments to the state.

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

Based on a limited-scope review, the bank's performance under the service test in the New Haven-Milford AA is stronger than the bank's performance of Low Satisfactory in Connecticut. Performance in the limited-scope area did not materially impact the overall rating for the state of Connecticut. Refer to Table 15 in the state of Connecticut section of appendix D for the facts and data that support these conclusions.

## State of Florida

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors supporting the ratings include

- Excellent overall lending test performance is the result of significantly positive community development lending in the full-scope area. Strong performance in the limited-scope areas had a positive impact on the state rating, supporting the excellent performance in the full-scope Miami-Miami Beach-Kendall AA. Within the full-scope area, the distribution of loans within geographies of different income levels was good, the distribution of loans to borrowers of different income levels was adequate, and lending activity was excellent.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Service test performance reflects a good distribution of branches and ATMs, as well as good hours of service and a good record of community service.

### Description of Institution's Operations in the Rating Area

The bank has defined 14 AAs in Florida. The WaMu transaction significantly expanded the number of AAs within the state. The Miami-Miami Beach-Kendall MD was selected for a full-scope review given that it represents 33% of bank deposits in the state. The remaining AAs received a limited-scope review.

Chase is the 6th largest banking financial institution in the state of Florida operating over 250 branch offices and nearly 500 deposit taking ATMs. For this state rating area, 234 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. As of June 30, 2010, the bank held \$10.5 billion in deposits representing 2.6% of the market share for the entire state. There are over 300 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top three banks accounting for over 44% of the entire market share. The bank's primary competitors within the state include Bank of America, N.A., Wells Fargo Bank, N.A. and SunTrust Bank with deposit market shares of 18%, 16%, and 10%, respectively. The bank's deposits from the state represent 2% of the bank's total deposits. As a result, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Florida is rated Outstanding. Based on a full-scope review, the bank's performance in the Miami-Miami Beach-Kendall AA is excellent.

Excellent community development lending and lending activity support this conclusion. Performance in the limited-scope AAs had a positive impact on the lending test rating for the state. Three of the limited-scope AAs represented 52% of the bank's deposit base in the state.

## **Lending Activity**

Lending activity in the Miami-Miami Beach-Kendall AA is excellent. The bank has a 4.3% deposit market share and is ranked sixth among the banks located in the AA. Chase is ranked seventh, eighth, and fourth among deposit taking financial institutions in the AA in its home purchase, home improvement, and home refinance lending market share, respectively. The bank is one of the leading banks in the market in refinance originations. A large number of credit card banks dominate the small business loan market. Nine of the top twenty small business lenders, including the bank's affiliate, are credit card banks. Chase ranks twenty-second for small business loans among banks in the AA.

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

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

The distribution of loans within geographies of different income levels is good. For all mortgage loan products, we considered the limited volume of owner-occupied housing units in the low-income census tracts and placed more weight on performance in the moderate-income tracts. Home purchase lending was excellent, and home improvement and refinance lending were good. Small business lending is also good. Despite very limited opportunities in low-income tracts, the bank demonstrated good performance there. This was enhanced by excellent performance in moderate-income census tracts where there are significantly more opportunities from a greater volume of small businesses located there. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels is adequate. The distribution of home mortgage loans is adequate, even after considering the severe impact that the economic downturn had on housing and the high foreclosure rate, the volatility in the cost of housing, and high household poverty level (18%) in the AA. Recent data from the National Association of Realtors shows that the median sales price of an existing single family home in the AA is \$201 thousand. The updated median family income for the AA indicates that a low-income individual earns less than \$25 thousand a year and a moderate-income person earns less than \$41 thousand a year. While median sales prices have declined due to the housing crisis, high property taxes and insurance add another layer of difficulty for low-income borrowers. Home purchases are challenging for low-income borrowers unless they have access to subsidies, which are scarce. Homeownership is very difficult for most low- and moderate-income borrowers. After considering these factors, home purchase, home



improvement, and home refinance lending is adequate. The distribution of loans to businesses of different revenue sizes is adequate as well.

## **Community Development Lending**

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

Community development in the Miami AA had a significant, positive impact on lending performance. The bank originated 54 loans totaling over \$71 million. All of the loans targeted affordable housing, an identified need of the community. The volume of loans represents 18.1% of Tier 1 Capital allocated to the AA. Chase provided \$8.5 million in construction and construction to permanent loan financing for the development of 204-units of affordable rental housing targeted towards households earning 60% or less of the area median income.

## **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Miami-Miami Beach-Kendall AA, the bank made nearly 5,000 mortgage loans under various flexible mortgage programs.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Orlando, and Tampa-St. Petersburg-Clearwater AAs is not inconsistent with the bank's overall excellent performance under the lending test in the state of Florida. The bank's performance in the Deltona-Daytona-Ormond Beach, Jacksonville, North Port-Bradenton-Sarasota, Palm Bay, and West Palm Beach-Boca Raton-Boynton Beach AAs is weaker than overall performance in the state; however, is considered good. In all these AAs with the exception of West Palm Beach, significantly positive community development lending elevated adequate lending performance. The West Palm Beach lending performance was good with no benefit from community development lending. The bank's performance in the Cape Coral-Fort Myers, Lakeland-Winter Haven, Naples-Marco Island, Port St. Lucie, and Sebastian-Vero Beach AAs is weaker than the overall performance in the state; however, is considered adequate. These AAs did not benefit from community development lending. Refer to the Tables 1 through 12 in the state of Florida section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Florida is rated Outstanding. Based on a full-scope review, performance is excellent in the Miami-Miami Beach-Kendall AA. Performance in the limited-scope AAs did not materially impact the investment test rating for the state.

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

Based on the significant volume of investments, performance in the Miami AA is excellent. JPMCB funded 84 investments in the MSA totaling \$91.8 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 30 prior period investments as of year-end 2010 was \$23.0 million. Additionally, approximately \$14.7 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Miami-Miami Beach-Kendall MSA totaled \$22.8 million, which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Florida and in a broader regional area around Florida, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 22 investments for \$67.4 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 13 investments with remaining balances totaling \$13.0 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 14 investments for \$31.4 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Deltona-Daytona-Ormond Beach, Jacksonville, Lakeland-Winter Haven, Naples-Marco Island, North Port-Brandenton-Sarasota, Orlando, Palm Bay, Sebastian-Vero Beach, Tampa-St. Petersburg-Clearwater and West Palm Beach-Boca Raton-Boynton Beach MSAs is excellent and not inconsistent with the overall Outstanding performance in Florida. Performance in the Fort Lauderdale-Pompano Beach-Deerfield MSA is good and weaker than the overall performance in Florida. Performance in the Cape Coral-Fort Myers and Port St. Lucie MSAs is very poor and significantly weaker than the overall performance in Florida. Weaker performance is based on a lower or no amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively impact the investment test rating for Florida. Refer to the Table 14 in the state of Florida section of appendix D for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Florida is rated High Satisfactory. A full-scope review of the Miami-Miami Beach-Kendall AA determined the bank provides a good level of retail services and a good level of community development services.

#### Retail Banking Services

Branch distribution is good; bank services are accessible to all portions of the Miami-Miami Beach-Kendall AA. The bank opened three branches in the area, including one branch in a moderate-income area, which improved accessibility. No branches were closed during the evaluation period in the full-scope area. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network offers good access in low- and moderate-income areas.

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

#### Community Development Services

The bank provided a good level of responsiveness to community development service needs in the Miami-Miami Beach-Kendall AA. Evaluation of this AA also included CD services in the broader statewide areas such as EBT debit card services with potential to benefit the AA. The bank's participation in community development services included providing technical assistance through participation on loan committees, homebuyer seminars and financial literacy workshops, and board memberships. The state is one of the top ten foreclosure states with continued foreclosure prevention assistance needs.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, service test performance in the Naples-Marco Island and Tampa-St Petersburg-Clearwater AAs was excellent and stronger than the good performance in the state overall, primarily due to excellent branch distribution. Performance in the Jacksonville, Lakeland-Winter Haven, Orlando-Kissimmee-Sanford, Port St. Lucie, and the West Palm Beach-Boca Raton-Boynton Beach AAs is not inconsistent with the good performance in the state overall. The bank's performance in the Cape Coral-Fort Myers, Deltona-Daytona Beach-Ormond Beach, Fort Lauderdale-Pompano Beach-Deerfield Beach, North Port-Bradenton-Sarasota, Palm Bay-Melbourne-Titusville, and Sebastian-Vero Beach AAs is weaker than the overall good performance in the state, due to less accessible branch distribution. Performance in the limited-scope areas did not significantly impact the overall rating for the state. Refer to Table 15 the state of Florida section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## State of Georgia

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors supporting the ratings include

- Excellent volume of community development lending was the primary reason for elevating otherwise good lending test performance to the excellent level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- After considering the additional benefit from branches located near low- and moderate-income geographies, but located in other tracts, service test performance reflects an excellent distribution of branches, good service hours, and a good record of community service.

## Description of Institution's Operations in the Rating Area

There is one AA within the state – the Atlanta-Sandy Springs-Marietta MSA. The state is a new rating area for the bank as a result of its purchase from the FDIC of certain assets of WaMu, which failed in 2008.

Chase operates 62 branches and over 100 deposit taking ATMs in Georgia. For this state rating area, 55 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. The bank is the twenty-seventh largest bank in the state with a 0.4% market share overall. There are over 300 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top three banks accounting for 43% of the entire market share. Within the MSA, the bank holds \$600 million of deposits which represents 0.1% of the bank's total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Georgia is rated Outstanding. Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs-Marietta MSA is excellent. Excellent community development lending and lending activity support this conclusion.

#### Lending Activity

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

Lending activity is excellent. The bank has a minimal deposit presence in the MSA, ranked sixteenth with a deposit market share of 0.6%. Lending ranks are higher and lending market shares for all products exceeds the bank's deposit market share. The bank made an excellent volume of loans, especially considering the small deposit presence in the MSA.

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

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

The distribution of loans within geographies of different income levels was adequate. Home purchase lending was excellent overall, due to excellent lending in both low- and moderate-income geographies. For the home improvement loan product, performance was poor overall, with poor performance in low-income areas and adequate performance in moderate-income geographies, respectively. Refinance lending was poor overall in both low- and moderate-income tracts, but rose to adequate performance by a good market share performance. Small business performance was good overall with excellent performance in the low-income tracts and adequate performance in the moderate-income census tracts further supported by good market share performance. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different income levels is good. Home purchase lending to borrowers of different income levels is excellent in both the low- and moderate-income tracts. Home improvement lending performance is adequate and home refinance lending is good. Small business lending is good, as well.

### **Community Development Lending**

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

Community development in the Atlanta AA had a significant, positive impact on lending performance. The bank originated 14 loans totaling over \$86 million. All of the loans targeted affordable housing. The volume of loans represents 116% of Tier 1 Capital allocated to the AA.

### **Other Loan Data**

Chase provided for consideration two standby letters of credit totaling \$27.8 million that facilitated the creation of affordable housing. Refer to Table 1 Other in the state of Georgia section of appendix D for facts and data on these letters of credit.

## Product Innovation and Flexibility

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Atlanta-Sandy Springs-Marietta AA, the bank made nearly 10,000 mortgage loans under various flexible mortgage programs.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Georgia is rated Outstanding. Based on a full-scope review, performance is excellent in the Atlanta-Sandy Springs-Marietta MSA.

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

Performance is excellent in the Atlanta-Sandy Springs-Marietta MSA. Based on the significant volume of investments, performance in the Atlanta AA is excellent. JPMCB funded 99 investments in the MSA totaling \$25.2 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 34 prior period investments as of year-end 2010 was \$51.2 million. Additionally, approximately \$5.4 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Atlanta-Sandy Springs-Marietta MSA totaled \$6.0 million which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Georgia and in a broader regional area around Georgia, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made six investments for \$3.9 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 22 investments with remaining balances totaling \$11.5 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 37 investments for \$14.7 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 29 investments with remaining balances totaling \$14.7 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

## **SERVICE TEST**

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

The bank's performance under the service test in Georgia is rated outstanding. A full-scope review of the Atlanta-Sandy Springs-Marietta AA revealed the bank provides an excellent level of retail services and a good level of community development services.

#### **Retail Banking Services**

The distribution of bank branches is excellent, as services are readily accessible to all portions of the Atlanta-Sandy Springs-Marietta AA. The majority of the branches were acquired from the FDIC as part of the WaMu transaction. The percentage of the bank's branches located in low- and moderate-income geographies is slightly below the percentage of the AA's population residing in both geographies. However, when consideration is given to branch locations that are near to low- and moderate-income geographies, accessibility is improved in both geographies. The bank opened eight branches and closed one during the evaluation period. The branch openings were in middle- or upper-income tracts, while the branch closing was in a low-income tract. Considering the close proximity of branches which are near to low- and moderate-income tracts, this activity has generally not adversely affected the accessibility of its delivery systems. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network provides good access to banking service accessibility to low- and moderate-income geographies and individuals. Refer to Table 15 in the state of Georgia section of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

#### **Community Development Services**

Responsiveness to the community development service needs in the Atlanta-Sandy Springs-Marietta AA is good. Evaluation of this AA included services provided in broader statewide areas such as EBT with potential to benefit this AA. The Atlanta metropolitan area continues to be impacted by the financial crisis as demonstrated in the continued declining housing market and depressed commercial development. The area is a HUD renewal community. CD services for the low- to moderate-income included: foreclosure prevention training, financial literacy seminars, and delivery of financial education curriculum for elementary and middle schools. Bank employees demonstrated leadership with board memberships. Refer to Table 15, the state of Georgia section, of appendix D for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

## State of Idaho

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors supporting the ratings include:

- Good distributions of loans to borrowers of different income levels and adequate distribution to geographies of different income elevated by excellent lending activity resulted in the lending test rating of High Satisfactory.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Good service test performance was evidenced in good branch distribution and business hours, adequate ATM distribution, and an adequate record of community services.

## Description of Institution's Operations in the Rating Area

The bank has seven defined AAs in Idaho, four of which are MSAs. For purposes of this review, three AAs that are not MSAs have been combined under the Idaho Non-MSA AA. Given that the Boise City-Nampa MSA comprises 61% of bank deposits in the state, this MSA was selected for a full-scope review. The remaining AAs received limited-scope reviews.

The state is a new rating area for the bank as a result of its purchase from the FDIC of certain assets of WaMu, which failed in 2008.

Chase is the 15th largest banking financial institution in the state of Idaho operating over 20 branch offices and nearly 30 deposit taking ATMs within the state. For this state rating area, 22 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. As of June 30, 2010, the bank held \$395 million in deposits representing 2% of the market share in the state. There are over 30 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top three banks accounting for 44% of the entire market share. Primary competitors within the state include Wells Fargo Bank, N.A. and U.S. Bank, N.A. with deposit market shares of 24% and 15%, respectively. Idaho accounts for less than 1% of the bank's total deposits. As a result, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Idaho is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Boise City-Nampa AA is good. Performance in the limited-scope AAs did not impact the lending test rating for the state of Idaho.



## **Lending Activity**

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

Lending activity is excellent. The bank has a three percent deposit market share and is ranked twenty-second among the banks located in the Boise City AAAA. HMDA lending ranks are higher and HMDA lending market shares exceeds the bank's deposit market share. The bank made an excellent volume of loans, especially considering the small deposit presence in the MSA. Chase ranks twenty-fifth for small business loans among banks in the AA. National credit card lenders have 66% of the market share in the AA.

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

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

The distribution of loans within geographies of different income levels is adequate. Excellent penetration into low- and moderate-income geographies for small business lending was offset by poor performance for the HMDA-related products. For HMDA products, the poor level of performance is the result of adequate performance for home purchase and poor performance for both home improvement and refinance lending. We did not identify any conspicuous or unexplained gaps in lending patterns in the Boise AA.

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

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

The distribution of loans to borrowers with different income levels is good. Excellent performance for home purchase lending, adequate performance for home improvement lending, and good performance for home refinance lending was offset by adequate performance for loans to businesses with revenue of different sizes.

## **Community Development Lending**

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

Community development lending had a neutral impact on lending test performance in the full-scope area. No loans were originated.

## **Product Innovation and Flexibility**

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

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

Based on limited-scope reviews, the bank's performance under the lending test in the Pocatello and non-metropolitan AAs is not inconsistent with the bank's overall High Satisfactory performance under the lending test in the state of Idaho. The bank's performance in the Coeur d'Alene and Idaho Falls AAs is weaker than the overall performance in the state; however, it is considered adequate. These areas had poor performance in the geographic distribution of HMDA loans, which decreased the overall rating. Performance in these AAs did not have an impact on the overall rating for the state of Idaho. Refer to the Tables 1 through 12 in the state of Idaho section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Idaho is rated Outstanding. Based on a full-scope review, performance in the Boise City-Nampa MSA is excellent. Performance in the limited-scope AAs did not materially impact the investment test rating for the state.

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

Based on the significant volume of investments, performance in the Boise City AA is excellent. JPMCB funded 14 investments in the MSA totaling \$1.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on five prior period investments as of year-end 2010 was \$0.3 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Boise City-Nampa MSA totaled \$0.6 million which consisted of an investment in a community based non-profit that provides affordable housing. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Idaho and in a broader regional area around Idaho, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made eight investments for \$1.6 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made five investments for \$0.6 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 19 investments with remaining balances totaling \$1.0 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Coeur d'Alene and Idaho Falls MSAs is excellent and not inconsistent with the overall excellent performance in Idaho. Performance in the Idaho Non-MSA is adequate and weaker than the overall performance in Idaho. Performance in the Pocatello MSA is very poor and significantly weaker than the overall performance in Idaho. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not negatively impact the investment test rating for Idaho. Refer to the Table 14 in the state of Idaho section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Idaho is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Boise City-Nampa AA is good. The review of this AA determined that the bank provides a good level of retail services and an adequate level of community development services. Performance in most of the limited-scope AAs supported the overall state rating.

### **Retail Banking Services**

The distribution of bank branches is good and services are accessible to all portions of the full-scope area. All of the bank's branches were acquired from the FDIC as part of the WaMu transaction. Branch hours are good and do not vary in a way that inconveniences any portion of the AA.

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

### **Community Development Services**

The bank's responsiveness to community development service needs in the Boise City-Nampa AA is adequate. This evaluation included the broader statewide areas with potential to benefit the service area. The state of Idaho is one of the top ten foreclosure states with a continued need for foreclosure prevention assistance. Employee participation in CD services included technical assistance to a non-profit organization, financial education on the mortgage process and home-buying, and EBT debit card government program for qualified low- to moderate-income individuals and families.

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

Performance in most of the limited-scope AAs supported the overall state rating. Based on limited-scope reviews, service test performance in the Coeur d'Alene, Idaho Falls, and Pocatello AAs is excellent and stronger than the performance in the state overall.

Performance in the combined non-MSA AA is weaker than the performance in the state, due to the lack of any branches in low- and moderate-income geographies.

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

## State of Illinois

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors supporting the ratings include:

- Good overall lending test performance is the result of the bank's performance in the limited-scope AAs and significantly positive community development lending in several of the limited-scope AAs. Good performance in these areas had a positive impact on the state rating, elevating the adequate performance in the full-scope Rockford AA. Within the full-scope area, the distribution of loans within geographies of different income levels was adequate, the distribution of loans to borrowers of different income levels was good, and lending activity was good.
- Excellent investment test performance is based on a good volume of qualified investments in the full-scope area and a significant volume of broader statewide and regional area investments with the potential to benefit the state, which elevated the rating for the state.
- Excellent service test performance was evidenced primarily through excellent branch and ATM distribution, good business hours, and an adequate record of community services.

## Description of Institution's Operations in the Rating Area

Chase has delineated eight AAs within the state, all of which are within MSAs. Two of these areas are within the Chicago-Joliet-Naperville MMSA, which is a separate rating area from the state (Please see the Chicago-Joliet -Naperville MMSA rating area for a description of the bank's operations in that area.) Of the deposits in the state (excluding the multistate area), 35% are concentrated in the Rockford AA; therefore, it was selected for a full-scope review. The remaining AAs were analyzed using limited-scope procedures.

Excluding the multistate area, the bank operates 24 branches and 41 deposit taking ATMs in the state and ranking sixth with over 2% of the deposit market share. There are over 450 FDIC-insured depository institutions in the state overall, with the top competitor holding over 11% of deposits. The bank holds \$1.8 billion of deposits in this portion of Illinois, which represents 0.4% of the bank's total deposits. As such, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Illinois is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Rockford AA is adequate. Performance in the limited-scope AAs had a positive impact the lending test rating for the state of Illinois. The Rockford AA represents only 35% of the deposits for Illinois. The five limited-scope AAs demonstrated stronger performance than in the Rockford AA.

### Lending Activity

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

Lending activity is good. The bank has a 12% deposit market share and is ranked third among the banks located in the Rockford AA. Its lending market shares are much lower but ranks are favorable, especially in light of competition. Chase is ranked sixth among deposit taking financial institutions in the AA in its home purchase and fifteenth for home refinance lending market share. The bank has no market share for home improvement lending for 2009. A large number of credit card banks dominate the small business loan market. Seven of the top ten small business lenders, including the bank's affiliate, are credit card banks. Chase ranks sixth for small business loans, among banks with deposit market share in the AA.

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

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

The distribution of loans within geographies of different income levels is adequate. Excellent penetration into low- and moderate-income geographies for small business lending was offset by poor performance for the HMDA-related products. Performance for home purchase lending was adequate and performance for both home improvement and refinance lending was poor. We did not identify any conspicuous or unexplained gaps in lending patterns in the Rockford AA.

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

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

The distribution of loans to borrowers with different income levels is good. Performance for the HMDA related products was good. Borrower distribution for home purchase loans was excellent, distribution for home improvement loans was adequate and distribution for home refinance loans was good. Performance for loans to businesses with revenue of different sizes was poor.

## **Community Development Lending**

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

Community development lending had a neutral impact on lending in the Rockford AA. The bank originated five community development loans totaling \$3.8 million. Most of the loans addressed affordable housing needs and helped to provide community services to low- and moderate-income people.

## **Product Innovation and Flexibility**

Product innovation and flexibility had a neutral impact on performance in the full-scope area. The bank provided information on flexible loan programs in the full-scope AA, which indicated a limited volume of loan originations with flexible features.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Bloomington-Normal, Davenport-Moline-Rock Island, and Springfield AAs is not inconsistent with the bank's overall High Satisfactory performance under the lending test in the state of Illinois. In the Champaign-Urbana and Peoria AAs, the bank's performance is stronger than the bank's overall performance in the state and is considered excellent. Adequate performance in geographic distribution of loans and good performance in borrower distribution along with the significant positive impact of community development lending elevated the lending rating to excellent. Performance in these AAs did have an impact on the overall rating for the state of Illinois. Refer to the Tables 1 through 12 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Illinois is rated Outstanding. Based on a full-scope review, performance in the Rockford AA is good. The significant volume of broader statewide and regional area investments with the potential to benefit the state helped to elevate the investment test rating for the state. Performance in the limited-scope AAs generally supported the bank's rating for the state.

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

Investment test performance in the Rockford AA is good. JPMCB funded 33 investments in the MSA totaling \$2.6 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on four prior period investments as of year-end 2010 was \$0.5 million. The bank's responsiveness to the community development needs in the AA is adequate, with the majority of investments related to affordable housing. The largest

investment in the Rockford MSA totaled \$0.7 million which consisted of an investment in a project designed to provide affordable rental housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing community services.

Investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and helped to elevate the overall state rating. These investments and grants were made to organizations and funds throughout the state of Illinois and in a broader regional area around Illinois, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 19 investments for \$6.7 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 37 investments with remaining balances totaling \$21.8 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 20 investments for \$11.2 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 65 investments with remaining balances totaling \$18.0 million in the broader regional area with the potential to benefit the bank's AAs. The combined amounts invested in broader statewide and regional areas with the potential to benefit the state's AAs exceeded the amounts invested directly in the AAs.

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

Based on limited-scope reviews, the bank's performance under the investment test in the Bloomington-Normal, Champaign-Urbana, Davenport-Moline-Rock Island, and Peoria AAs is excellent and not inconsistent with the overall excellent performance in Illinois. Performance in the Springfield MSA is poor and significantly weaker than the overall performance in Illinois. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in limited-scope AAs did not significantly impact the investment test rating for Illinois. Refer to the Table 14 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Illinois is rated Outstanding. Based on a full-scope review of the Rockford AA, the bank's performance is excellent based on an excellent level of retail services and an adequate level of community development services. Performance in the limited-scope AAs supported the Outstanding service test rating for the state of Illinois.

### **Retail Banking Services**

Branch distribution is excellent and provides readily accessible services to all portions of the full-scope area. By percentage, the number of branches located in low- and moderate-income census tracts significantly exceeds the population percentages in these geographies. Branch



hours are good and do not vary in a way that inconveniences any portion of the AA. No branches were opened or closed during this evaluation period in either the full-scope or limited-scope AAs in the state. Access to banking services is further augmented by excellent access to deposit taking ATMs.

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

### **Community Development Services**

Responsiveness to the community development service needs in the Rockford AA is adequate. The bank supports various CD organizations offering assistance with job training, financial education, and foreclosure prevention who work in the low- or moderate-income areas. Employees provide leadership on the boards of various non-profit organizations focused on economic development, housing, job training, and education initiatives.

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

Based on limited-scope reviews, service test performance in most AAs was not inconsistent with the excellent performance in the state of Illinois. The bank's performance in the Champaign-Urbana AA was weaker than the bank's overall performance in the state due to an adequate branch distribution. Performance in the limited-scope AAs supported the overall rating for the state of Illinois. Refer to Table 15 in the state of Illinois section of appendix D for the facts and data that support these conclusions.

## State of Indiana

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors supporting the ratings include:

- The excellent volume of community development lending was the primary reason for elevating otherwise good lending test performance to the excellent level.
- The combined volume of prior and current period qualified investments as well as unfunded commitments to invest demonstrates excellent responsiveness to the investment needs of the full-scope AA. A significant volume of investments in the broader statewide and regional area elevated the rating for the state.
- Excellent service test performance was driven by excellent branch and ATM distribution, good business hours, and an adequate record of community services.

## Description of Institution's Operations in the Rating Area

Chase has delineated 16 AAs within the state. One of these areas is within the Chicago-Joliet-Naperville, IL-IN-WI MMSA, one is in the Cincinnati-Middletown, OH-KY-IN MMSA, and one is in the Louisville/Jefferson County, KY-IN MMSA. These MMSAs are separate rating areas from the state. (Please see these separate rating areas for a description of the bank's operations in those areas.) Of the remaining AAs, eight are in MSAs and five are in non-metropolitan areas. A majority of the bank's deposits in the state are concentrated in the Indianapolis AA. As such, this area was selected for a full-scope review. The remaining AAs, including the combined non-metropolitan AAs, were analyzed using limited-scope procedures.

Excluding the multistate areas, the bank operates over 140 branches and 200 deposit taking ATMs in the state. The bank holds \$10.4 billion of deposits in this portion of Indiana, which represents 2.0% of the bank's total deposits.

There are over 160 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top four banks accounting for 35% of the entire market share. The bank is ranked first in the rating area with a 12.2% deposit market share. The bank's deposits in this portion of the state represent 2% of the bank's total deposits. As such, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

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

community development lending and lending activity support this conclusion. Performance in the limited-scope areas did not impact the lending test rating in the state.

## **Lending Activity**

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

Lending activity is excellent. The bank has the largest deposit market share in the AA with 25% of all deposits. Lending market shares are well below that level, but are reflective of the competition in the area. The bank originated a significant volume of home purchase and home refinance loans giving it a third and fourth place ranking, respectively, in marketplace. Home improvement lending was ranked ninth. For small business lending, the bank ranks eighteenth. If financial institutions without a deposit presence in the AA are removed from consideration, Chase is a leader in loan production.

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

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

The distribution of loans within geographies of different income levels is poor. Excellent performance for small business lending and good performance for home improvement lending is offset by poor performance for home purchase and home refinance lending. We did not detect any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was good. Both home purchase and home improvement lending had excellent performance in both low- and moderate-income geographies. Home refinance lending had excellent performance in the moderate-income geographies and adequate performance in the low-income geographies. Loans to businesses with revenues of different sizes were adequate.

## **Community Development Lending**

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

The bank generated an excellent volume of community development loans in the Indianapolis AA, which had a significant positive impact on lending performance. The bank originated 30 community development loans totaling \$120.1 million. The dollar volume represents 13.9% of the Tier 1 Capital allocated to the AA. Most of the loans addressed affordable housing needs and helped to provide community development services to low- and moderate-income residents.

The bank originated five community development loans in the broader statewide area that includes the Indiana AAs. These loans totaled \$607 million and were in areas with the potential to benefit the Indiana AAs. All of the loans targeted affordable housing. The dollar volume demonstrates the bank's willingness to address community development needs throughout the state and was given positive consideration in arriving at our conclusion.

### **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Indianapolis AA, the bank made nearly 8,000 mortgage loans under various flexible mortgage programs.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Bloomington AA is not inconsistent with the bank's overall excellent performance under the lending test in the state of Indiana. In the Elkhart-Goshen, Lafayette, Michigan City-La Porte, Muncie, South Bend-Mishawaka and non-metropolitan AAs, the bank's performance is weaker than the bank's overall performance in the state, but is still considered good. In the Elkhart, Lafayette, and Muncie AAs, the bank's geographic distribution performance was weaker than the bank's performance in these criteria, but these areas had excellent community development lending performance to elevate the rating. In the Michigan City, South Bend and non-metropolitan AAs, the geographic and borrower distribution performance was not inconsistent with the state's performance, but these areas had no community development lending to elevate the rating. The bank's performance in the Fort Wayne MSA was weaker than the bank's overall performance in the state and considered adequate. Geographic distribution performance was weaker than the state and this AA did not have enough community development lending to enhance the rating. Performance in these AAs did not have an impact on the overall rating for the state of Indiana. Refer to the Tables 1 through 12 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Indiana is rated Outstanding. Based on a full-scope review, performance in the Indianapolis MSA is excellent. This conclusion is based on the volume of prior and current period investments as well as the volume of unfunded commitments to invest. Performance in some of the limited-scope AAs negatively impacted the investment test rating for the state. However, a significant volume of investments in broader statewide and regional area organizations with the potential to benefit the state positively impacted the bank's performance and elevated the bank's investment test rating for the state.

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

The excellent performance in the Indianapolis AA is based on the combined volume of the prior period, current period, and as-yet unfunded investments. JPMCB funded 112 investments in the MSA totaling \$23.6 million in the current period. Additionally, approximately \$17.4 million in legally-binding, unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. We also considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 21 prior period investments as of year-end 2010 was \$19.1 million. The bank's responsiveness to the community development needs in the AA is good, with the majority of investments related to affordable housing. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The largest investment in the Indianapolis MSA totaled \$5.0 million which consisted of an investment in a project designed to provide affordable rental housing for seniors through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing, community services and activities that revitalize or stabilize LMI geographies.

A significant volume of investments in the broader statewide and regional areas helped to elevate the overall investment test rating for the state. The bank made investments and grants to organizations and funds throughout the state of Indiana and in a broader regional area around Indiana, but not located within the bank's AAs in the state. These investments and grants have the potential to benefit the AAs in the state. In the current evaluation period, the bank made 22 investments for \$7.8 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 28 investments with remaining balances totaling \$9.2 million in the broader statewide area with the potential to benefit the bank's AAs. In the current evaluation period, the bank also made one investment for \$0.4 million in the broader regional area with the potential to benefit the bank's AAs.

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

Performance in some of the limited-scope AAs negatively impacted the investment test rating for Indiana. The weaker performance in these limited-scope areas was offset by broader statewide and regional area investments with the potential to benefit the state. Based on limited-scope reviews, the bank's performance under the investment test in the Fort Wayne, Muncie, and South Bend-Mishawaka AAs is excellent and not inconsistent with the overall excellent performance in Indiana. Performance in the Lafayette MSA is adequate and weaker than the overall performance in Indiana. Performance in the Bloomington MSA is poor and significantly weaker than the overall performance in Indiana. Performance in the Elkhart-Goshen and Michigan City-La Porte MSAs and the Indiana Non-MSA is very poor and significantly weaker than the overall performance in Indiana. Weaker performance is demonstrated by the lower volume of qualified investments relative to the bank's operations in the AA.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the service test in Indiana is rated Outstanding. A full-scope review of the Indianapolis AA reflects excellent distribution of branches and ATMs. Performance in the limited-scope AAs did not impact the service test rating for Indiana.

#### Retail Banking Services

The distribution of bank branches within the full-scope area is excellent as their services are readily accessible to all portions of the AA. The record of opening and closing branch offices has not adversely affected the accessibility of delivery systems. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. All branches offer extended hours during the week and have Saturday hours, including branches in low- and moderate-income geographies. Full-service ATM locations provide an alternative delivery service to low- and moderate-income geographies and individuals. Traditional banking services are augmented by the bank's Rapid Cash Program. Sixty-five percent of the Rapid Cash transactions that originated in the full-scope area were made from low- and moderate- income geographies.

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

#### Community Development Services

The bank provided an adequate level of community development services to the Indianapolis AA. Employees provided community development services and assistance to 12 organizations in the full-scope area. This included membership on Boards of Directors and on committees of various community development organizations that focus on a variety of needs within the community, including affordable housing initiatives. Personnel also assisted with the Volunteer Income Tax Assistance (VITA) program and "Mortgage Day" at various bank branches. The bank also provides electronic benefits transfers for public assistance payments. Area needs include affordable housing, basic banking, and financial literacy.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Elkhart-Goshen and Lafayette AAs is not inconsistent with the bank's overall excellent performance under the service test in the state of Indiana. Performance in these areas further supported the excellent performance in the state. In the Bloomington, Fort-Wayne, Michigan City-La Porte, Muncie, South Bend-Mishawaka, and the non-metropolitan AAs, performance is adequate and weaker primarily due to branch distribution. Performance in the lower-rated limited-scope areas did not significantly impact the overall rating for the state of Indiana. Refer to Table 15 in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## State of Kentucky

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors supporting the ratings include:

- Excellent distribution of loans to borrowers of different income levels offset by adequate distribution of loans within geographies of different income levels were the primary reasons behind the lending test rating.
- An excellent volume of broader statewide and regional area investments elevated an adequate level of performance demonstrated in the full-scope area to an overall good level for the state.
- Excellent service test performance was evidenced primarily through excellent branch and ATM distribution, good business hours, and a good record of community services.

## Description of Institution's Operations in the Rating Area

Chase has delineated eight AAs within the state. One of these areas is within the Cincinnati-Middletown, OH-KY MMSA and one is in the Louisville/Jefferson County, KY-IN MMSA. These MMSAs are separate rating areas and were not factored in to the evaluation of the performance in Kentucky. (Please see these separate rating areas for a description of the bank's operations in the areas.) Of the remaining AAs in the state, four are in MSAs and two are in non-metropolitan areas. Within Kentucky, 70.9% of deposits are concentrated in the Lexington-Fayette AA. Therefore, this AA was selected for a full-scope review. The remaining AAs, including the combined non-metropolitan AAs, were analyzed using limited-scope procedures.

Excluding the multistate areas, the bank operates 31 branches and 34 deposit taking ATMs in the state. There are over 200 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top six banks accounting for nearly 27% of the entire market share. The bank is ranked sixth in the rating area with a 3.3% deposit market share. The bank holds \$1.5 billion of deposits in this portion of Kentucky, which represents 0.3% of the bank's total deposits. As a result, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Kentucky is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Lexington-Fayette AA is good. Performance in the limited-scope AAs did not impact the lending test rating in the state.

## **Lending Activity**

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

Lending activity is excellent, especially in light of competition. The bank has the second largest share of deposits in the AA. While lending market shares are not as high, the bank ranks third for home purchase loans, fifth for refinance loans, and eighteenth for small business lending. The bank has no market share for home improvement lending for 2009. Market shares and ranks are excellent if we consider only those financial institutions located in the AA. There are many mortgage lenders and small business credit card banks offering loans in the AA that do not maintain a deposit taking facility in the area.

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

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

The distribution of loans within geographies of different income levels is adequate. The performance for HMDA products is generally adequate, based on adequate home refinance lending and good distributions for home improvement and home purchase lending. Small business lending is good. The bank had good penetration into low-income census tracts for small business loans and excellent performance in the moderate-income tracts. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was excellent. Excellent performance for all HMDA related products was offset only by adequate performance for lending to businesses with different revenues. The Lexington-Fayette AA has a poverty level over 17%. We considered the impact that this high poverty level has in the ability of the bank to reach borrowers for mortgage loans.

## **Community Development Lending**

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

Community development lending had a neutral impact on lending performance in the Lexington-Fayette AA. The bank made one community development loan totaling \$3.8 million during the evaluation period in the full-scope area.

The bank originated four community development loans in the broader statewide area that includes the Kentucky AAs. These loans totaled \$17 million and were in areas with the



potential to benefit the Kentucky AAs. Most of the loans provided much needed help in financing affordable housing projects. The loans demonstrated the bank's willingness to address community development needs throughout the state and were given positive consideration in arriving at our conclusion.

### **Other Loan Data**

Chase provided for consideration four standby letters of credit totaling \$14 million that have a qualified community development purpose. The bulk of the dollars facilitated the creation of affordable housing. Refer to Table 1 Other in the state of Kentucky section of appendix D for facts and data on these letters of credit.

### **Product Innovation and Flexibility**

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

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

Based on limited-scope reviews, the bank's performance under the lending test in the Elizabethtown and Owensboro AAs is not inconsistent with the bank's overall High Satisfactory performance under the lending test in Kentucky. In the Bowling Green and non-metropolitan AAs, the bank's performance is weaker than the bank's overall performance in the state. Performance in the Bowling Green AA was diminished primarily because of poor performance in low- and moderate-income geographies. Performance in the non-metropolitan AAs was adequate for both borrower and geographic distribution. Performance in these AAs was not significant enough to affect the overall rating for the state of Kentucky. Refer to the Tables 1 through 12 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Kentucky is rated High Satisfactory. Based on a full-scope review, performance in the Lexington-Fayette MSA is adequate. Performance in the limited-scope AAs did not significantly impact the investment test rating for the state. The significant volume of investments in broader statewide and regional area organizations with the potential to benefit the state elevated the bank's investment test performance for the state to a good level.

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

The bank's investment test performance in the Lexington-Fayette MSA is adequate. JPMCB funded 25 investments in the Lexington-Fayette MSA totaling \$2.9 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on four prior

period investments as of year-end 2010 was \$0.7 million. The bank's responsiveness to the community development needs in the AA is adequate, with the majority of investments related to affordable housing. The largest investment in the Lexington-Fayette MSA totaled \$2.4 million which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and elevated the overall state performance to a good level. The bank invested a significant volume in organizations and funds throughout the state of Kentucky and in a broader regional area around Kentucky, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made six investments for \$2.2 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 19 investments with remaining balances totaling \$5.3 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 16 investments for \$13.2 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 42 investments with remaining balances totaling \$14.4 million in the broader regional area with the potential to benefit the bank's AAs. The volume of these investments in the broader statewide and regional area was considerably higher than the volume invested directly in the state's AAs.

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

Performance in limited-scope AAs did not significantly impact the investment test rating for Kentucky. Based on limited-scope reviews, the bank's performance under the investment test in the Bowling Green, Elizabethtown and Owensboro MSAs is excellent and stronger than the overall High Satisfactory performance in Kentucky. The bank demonstrated stronger performance by a higher amount of qualified investments relative to the bank's operations in the AA. Performance in the Kentucky Non-MSA is very poor and significantly weaker than the overall performance in Kentucky. Weaker performance is due to a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Kentucky is rated Outstanding. Based on a full-scope review, the bank's performance in the Lexington-Fayette AA demonstrates an excellent level of retail services and a good level of community development services.

## **Retail Banking Services**

The bank's performance under the service test in Kentucky is rated outstanding. A full-scope review of the bank's performance in the Lexington-Fayette MSA revealed an excellent level of service. The percentage of bank branches located in moderate-income geographies exceeds the percentage of the population residing in those geographies and is excellent. Branches located in the low-income geographies provide a good level of service. When giving consideration to middle- and upper-income branch locations (8) that are near to both the low- and moderate-income geographies, accessibility improves to excellent overall. No branch offices were opened or closed during this evaluation period. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. Most branches offer extended hours during the week and have Saturday hours. The branch located in a low-income geography does not offer weekend hours as it is located in the downtown area serving mostly employees in a government building and other business that are not open on the weekend. Four other branches within two miles of this branch offer Saturday hours. The ATM network offers an excellent alternative delivery service to low- and moderate-income geographies and individuals.

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

## **Community Development Services**

The bank provided a good level of community development service to the Lexington-Fayette AA. Employees provided events, training, and assistance to various community development organizations directed at their current needs. Bank employees demonstrated leadership by serving in 13 Board of Directors or committee positions in organizations that focus on the development needs of the community. Bank activities helped to support affordable housing, homeowner information, foreclosure prevention, and job training. Broader statewide activities with the potential to benefit this AA were included in this analysis. Chase also provides electronic benefits transfers for public assistance payments distributed throughout the state.

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

Based on limited-scope reviews, service test performance in the Owensboro AA is excellent and not inconsistent with the performance in the state overall. Performance in this AA further supported the excellent performance in the state as the deposits in the area represent over 13% of statewide deposits. Performance in the Bowling Green, Elizabethtown, and the non-metropolitan AAs was weaker, but considered adequate. Performance in the lower-rated limited-scope areas did not significantly impact the overall rating for the state of Kentucky. Refer to Table 15 in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

## State of Louisiana

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors supporting the ratings include:

- Good overall lending test performance is the result of excellent volumes of community development lending elevating adequate lending performance to High Satisfactory. The New Orleans full-scope AA had excellent lending performance due to the significantly positive level of community development lending, elevating otherwise good performance. The Baton Rouge full-scope AA had adequate lending performance and did not have the benefit of additional community development lending to support its lending performance.
- Excellent overall investment test performance is the result of the excellent performance in the New Orleans-Metairie-Kenner MSA and in most of the limited-scope AAs as well as the investments in the broader statewide and regional areas. These factors elevated the bank's investment test rating for the state to an excellent level, despite the adequate performance in the Baton Rouge MSA.
- Good service test performance is the result of the excellent performance in the Baton Rouge MSA and the adequate performance in the New Orleans-Metairie-Kenner MSA. The excellent performance in the Baton Rouge MSA is based primarily on an excellent branch and ATM distribution network. In the New Orleans-Metairie-Kenner MSA, branch distribution is adequate, after considering branches near to low- and moderate-income tracts. The bank provides good hours of service and an adequate level of community development services in both areas.

The bank's performance under the service test in Louisiana is rated High Satisfactory and reflects a good level of service overall.

### Description of Institution's Operations in the Rating Area

The bank has delineated 14 AAs within the state. Eight are in MSAs and six are in non-metropolitan areas. Within Louisiana, 40% of the bank's deposits are concentrated in the Baton Rouge MSA and 31% are in the New Orleans-Metairie-Kenner MSA; therefore, these two areas were selected for a full-scope review. The remaining AAs, including the combined non-metropolitan AAs, were analyzed using limited-scope procedures.

The bank is ranked second in the state in deposits with a 16.7% deposit market share. There are over 160 FDIC-insured depository institutions in the state overall, but the market is fairly concentrated with the top four banks accounting for nearly 54% of the entire market share. Statewide, the bank holds \$13.8 billion of deposits, which represents 2.6% of the bank's total deposits. The bank operates 155 branches and 210 deposit taking ATMs in Louisiana.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Louisiana is rated High Satisfactory. Based on a full-scope review, performance in the New Orleans-Metairie-Kenner MSA is excellent and in the Baton Rouge MSA is adequate. The limited-scope areas did not significantly impact lending test performance in the state.

### Lending Activity

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

Lending activity in the New Orleans-Metairie-Kenner MSA is excellent. Ranked second in deposit market share, the bank ranks third in market share for home purchase and home refinance loans among local deposit taking institutions and national lenders within the MSA. In home improvement lending, which is not a major product for the bank, the bank was ranked fifteenth. In addition, the bank's small business lending market share rank for deposit taking institutions is thirteenth, which is considered excellent with much competition and credit cards lenders taking 74% of the market share.

Lending activity in the Baton Rouge MSA is excellent. Ranked first in deposit market share, the bank also ranks third in market share for home purchase lending and fourth in home refinance lending among local deposit taking institutions and national lenders within the MSA. Home improvement lending market share is fifteenth for this MSA as well. In addition, the bank's small business lending market share rank for deposit taking institutions is eleventh, which is considered excellent with much competition and credit cards lenders taking 65% of the market share.

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

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

The distribution of loans within geographies of different income levels was adequate in the New Orleans-Metairie-Kenner MSA. Home purchase and home refinance lending were poor in the low-income geographies and adequate in the moderate-income geographies. Home improvement lending was adequate with adequate performance in low-income census tracts and good in the moderate-income census tracts. Consideration was given to the continued lack of housing stock in the low- and moderate-income geographies because of Hurricanes Katrina and Rita that occurred in 2005. Small business lending was excellent in both the low- and moderate-income geographies. We did not identify any conspicuous or unexplained gaps in lending patterns.

The distribution of loans within geographies of different income levels was poor in the Baton Rouge MSA. Home purchase and home refinance lending was very poor and home

improvement lending was good. Almost half of the available housing in the MSA is rental property limiting HMDA lending opportunities. Eleven percent of the housing is vacant. The penetration into both low- and moderate-income census tracts for small business loans was poor. We did not identify any conspicuous or unexplained gaps in lending patterns.

Refer to Table 13 in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

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

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

The distribution of loans to borrowers of different income levels was good in the New Orleans-Metairie-Kenner MSA. While the HMDA products were considered good, lending to businesses with different revenue sizes was only adequate. For the HMDA products, home purchase and home refinance lending was good, and home improvement was excellent. We considered the impact that 16% poverty levels had in the full-scope area for HMDA lending.

The distribution of loans to borrowers of different income levels was good in the Baton Rouge MSA. Home purchase, home improvement and home refinance lending were each considered good. We considered the impact that 16% poverty levels have in the full-scope area for home purchase lending. The borrower distribution of small loans to businesses is poor for the AA, which slightly offset the good HMDA performance.

### **Community Development Lending**

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

Given the strong volume and excellent responsiveness to identified needs, community development lending had a significant, positive impact on lending performance in the New Orleans-Metairie-Kenner MSA. There are ample opportunities within the MSA for community development and great needs, especially following the devastation from the Hurricanes Katrina and Rita that continue to impact the AA. The bank originated 32 loans totaling \$158.8 million or 32.9% of Tier 1 Capital allocated to the AA. The substantial majority of the bank's community development loans helped address the urgent needs of neighborhood revitalization and affordable housing, which were amplified by Hurricanes Katrina and Rita. One example of the responsiveness includes a \$26.1 million loan to help construct a 199-unit housing development for low-income residents. The funding addresses the need for affordable housing in the community as it provides replacement housing for Forest Towers East, a HUD 202 community severely damaged by Hurricane Katrina. It is part of a targeted redevelopment zone known as the Tulane Avenue Commercial Corridor.

Community development lending had a neutral impact on lending in the Baton Rouge AA. The bank originated seven community development loans totaling \$34 million. Half of the loans addressed affordable housing needs while the other half helped to revitalize or stabilize low- and moderate-income areas.

## Other Loan Data

Chase provided for consideration eight standby letters of credit totaling \$38.2 million in the New Orleans AA and one for \$10 million in the Baton Rouge AA that facilitated the creation of affordable housing. Refer to Table 1 Other in the state of Louisiana section of appendix D for facts and data on these letters of credit.

## Product Innovation and Flexibility

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

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Lafayette, Lake Charles, Monroe, Shreveport-Bossier City and the non-metropolitan AAs is not inconsistent with the bank's overall good performance under the lending test in Louisiana. In the Alexandria and Houma-Bayou Cane-Thibodaux AAs, the bank's performance is weaker than the bank's overall performance in the state, and is considered adequate. The Houma-Bayou Cane-Thibodaux area had generally adequate lending performance but did not have the volumes of community development lending that elevated performance in the rated area. The Alexandria AA had poor performance, but significantly positive levels of community development lending to elevate the rating to adequate. Performance in these AAs was not significant enough to affect the overall rating for the state of Louisiana. Refer to the Tables 1 through 12 in the state of Louisiana section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Louisiana is rated Outstanding. Based on full-scope reviews, performance is excellent in the New Orleans-Metairie-Kenner MSA and adequate in the Baton Rouge MSA. Excellent performance in most of the limited-scope AAs and in the broader statewide and regional areas with the potential to benefit the state elevated the bank's investment test rating for the state.

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

Performance in the New Orleans-Metairie-Kenner MSA is excellent. JPMCB funded 88 investments in the New Orleans-Metairie-Kenner MSA totaling \$181.6 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on nine prior period investments as of year-end 2010 was \$3.5 million. Additionally, approximately \$2.3 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the

community development needs of the area. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the New Orleans-Metairie-Kenner MSA totaled \$31.9 million which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Performance in the Baton Rouge AA is adequate. JPMCB funded 76 investments in the Baton Rouge MSA totaling \$17.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 12 prior period investments as of year-end 2010 was \$5.6 million. Additionally, approximately \$0.2 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development needs in the AA is adequate, especially as it relates to affordable housing and community services. The largest investment in the Baton Rouge MSA totaled \$13.3 million which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing, community services and activities that revitalize or stabilize LMI geographies.

The significant volume of investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and helped to elevate the overall state rating under the investment test. The bank made investments and grants to organizations and funds throughout the state of Louisiana and in a broader regional area around Louisiana, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made six investments for \$3.5 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 26 investments with remaining balances totaling \$2.3 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 30 investments for \$86.5 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 12 investments with remaining balances totaling \$3.8 million in the broader regional area with the potential to benefit the bank's AAs. The combined volume of these investments in the broader statewide and regional areas in both the current and prior periods represents over a third of the direct investments in the AAs.

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

Performance in most of the limited-scope AAs supports the Outstanding investment test rating for Louisiana. Based on limited-scope reviews, the bank's performance under the investment test in the Alexandria, Houma-Bayou Cane-Thibodaux, Lafayette, Lake Charles, and Monroe AAs and the Louisiana Non-MSA is excellent and not inconsistent with the overall excellent performance in Louisiana. These AAs represent 23% of the bank's deposits in the state. Performance in the Shreveport-Bossier City AA is poor and significantly weaker than the



overall performance in Louisiana. Weaker performance is due to a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Louisiana section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Louisiana is rated High Satisfactory and reflects a good level of service overall. In the Baton Rouge AA, the bank provides an excellent level of retail services and an adequate level of community development services. In the New Orleans-Metairie-Kenner AA, branch distribution is adequate after considering the number of branches located near low- and moderate-income areas and alternative delivery methods. The level of community development services is adequate in both full-scope areas. Performance in the limited-scope AAs did not significantly impact the service test rating for Louisiana.

### **Retail Banking Services**

A full-scope review of the bank's performance in the Baton Rouge MSA demonstrates excellent performance, based primarily on excellent branch and ATM distribution with services readily accessible to all portions of this AA. The percentage of the bank's branches located in low- and moderate-income geographies exceeds the percentage of the population residing in the Baton Rouge MSA. Branch hours are good and do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies in the AA. The record of opening and closing branch offices has not adversely affected the accessibility of delivery systems. A net of one branch office closed during the evaluation period in the AA, but this activity did not impact low- or moderate-income areas. The ATM network offers an excellent alternative delivery service to low- and moderate-income geographies and individuals.

A full-scope review of the bank's performance in the New Orleans-Metairie-Kenner MSA demonstrates adequate performance, based primarily on adequate branch and ATM distribution. Retail branch distribution in the New Orleans-Metairie-Kenner MSA is considered adequate, after considering the number of branches in middle- and upper-income geographies that are located near low- and moderate-income geographies. As a result, accessibility to bank services for low- and moderate-income geographies improves from a poor to a good level. Otherwise, the percentage of branches located in both low- and moderate-income geographies is well below the percentage of population living in low- and moderate-income areas. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies in the AA. The record of opening and closing branch offices has adversely affected the accessibility of delivery systems. The bank closed a net of two branch offices during the evaluation period in the New Orleans-Metairie-Kenner AA, including one branch office located in a low-income geography. The ATM network offers an adequate alternative delivery service to low- and moderate-income geographies and individuals.

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

### **Community Development Services**

The bank's responsiveness to the community development service needs in both full-scope AAs is adequate. The New Orleans-Metairie-Kenner MSA evaluation included two specific broader statewide services because the organization has an office in the MSA and the potential to directly benefit the community. The Baton Rouge MSA evaluation included services provided in the broader statewide areas with potential to benefit this full-scope AA. Bank participation in community development services included work with revitalization / stabilization projects, economic development technical assistance, conducting homebuyer seminars, and other educational forums, as well as providing leadership through board and committee memberships. However, the level of activity declined markedly from prior periods. Numerous opportunities exist for the bank to work with organizations that target community development needs in low- to moderate-income areas, including areas impacted by Hurricanes Katrina and Rita in 2005 and the Gulf oil spill in 2010. Recovery from these natural disasters along with the economic downturn has left the AAs with enduring needs for affordable housing, economic development, and revitalization programs.

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

Performance in the limited-scope AAs did not significantly impact the service test rating for Louisiana. Based on limited-scope reviews, service test performance in the Monroe MSA is not inconsistent with the bank's overall High Satisfactory performance under the service test in Louisiana. In the Alexandria, Houma-Bayou Cane-Thibodaux, Lafayette, Lake Charles, Shreveport-Bossier City, and the non-MSA AAs, the bank's performance is weaker than the bank's overall performance in the state. This weaker performance results from there being fewer branches in low- and moderate-income geographies, in part because branch closings negatively impacted several AAs. The state rating is weighted heavily toward the performance of the full-scope AAs, which have 71% of state deposits. Refer to Table 15 in the state of Louisiana section of appendix D for the facts and data that support these conclusions.

## State of Nevada

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>Low Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Low Satisfactory</u></b>

The major factors supporting the ratings include:

- Good distribution of loans to borrowers of different income levels and excellent lending activity offset by very poor distribution of loans within geographies of different income levels were the primary reasons behind the lending test rating.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- An adequate branch distribution network, after considering the number of branches located near to low- and moderate-income areas, resulting in an adequate level of performance. Good hours of service, adequate branch opening performance, and an adequate record of community development services further support the service test rating.

## Description of Institution's Operations in the Rating Area

There is one AA within the state – the Las Vegas-Paradise MSA. As a result, this area received a full-scope review. The state is a new rating area for the bank as a result of its purchase from the FDIC of certain assets of WaMu, which failed in 2008.

The bank operates over 40 branch offices and over 60 deposit taking ATMs within the state. For this state rating area, 37 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. As of June 30, 2010, the bank was ranked 10<sup>th</sup> in deposits in the state with a 0.6% market share. Over 75% of the deposits in the state are held by Citibank, N.A. and Charles Schwab Bank. The bank holds \$1.1 billion of deposits in the state, which represents 0.2% of the bank's total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

The bank's performance under the lending test in Nevada is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Las Vegas-Paradise, NV MSA is adequate.

## Lending Activity

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

Lending activity is excellent. The bank is ranked ninth in deposit market share. The bank originated a high volume of home purchase loans, home improvement loans, and refinance loans. The bank originated an adequate volume of small business loans. The bank ranked seventh, fifth, fourth, and twenty-fourth in home purchase, home improvement, home refinance and small business lending, respectively.

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

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

The distribution of loans within geographies of different income levels is very poor. The distribution for home improvement, home refinance, and multi-family lending reflects very poor performance overall and in both low- and moderate-income geographies. Home purchase lending has very poor performance in moderate-income geographies and while the bank's performance in the low-income geographies is excellent, there is little owner-occupied housing available, so the performance carries little weight. Overall, Chase had adequate distribution of small loans to businesses based on adequate penetration in both low- and moderate-income census tracts, with excellent market share for 2009. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different income levels was good. The home purchase and home improvement lending had excellent performance, with good performance for home refinance lending. Home purchase and home improvement lending had excellent distribution to both low- and moderate-income borrowers. Home refinance lending had adequate performance in the low-income census tracts, good performance in the moderate-income tracts with an excellent market share. Loans to businesses with different income levels were adequate. We also considered the impact that the economy had on small businesses and the decline in tourism and hospitality services.

### **Community Development Lending**

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

Community development lending had a neutral impact on lending performance in the MSA. The bank originated one community development loan totaling \$655 thousand during this evaluation period.

### **Product Innovation and Flexibility**

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

## **INVESTMENT TEST**

The bank's performance under the investment test in Nevada is rated Outstanding. Based on a full-scope review, performance is excellent in the Las Vegas-Paradise MSA.

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

Based on significant volume, investment test performance in the Las Vegas AA is excellent. JPMCB funded 21 investments in the MSA totaling \$16.8 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 18 prior period investments as of year-end 2010 was \$21.8 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Las Vegas-Paradise MSA totaled \$9.0 million which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

## **SERVICE TEST**

The bank's performance under the service test in Nevada is rated Low Satisfactory. A full-scope review of the bank's performance in the Las Vegas-Paradise AA reveals an adequate level of service. There were no limited-scope AAs in Nevada.

## **Retail Banking Services**

The distribution of bank branches is adequate, after giving consideration to the number of middle- and upper-income branch locations (10) that are within one-half mile of low- and moderate-income geographies. Accessibility to these branches raises an otherwise poor distribution network to an adequate level. There are no branches in low-income tracts, and the percentage of branches located in the moderate-income geographies is considerably below the population living in such geographies. Branch opening and closing activity is adequate as the bank opened four new branch offices during the evaluation period; however, none of the new branches were in low- or moderate-income tracts. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network does not augment the delivery of banking services to low- and moderate-income geographies or individuals.

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

## **Community Development Services**

The bank provided an adequate level of community development services, given the shorter evaluation period and low market penetration. Bank employees worked with local chapters of

national organizations focused on community development to enhance affordable housing. They provided financial training in a school located in a low- to moderate-income area and offered mortgage counseling at a nearby branch. With the very high mortgage foreclosure rate in this MSA, mortgage counseling is considered a critical need. This full-scope review included community development services provided in the broader statewide area with the potential to impact this AA. This consisted of electronic benefit programs, whereby government benefits are distributed by the bank on debit cards to predominately low- and moderate-income individuals. Refer to Table 15 in the state of Nevada section of appendix D for the facts and data that support these conclusions.

## State of New Jersey

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Low Satisfactory</u></b>

The major factors supporting the ratings include:

- Good distribution of loans to borrowers of different income levels and excellent lending activity offset by adequate distribution of loans within geographies of different income levels were the primary reasons behind the lending test rating.
- Excellent responsiveness to the investment needs of the full-scope area, based on the volume of qualified investments. Excellent performance in the broader statewide and regional areas offset the weaker performance in the limited scope area.
- Adequate service test performance resulted from adequate branch distribution, after considering the number of branches located near to low- and moderate-income areas. The hours of service and the record of opening branches are good. Community development services are good, when broader statewide services with the potential to benefit one or more AAs in the state are considered.

## Description of Institution's Operations in the Rating Area

Chase has delineated five AAs within the state. Three of these areas are within the New York multistate MSA, which is a separate rating area from the state. (Please see the New York-Northern New Jersey-Long Island MMSA rating area for a description of the bank's operations in that rating area.) The remaining AAs in the state are within the Trenton-Ewing MSA and the New Jersey portion of the Allentown-Bethlehem-Easton MSA. Of the bank's deposits within the state, 82% are in the Trenton-Ewing MSA; therefore, this area was selected for a full-scope review. The remaining AA was analyzed using limited-scope procedures.

Excluding the multistate area, the bank operates 11 branches and 15 deposit taking ATMs in the state, competing against over 70 FDIC-insured depository institutions. For this state rating area, two of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. The bank holds \$301 million of deposits in the non-multistate portion of the state, which represents 0.06% of the bank's total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New Jersey is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Trenton-Ewing, NJ MSA is good. The limited-scope area did not significantly impact lending test performance in the state.

## **Lending Activity**

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

Lending activity is excellent. The bank has limited deposit presence in the MSA, ranked fifteenth with a deposit market share of 2.1%. Lending ranks are generally higher and lending market shares for all products exceeds the bank's deposit market share. The bank made an excellent volume of loans, especially considering the small deposit presence in the MSA.

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

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

The distribution of loans within geographies of different income levels was adequate. While the overall geographic distributions were poor for the HMDA products, an adequate performance for small business lending was enough to elevate the overall rating to adequate. There were various underlying reasons for the conclusions for the different products. Home purchase lending was generally excellent in low-income geographies and good in moderate-income geographies, but the conclusion was reduced to an overall adequate because of poor market share performance in low- and moderate-income geographies. The home improvement loan product had good performance overall due to good performance in both low- and moderate-income tracts. There was limited market share activity for this product because of limited lending by all lenders, so we gave this performance minimal weighting. Small business performance had poor low-income tract performance and adequate penetration into moderate-income census tracts, which was elevated to an adequate level by excellent market share performance. Refinance lending was poor overall with poor performance in low- and moderate-income tracts and poor market share performance. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different income levels is good. When we considered the impact of 11% poverty levels on the ability to obtain mortgage loans, all HMDA lending is considered good. We were unable to analyze small business lending because of the lack of business revenue data.

## **Community Development Lending**

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



The dollar volume of community development loans reflects responsiveness to identified needs and had a positive impact on lending performance in the state. The bank originated three community development loans totaling \$2.1 million or 7.5% of allocated Tier 1 Capital. The loans addressed affordable housing efforts.

### **Product Innovation and Flexibility**

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

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

Based on limited-scope reviews, the bank's performance under the lending test in the Allentown MSA is weaker than the bank's High Satisfactory performance in the state. The Allentown area had generally adequate lending performance in both the geographic and borrower lending tests. Performance in this area was not significant enough to impact the overall lending test rating for the state of New Jersey. Refer to the Tables 1 through 12 in the state of New Jersey section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in New Jersey is rated Outstanding. Based on a full-scope review, performance is excellent in the Trenton-Ewing MSA. Performance in the limited-scope AA negatively impacted the investment test rating for the state. However, this impact was offset by the significant level of investments in broader statewide and regional areas with the potential to benefit the AAs, which helped to elevate the performance for the state to an excellent level.

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

Based on significant volume, investment test performance in the Trenton AA is excellent. JPMCB funded 14 investments in the MSA totaling \$6.3 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on eight prior period investments as of year-end 2010 was \$2.1 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Trenton-Ewing MSA totaled \$4.4 million which consisted of an investment in a project designed to provide affordable rental housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and helped to elevate the overall state rating.

The bank made investments and grants to organizations and funds throughout the state of New Jersey and in a broader regional area around New Jersey, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 18 investments for \$35.6 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 20 investments with remaining balances totaling \$6.3 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 10 investments for \$35.8 million in the broader regional area with the potential to benefit the bank's AAs. The volume of investments in these areas was significantly higher than the volume of investments in the AAs.

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

Based on a limited-scope review, the bank's performance under the investment test in the New Jersey portion of the Allentown MSA is very poor and significantly weaker than the overall excellent performance in New Jersey. Weaker performance is based on the lack of qualified investments in the AA. Performance in the limited-scope AA negatively impacted the investment test rating for New Jersey. However, this weaker performance was offset by the volume of broader statewide and regional area investments. Refer to the Table 14 in the state of New Jersey section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in New Jersey is rated Low Satisfactory. A full-scope review of the Trenton-Ewing AA demonstrates that the bank's performance is adequate.

### **Retail Banking Services**

A full-scope review of performance in the Trenton-Ewing MSA revealed the distribution of branches and services is adequate. There are nine branches and 13 deposit taking ATMs in this AA and all are located in middle- and upper-income geographies. The bank opened four branches and nine ATMs and acquired one branch during this evaluation period. Three new branches are in middle-income areas and two are in upper-income tracts. The record of opening branch offices is good and accessibility of delivery systems has improved. There have been no branches closed. Bank customers from low- and moderate-income geographies have access to two branches which are located within one mile from low- or moderate-income tracts. Branch hours do not vary in a way that inconveniences certain portions of the AAs. Management reported they have developed a plan to add branches in the Trenton AA in low- or moderate-income areas. Additional information provided by the bank indicates that the current branches and ATMs are serving low- and moderate-income households in the AA.

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

## **Community Development Services**

Chase maintains a good level of community development service when broader statewide services are considered, which benefit the AAs. Employees provide a broad range of community development services to 14 local organizations, with a focus on affordable housing for low- and moderate-income families, an identified need in the community. Employees served in leadership roles for organizations providing affordable housing, homeownership counseling, and foreclosure prevention, assistance to small businesses, neighborhood revitalization, financial literacy, and social services.

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

Based on a limited-scope review, the bank's performance under the service test in the Allentown AA (Warren County, NJ) is not inconsistent with the bank's overall Low Satisfactory performance under the service test in New Jersey. Performance in the limited-scope area did not materially impact the overall state rating. Refer to Table 15 in the state of New Jersey section of appendix D for the facts and data that support these conclusions.

## State of New York

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors that support this rating include:

- Excellent volumes of community development lending elevated a good distribution of loans to borrowers of different income levels, excellent lending activity, and adequate distribution in geographies of different income levels to an excellent level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Service test performance is considered good, based on good branch and ATM distribution, good branch hours and a good record of opening/closing branches. The level of community development services is adequate.

## Description of Institution's Operations in the Rating Area

Chase has delineated ten AAs within the state. Two of these areas are within the New York-Northern New Jersey-Long Island MMSA. This MMSA is a separate rating area from the state. (Please see the New York-Northern New Jersey-Long Island MMSA rating area for a description of the bank's operations in that area.) The remaining AAs in the state are in MSAs, except for one non-metropolitan area. Of the rating area deposits, 45% are concentrated in the Rochester AA. Therefore, this area was selected for a full-scope review. The non-metropolitan area of Sullivan County was also selected for a full-scope review because it is a new area for the bank as a result of a purchase of several branches from another bank. The remaining AAs were analyzed using limited-scope procedures.

Excluding the multistate area, the bank operates over 80 branches and over 110 deposit taking ATMs in this portion of the state. Chase holds \$3.1 billion of deposits in this portion of the state, which represents 0.6% of the bank's total deposits. As such, the bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in New York is rated Outstanding. Based on a full-scope review, the bank's performance in the Rochester AA is excellent and in the non-metropolitan MSA (Sullivan County) is good. Excellent community development lending and lending activity support this conclusion. Performance in the limited-scope AAs did not impact the lending test rating in New York.

## **Lending Activity**

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

Lending activity is excellent. The bank originated a high volume of home purchase, and refinance loans in the Rochester AA. The bank originated a good level of loans to small businesses. The bank has no market share for home improvement lending for 2009. Many of the financial institutions offering mortgage loans in the AA do not have deposit taking facilities in the area. When compared to only those institutions physically located in the AA, the bank's rank improves for refinance loans, home purchase and small business loans.

Lending activity in the non-metropolitan MSA (Sullivan County) is excellent. The bank is ranked ninth out of eleven banks in the MSA. Home purchase lending rank for the bank is fifth and home refinance rank is fourth among local deposit taking institutions and national lenders within the MSA. The bank has no market share for home improvement lending for 2009. In addition, the bank's small business lending market share rank for deposit taking institutions is fifteenth, which is considered excellent with much competition and credit cards lenders taking 71% of the market share.

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

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

The distribution of loans within geographies of different income levels was adequate in the Rochester MSA. Home purchase and home improvement lending was excellent in both the low- and moderate-income. Home refinance lending was poor with poor performance in low-income census tracts and adequate in the moderate-income census tracts. Small business lending was adequate in the low-income geographies and good in the moderate-income geographies, with an adequate market share, giving an overall good rating. We did not identify any conspicuous or unexplained gaps in lending patterns.

The distribution of loans within geographies of different income levels was adequate in the non-metropolitan MSA (Sullivan County). There are no low-income census tracts in Sullivan County, so all weight was placed on the performance in moderate-income tracts. Additionally, the bank did not make a significant number of home improvement loans in this AA, so more weight was placed on the other HMDA products. Home purchase lending performance was poor while home refinance lending performance was excellent. Almost one quarter of the available housing in the MSA is rental property limiting HMDA lending opportunities. Thirty-eight percent of the housing in the MSA is vacant. The penetration into both low- and moderate-income census tracts for small business loans was adequate and good, respectively. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was good in the Rochester MSA. While the HMDA products were considered good, lending to businesses with different revenue sizes was poor. For the HMDA products, home purchase lending was excellent, while home improvement and home refinance lending was good. We considered the impact that 13% poverty levels had in the full-scope area for HMDA lending.

The distribution of loans to borrowers of different income levels was poor in the non-metropolitan MSA (Sullivan County). Home purchase lending performance was poor and home refinance lending was considered adequate. We considered the impact that 17% poverty level has in the full-scope area for home purchase lending. The borrower distribution of small loans to businesses is poor for the AA.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance in the Rochester AA. Chase originated 27 loans totaling over \$53 million during this evaluation period. The dollar volume represents 34.5% of Tier 1 Capital allocated to the Rochester AA.

Community development lending had a significant, positive impact on lending performance in the non-metropolitan AA. The bank originated three loans totaling over \$21.7 million during this evaluation period. The dollar volume represents close to 400% of Tier 1 Capital allocated to the Sullivan County AA. The bank demonstrated responsiveness by providing over \$20.7 million in loans to finance capital improvement projects for a school district's existing facilities. Over half of the students in this school district are from low- and moderate-income families.

## **Other Loan Data**

Chase provided for consideration eight standby letters of credit totaling \$116.7 million that have a qualified community development purpose. The substantial majority facilitated the creation or rehabilitation of affordable housing. Refer to Table 1 Other in the state of New York section of appendix D for facts and data on these letters of credit.

## **Product Innovation and Flexibility**

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

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Albany-Schenectady-Troy, Binghamton, Poughkeepsie-Newburgh-Middletown, and Syracuse AAs is not inconsistent with the bank's overall excellent performance under the lending test in the state of New York. In the Buffalo-Niagara Falls and Kingston AAs, the bank's performance is weaker than the bank's overall performance in the state, but considered good. The Buffalo AA had adequate overall combined geographic and borrower distribution performance, but had very positive levels of community development lending to elevate the rating. Lending performance in the Kingston AA was overall good with excellent lending activity to elevate an adequate borrower distribution performance. Performance in the limited-scope AAs did not have an impact on the overall rating for the state of New York. Refer to the Tables 1 through 12 in the state of New York section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in New York is rated Outstanding. Based on full-scope reviews, performance is excellent in the Rochester MSA and the New York Non-MSA. Performance in the limited-scope AAs did not impact the investment test rating for the state.

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

Based on significant volume, investment test performance in the Rochester AA is excellent. JPMCB funded 69 investments in the Rochester MSA totaling \$33.2 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 27 prior period investments as of year-end 2010 was \$5.4 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Rochester MSA totaled \$11.4 million which consisted of a New Markets Tax Credit investment in a revitalization/stabilization project for the renovation of a theatre building. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Chase funded one investment in the New York Non-MSA totaling \$0.9 million which consisted of an investment to provide affordable rental housing through LIHTC. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing.

The bank also made investments and grants to organizations and funds throughout the state of New York and in a broader regional area around New York, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 17

investments for \$28.8 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 29 investments with remaining balances totaling \$4.5 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made three investments for \$6.0 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 22 investments with remaining balances totaling \$3.2 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas further support the bank's overall performance under the investment test for the state.

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

Performance in limited-scope AAs did not negatively impact the investment test rating for New York. Based on limited-scope reviews, the bank's performance under the investment test in the Albany-Schenectady-Troy, Binghamton, Buffalo-Niagara Falls, Kingston, and Poughkeepsie-Newburg-Middletown AAs is excellent and not inconsistent with the overall performance in New York. Performance in the Syracuse MSA is adequate and weaker than the overall performance in New York. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of New York section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in New York is rated High Satisfactory. Performance in the full-scope AAs for retail services varies: Rochester MSA performance is good and NY non-MSA performance is adequate. Community development services are provided at an adequate level. Performance in several of the limited-scope AAs supports the service test rating for New York.

### **Retail Banking Services**

The bank's performance in New York is good overall. The distribution of branches within the Rochester AA is good and services are accessible to essentially all portions of the AA. The percentage of branches in low- and moderate-income geographies is slightly below the percentage of the population residing in those geographies. When giving consideration to middle- and upper-income branch locations (15) that are in close proximity to low- and moderate-income geographies, the overall branch distribution is strengthened.

The NY non-MSA AA reports minimal low- or moderate-income geographies; only 5% of the area's population resides in the moderate-income geography and none resides in the low-income geographies. There are only two branches in the NY non-MSA AA and service is considered adequate. No branch offices were opened or closed during the evaluation period in either full-scope AA. Branch hours do not vary in a way that inconveniences certain portions of the AA. The ATM network distribution offers good alternative delivery to low- and moderate-income.



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

### **Community Development Services**

The bank's record of providing CD services is adequate in both the Rochester AA and the NY non-MSA (Sullivan County) areas. In the Rochester AA, CD opportunities are abundant and employees provided leadership by serving in 17 board and/or committee positions for 18 community development organizations. There are no reported community development service activities in the NY non-metropolitan Sullivan county AA. Management indicated this is a very small market, with only two branches and a low market share. Given the context of this market, the lack of CD activity is adequate.

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

Based on limited-scope reviews, the bank's performance under the service test in the Binghamton and Buffalo-Niagara Falls AAs is not inconsistent with the bank's overall High Satisfactory performance under the service test in New York. In the Poughkeepsie-Newburgh-Middletown AA, the bank's performance is stronger than the bank's overall performance in the state due to better branch distribution. In the Albany-Schenectady-Troy, Syracuse, and Kingston AAs, the bank's performance is weaker than the bank's overall performance in the state. This weaker performance is primarily due to weaker branch distribution. Refer to Table 15 in the state of New York section of appendix D for the facts and data that support these conclusions.

## State of Ohio

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>High Satisfactory</u></b>

The major factors that support this rating include:

- Positive community development lending and a good distribution of loans to borrowers and businesses with different income levels, as well as excellent lending activity were the primary reasons for the High Satisfactory lending test rating.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Service test performance in the full-scope area was excellent, after considering branches which are near to low- and moderate-income areas. Weaker performance in several of the limited-scope areas had a negative impact on the bank's overall performance, which resulted in an overall good level for the state. Business hours and the record of community development services are also good.

## Description of Institution's Operations in the Rating Area

Chase has delineated 27 AAs within the state. Two of these areas are within multistate MSAs: the Cincinnati-Middletown, OH-KY-IN MMSA and the Wheeling, WV-OH MMSA. These MMSAs are separate rating areas from the state. (Please see the respective MMSA rating areas for a description of the bank's operations in those areas.) The remaining AAs in the state consist of 11 MSAs and 14 non-metropolitan areas. In the remaining part of the state, 49% of the bank's deposits are concentrated in the Columbus AA. Therefore, this area was selected for a full-scope review. The remaining MSAs and the combined non-metropolitan areas were analyzed using limited-scope procedures.

Excluding the multistate area, the bank operates 260 branches and over 350 deposit taking ATMs in this portion of the state. Chase holds \$16.5 billion of deposits in this portion of the state, which represents 9.3% of the deposit market and ranking the bank as fourth overall. There are over 230 FDIC-insured depository institutions operating in the rating area, providing strong completion for the bank. Despite the number of competitors, the top four banks account for nearly 45% of the deposit market. The deposits in this rating area represent 3.1% of the bank's total deposits.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Ohio is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Columbus, OH MSA is good. Excellent

community development lending and lending activity support this conclusion. Performance in the limited-scope AAs did not impact the lending test rating in the state.

## **Lending Activity**

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

Lending activity in the Columbus MSA is excellent. The bank is ranked second out of fifty-six banks in the MSA for deposits. The bank is ranked third for home purchase lending and second for home refinance rank among local deposit taking institutions and national lenders within the MSA. The bank is ranked fifteenth for home improvement lending with 110 lenders in the MSA. The bank's small business lending market share rank for deposit taking institutions is sixteenth, which is considered excellent with much competition and credit card lenders, including the bank's own affiliate, taking 73% of the market share.

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

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

The distribution of loans into geographies with different income levels is poor. Overall HMDA performance is poor due to poor distribution of loans for home refinance that offset good home improvement and adequate home purchase lending performance. Home refinance was poor because of the poor penetration into low- and moderate-income census tracts and poor market shares in low- and moderate-income tracts. Small business lending was good. We did not identify any conspicuous or unexplained gaps in lending patterns.

Refer to Table 13 in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

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

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

The distribution of loans to borrowers of different income levels was good. For home purchase lending, excellent performance to moderate-income borrowers was offset by adequate performance among low-income borrowers, resulting in overall good performance. Performance for home improvement lending was excellent offset by adequate performance for refinance loans. The distribution of loans to businesses with different revenue sizes was adequate, which slightly offset the good HMDA performance.

## **Community Development Lending**

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

Community development lending had a positive impact on lending test performance in the Columbus MSA. The bank made 25 community development loans totaling \$58.8 million, or 6.4% of Tier 1 Capital allocated to the AA. The substantial majority of the dollar volume addressed affordable housing needs.

### **Other Loan Data**

Chase provided for consideration two standby letters of credit totaling \$6 million that have a qualified community development purpose. Refer to Table 1 Other in the state of Ohio section of appendix D for facts and data on these letters of credit.

### **Product Innovation and Flexibility**

Flexible or innovative loan programs had a positive impact on lending performance in the area. In the Columbus AA, the bank made nearly eight thousand mortgage loans under various flexible mortgage programs.

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

Based on limited-scope reviews, the bank's performance under the lending test in the Akron, Cleveland-Elyria-Mentor, Dayton, Parkersburg-Marietta, Springfield, and non-metropolitan AAs is not inconsistent with the bank's overall good performance under the lending test in the state of Ohio. In the Canton-Massillon, Lima, Mansfield, Weirton-Steubenville, Youngstown-Warren-Boardman MSA, the bank's performance is weaker, but adequate, than the bank's overall performance in the state. These MSAs have similar performance to the state, but do not have enough community development lending to elevate the adequate performance to good. Performance in the limited-scope AAs did not have an impact on the overall rating for the state of Ohio. Refer to the Tables 1 through 12 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Ohio is rated Outstanding. Based on a full-scope review, performance is excellent in the Columbus MSA. Performance in the limited-scope AAs did not significantly impact the investment test rating for the state.

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

Based on significant volume, investment test performance in the Columbus AA is excellent. JPMCB funded 179 investments in the MSA totaling \$44.1 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 21 prior period investments as of year-end 2010 was \$10.2 million. Additionally, approximately \$0.4 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community

development needs of the area. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Columbus MSA totaled \$7.5 million which consisted of an investment in a project designed to provide rent subsidized housing for individuals at approximately 30% of their income. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Ohio and in a broader regional area around Ohio, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 32 investments for \$35.4 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 35 investments with remaining balances totaling \$6.9 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 13 investments for \$2.9 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas further support the bank's overall performance under the investment test for the state.

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

Performance in limited-scope AAs did not significantly impact the investment test rating for Ohio. Based on limited-scope reviews, the bank's performance under the investment test in the Akron, Canton-Massillon, Cleveland-Elyria-Mentor, Dayton, Parkersburg-Marietta, Springfield, Steubenville-Weirton and Youngstown-Warren-Boardman MSAs and the Ohio Non-MSA is excellent and not inconsistent with the overall performance in Ohio. Performance in the Mansfield MSA is adequate and weaker than the overall performance in Ohio. Performance in the Lima MSA is very poor and significantly weaker than the overall performance in Ohio. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Ohio is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Columbus AA is excellent. The full-scope review of the Columbus AA determined the bank provides an excellent level of retail services and a good level of community development services. Performance in several of the limited-scope AAs had a negative impact on the state rating.

### **Retail Banking Services**

The distribution of bank branches in the Columbus AA is excellent, after considering branches near to low- and moderate-income areas. As a result, services are readily accessible to all

portions of the full-scope AA. The percentage of bank branches in low-income geographies exceeds the population residing in those geographies and is excellent. The number of branches in moderate-income geographies is below the percentage of the population in moderate-income geographies, but is good. When giving consideration to the number of middle- and upper-income branches (16) that are in close proximity to both low- and moderate-income geographies, accessibility improves. The record of opening and closing of branch offices has generally not adversely affected the accessibility of delivery systems. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network offers an alternative delivery service to low- and moderate-income geographies and individuals.

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

### **Community Development Services**

Chase maintains a good level of responsiveness to the community development service needs in the Columbus AA. Employees provided leadership and/or technical assistance by serving as board members or on loan committees for over 40 CD organizations that are responsive to a variety of community needs. The bank co-sponsored events with CD organizations that focus on affordable housing for low- and moderate-income families, homeownership counseling, foreclosure prevention, assistance to small businesses, neighborhood revitalization, financial literacy, and social services.

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

Performance in some of the limited-scope AAs had a negative impact on the state rating. In the Canton-Massillon, Parkersburg-Marietta, Springfield, and Youngstown-Warren-Boardman AAs, the bank's performance is stronger than the bank's overall performance in the state, due to readily accessible branch distribution. In the Akron, Dayton, Lima, Steubenville-Weirton, and the non-metropolitan AAs, the bank's performance is not inconsistent with the bank's overall performance in the state. These AAs represent over 28% of the bank's deposits in the state. The bank's performance in the Cleveland-Elyria-Mentor and Mansfield AAs is weaker than the bank's overall performance in the state primarily due to less accessible branch distribution. The limited-scope AAs exhibiting performance which was weaker than the overall performance in the state had a negative impact on the state of Ohio service test rating as they represent over 13% of the deposits in the state. Refer to Table 15 in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## State of Oklahoma

<b>CRA rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>Low Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Low Satisfactory</u></b>

The major factors that support this rating include:

- Good distributions of loans to borrowers of different income levels and good lending activity was offset by adequate distribution in geographies of different income resulting in the lending test rating of Low Satisfactory.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Branch distribution is adequate while the ATM distribution is excellent. Good hours of service further support the rating of Low Satisfactory.

## Description of Institution's Operations in the Rating Area

The bank has delineated two AAs within the state, both in MSAs. Within Oklahoma, 78% of the bank's deposits are concentrated in the Oklahoma City AA; therefore, it was selected for a full-scope review. The remaining AA was analyzed using limited-scope procedures.

Chase operates over 30 branches as well as 30 deposit taking ATMs in Oklahoma. Statewide, the bank ranks sixth of over 260 FDIC-insured depository institutions, with a 4.2% market share. The bank's deposits of \$2.9 billion in the state represent 0.5% of its total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Oklahoma is rated Low Satisfactory. Based on a full-scope review, the bank's performance in the Oklahoma City AA is adequate. Performance in the limited-scope AA did not materially impact the lending test rating for the state.

### Lending Activity

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

Lending activity is good. The bank has 9% of the deposit market share in the Oklahoma City AA, with a second place rank. The bank originated a large volume of both home purchase and refinance loans in the AA with a sixth and seventh place ranking, respectively. The bank has

no market share for home improvement lending for 2009. The bank also competes with a large number of credit card banks, including the bank's credit card affiliate, for small business loans.

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

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

The distribution of loans within geographies of different income levels is adequate. Excellent small business performance was offset by poor overall performance for the HMDA related products. The distribution of home purchase loans within both low- and moderate-income geographies was poor. Home improvement lending was adequate with very poor penetration into low-income census tracts and excellent penetration into moderate-income tracts. Refinance lending was poor with very poor performance in low-income census tracts and poor performance in moderate-income tracts. For the refinance product, we noted good market shares in the low- and moderate-income geographies, which helped support an overall conclusion of poor performance for that product. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was good in the Oklahoma City MSA. While the HMDA products were considered good, lending to businesses with different revenue sizes was adequate. For the HMDA products, home purchase and home refinance lending was good, while home improvement lending was adequate. We considered the impact that 15% poverty levels had in the full-scope area for HMDA lending.

### **Community Development Lending**

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

Community development lending had a neutral impact on lending performance in the Oklahoma City AA. The bank originated one community development loan totaling \$6.3 million during this evaluation period.

### **Product Innovation and Flexibility**

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



## Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the lending test in the Tulsa AA is stronger than the bank's overall adequate performance under the lending test in Oklahoma and is considered good. Very positive community development lending in the Tulsa AA elevated the bank's otherwise adequate lending performance to a good level. Refer to the Tables 1 through 12 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Oklahoma is rated Outstanding. Based on a full-scope review, performance in the Oklahoma City MSA is excellent. Performance in the limited-scope AAs did not significantly impact the investment test rating for the state.

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

Based on significant volume, investment test performance in the Oklahoma City AA is excellent. JPMCB funded 52 investments in the MSA totaling nearly \$10.0 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 13 prior period investments as of year-end 2010 was \$5.6 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Oklahoma City MSA totaled \$2.5 million which consisted of an investment in a project designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

The bank also made investments and grants to organizations and funds throughout the state of Oklahoma and in a broader regional area around Oklahoma, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 13 investments for \$7.6 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 18 investments with remaining balances totaling \$3.0 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 15 investments for \$20.0 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 60 investments with remaining balances totaling \$11.3 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

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

Based on a limited-scope review, the bank's performance under the investment test in the Tulsa AA is good, but weaker than the overall excellent performance in Oklahoma. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Performance in the limited-scope AA did not negatively impact the investment test rating for Oklahoma. Refer to the Table 14 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Oklahoma is rated Low Satisfactory. Based on full-scope review, the bank's performance in the Oklahoma City AA is at an adequate level for retail services while community development services are at a poor level. Performance in the limited-scope AA did not materially impact the service test rating for Oklahoma.

### **Retail Banking Services**

The distribution of bank branches in low- and moderate-income geographies of the Oklahoma City AA is significantly below the population residing in these geographies. However, when giving consideration to branch locations that are in close proximity to low- and moderate-income geographies, services are reasonably accessible for low- and moderate-income geographies and individuals. There were no opening and closing of branches, so this factor has not affected accessibility of delivery systems in the full-scope AA. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network offers an alternative delivery system to low- and moderate-income geographies and individuals in the AA. Traditional banking services are augmented by the bank's Rapid Cash Program. Seventy-one percent of the Rapid Cash transactions generated in the Oklahoma City AA originated in low- and moderate-income geographies.

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

### **Community Development Services**

The bank provided a limited level of community development services to the full-scope area. Services consisted of EBT transfers for public assistance payments and a training program that would allow Volunteer Income Tax Assistance (VITA) preparers to offer taxpayers the convenience of the ability to receive their tax refund via a debit card. Opportunities exist through a number of non-profit community development entities and CDFIs in the area.

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

Based on a limited-scope review, the bank's performance under the service test in the Tulsa AA is not inconsistent with the rating for the state. Performance in the limited-scope area did not materially impact the rating for the state of Oklahoma under the service test. Refer to Table 15 in the state of Oklahoma section of appendix D for the facts and data that support these conclusions.

## State of Oregon

<b>CRA Rating for the rating area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors that support this rating include:

- Good overall performance for the lending test results from good performance in several of the limited-scope areas, which offset otherwise excellent performance in the full-scope Salem MSA. Within the full-scope area, the distribution of loans within geographies of different income levels was adequate, the distribution of loans to borrowers of different income levels was good, and lending activity was excellent. The volume of CD lending in Salem had a significantly positive impact on lending in the MSA.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Excellent performance in the limited-scope areas had a significant, positive impact on otherwise good performance in the full-scope Salem MSA and resulted in the Outstanding service test rating.

### Description of Institution's Operations in the Rating Area

The bank has delineated 13 AAs within the state; six are in MSAs, and seven are in non-metropolitan areas. One of these areas is the Portland-Vancouver-Hillsboro, OR-WA MMSA, which is a separate rating area from the state. (Please see the Portland-Vancouver-Hillsboro, OR-WA MMSA rating area for a description of the bank's operations in that area.) Excluding the multistate area, 24.4% of the bank's deposits are concentrated in the Salem AA; therefore, it was selected for a full-scope review. The remaining AAs were analyzed using limited-scope procedures.

The state is a new rating area for the bank as a result of its purchase from the FDIC of certain assets of WaMu, which failed in 2008.

Excluding the multistate area, the bank operates over 50 branches and over 60 deposit taking ATMs in Oregon. For this state rating area, 53 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. Statewide, the bank ranks fourth of 40 FDIC-insured depository institutions, with a 6.8% market share. The bank's deposits of \$1.7 billion in the state represent 0.3% of its total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Oregon is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Salem AA is excellent. Performance in the limited-scope AAs had a negative impact on the lending test rating for the state of Oregon. The Salem AA represents only 24% of the deposits for Oregon. Three of the five limited-scope AAs (totaling 60% of the deposits for Oregon) demonstrated weaker performance than in the Salem AA.

### Lending Activity

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

Lending activity in the Salem MSA is excellent. With the fourth largest deposit market share, the bank ranks sixth, ninth, and fourth in market share for home purchase, home improvement, and home refinance loans among local deposit taking institutions and national mortgage lenders within the MSA, respectively. The bank's small business lending market share rank is twenty-fifth for local deposit taking institutions and national credit card lenders. National credit card lenders have 70% of the market share for small business lending in the AA.

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

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

The distribution of loans within geographies of different income levels is adequate. There is only one low-income census tract in this AA, so we generally placed more weight on performance in the moderate-income tracts. Performance for the HMDA related products was adequate. Home refinance lending was good while home purchase and home improvement lending were both adequate. Loans made to small businesses were adequate in the moderate-income geographies. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was good. Overall, HMDA related lending was good. Home purchase, home refinance, and home improvement performance were each considered good. Lending to businesses with different revenue sizes was excellent.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance in the Salem AA. Chase originated 16 loans totaling \$10.5 million during this evaluation period. The dollar volume represents 22.5% of Tier 1 Capital allocated to the Salem AA.

## **Product Innovation and Flexibility**

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

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

Based on limited-scope reviews, the bank's performance under the lending test in the Eugene, Medford, and non-metropolitan AA is not inconsistent with the bank's overall good performance under the lending test in state of Oregon. In the Bend and Corvallis AAs, the bank's performance is stronger than the bank's overall performance in the state and considered excellent. These AAs had good performance for borrower distribution compared to adequate performance in the other AAs. Performance in the three larger limited-scope AAs, which have 60% of the deposits in the state, had a negative impact on the overall rating for the state of Oregon. Refer to the Tables 1 through 12 in the state of Oregon section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Oregon is rated Outstanding. Based on a full-scope review, performance is excellent in the Salem MSA. Performance in the limited-scope AAs did not materially impact the investment test rating for the state.

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

Based on significant volume, investment test performance in the Salem AA is excellent. JPMCB funded four investments in the MSA totaling \$2.9 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on two prior period investments as of year-end 2010 was \$0.2 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest investment in the Salem MSA totaled \$2.2 million which consisted of an investment in a project designed to provide affordable rental housing through LIHTC. Other investments consisted primarily of investments in affordable housing and a contribution to a local organization that provides affordable housing.

The bank also made investments and grants to organizations and funds throughout the state of Oregon, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 20 investments for \$6.6 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made three investments with remaining balances totaling \$0.6 million in the broader statewide area with the potential to benefit the bank's AAs. These investments in the broader statewide area further support the bank's overall performance under the investment test for the state.

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

Performance in limited-scope AAs did not negatively impact the investment test rating for Oregon. Based on limited-scope reviews, the bank's performance under the investment test in the Bend, Corvallis, Eugene-Springfield and Medford MSAs is excellent and not inconsistent with the overall excellent performance in Oregon. Performance in the Oregon Non-MSA is adequate and weaker than the overall performance in Oregon. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Oregon section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Oregon is rated Outstanding. Excellent performance in the limited-scope areas had a significant, positive impact on otherwise good performance in the full-scope Salem MSA and resulted in the Outstanding service test rating. Based on a full-scope review, the bank's performance in the Salem AA is good, primarily due to good branch distribution. Excellent branch distribution in several limited-scope AAs, which represent 60% of the bank's deposits in the state, enhanced and elevated the bank's performance in the state. The bank provided an adequate level of community services after considering services provided in a broader statewide area with potential to impact this AA.

### **Retail Banking Services**

The bank's performance in the Salem AA is good; services are accessible to essentially all portions of the full-scope AA. All the branches were acquired from the FDIC as part of the WaMu transaction. The percentage of the bank's branches located in moderate-income geographies exceeds the percentage of the AA's population residing in the geography. There are no branches located in low-income geographies as a low percentage of the area's population resides in low-income census tracts. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network provides adequate access to deposit taking ATM's in low- and moderate-income geographies. Performance in the limited-scope AAs had a positive impact on the service test rating for Oregon.

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

### **Community Development Services**

Responsiveness to the community development service needs in the Salem, OR MSA is adequate. Identified needs for the MSA included affordable housing, homelessness programs and services, assistance for small business, and economic development and revitalization. The lack of a strong community development services infrastructure in the MSA limits the potential ability to meet the CD needs in low- to moderate-income areas. The bank's community development service included employees serving in board and committee roles in organizations that serve low- and moderate-income families and individuals by promoting affordable housing and financial literacy. This analysis included services provided in broader statewide areas with potential to benefit the Salem AA.

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

The performance in several of the limited-scope areas enhanced and elevated the overall service test rating for the state of Oregon. Based on limited-scope reviews, the bank's performance under the service test in the Bend, Corvallis, Medford, and the non-metropolitan AAs is excellent as a result of readily accessible branch distribution. These areas represent over 60% of the bank's deposits in the state. In the Eugene-Springfield AA, the bank's performance is adequate and weaker than the bank's overall performance in the state due to less accessible branch distribution. Refer to Table 15 in the state of Oregon section of appendix D for the facts and data that support these conclusions.



## State of Utah

<b>CRA Rating for the rating area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors that support this rating include:

- Good distribution of loans to borrowers of different income levels and within geographies of different income levels were the primary reason for the lending test rating.
- A significant volume of broader statewide and regional area investments elevated an otherwise adequate investment test performance to a good level.
- Excellent branch and ATM distribution support the Outstanding rating under the service test. Good branch service hours and an adequate level of community development services were also considered.

### Description of Institution's Operations in the Rating Area

The bank has delineated six AAs within the state, five of which are in MSAs with the remainder in a non-metropolitan area. Within Utah, 94.5% of the bank's deposits are concentrated in the Salt Lake City AA; therefore, it was selected for a full-scope review. The remaining AAs were analyzed using limited-scope procedures.

Chase operates 60 branches and nearly 80 deposit taking ATMs in Utah. For this state rating area, 32 of the branches are a result of bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. Statewide, the bank ranks tenth of 74 FDIC-insured depository institutions, with a 3.2% market share. The bank holds \$8.6 billion of deposits in the state, which represents 1.6% of the bank's total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

The banking market in the state is unique in that the top eight depository institutions in the state, which account for more than 73% of deposits, are atypical banks that gather deposits almost entirely via the internet or through broker-dealer arrangements as compared to more traditional branch offices. As a result, there is intense competition among the financial institutions with CRA responsibilities for community development activities in the Salt Lake City AA, which is a comparatively small market.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Utah is rated High Satisfactory. Based on full-scope reviews, the bank's performance in the Salt Lake City AA is good. Performance in the limited-scope AAs did not impact the lending test performance in the state.

## **Lending Activity**

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

Lending activity is excellent. The bank originated a high volume of home purchase, refinance, and small business loans in the Salt Lake City AA. The bank originated a good volume of home improvement loans in the full-scope area. There is strong competition for all home mortgage loans, but especially the home improvement product. The bank is ranked among the top five lenders for all home mortgage products when compared to lenders with deposit market shares in the AA. Competition for small business loans is strong, where the top five lenders, all credit card banks including the bank's affiliated credit card bank, have 77% of the market share. The bank is ranked fourth in small business loan market share among deposit taking financial institutions in the AA.

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

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

The distribution of loans within geographies of different income levels is good. Performance for the HMDA related products was good. Home purchase lending was excellent; home improvement lending was good and refinance lending was adequate. There was a very limited volume of owner-occupied housing in low-income census tracts, so we generally placed more weight on performance in the moderate-income tracts. We noted, however, that despite these limitations, the percentage of home purchase and improvement loans made in low-income census tracts greatly exceeded the percentage of owner-occupied housing units located in these tracts. Loans made to small businesses were excellent in both low- and moderate-income geographies. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers of different income levels was good. We considered the impact that the poverty level of 10.7% had on mortgage-related lending. Overall, HMDA related lending was good. Home purchase and refinance lending were good with home improvement lending adequate. Lending to businesses with different revenue sizes was poor.

## **Community Development Lending**

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

Community development lending had a neutral impact on lending performance in the Salt Lake City AA. The bank originated 13 community development loans totaling \$23.3 million during this evaluation period.

### **Product Innovation and Flexibility**

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

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

Based on limited-scope reviews, the bank's performance under the lending test in the St. George and non-metropolitan areas is not inconsistent with the bank's overall good performance under the lending test in the state of Utah. The bank's performance under the lending test in the Ogden-Clearfield AA is stronger than the bank's overall good performance. This AA had a significant volume of community development lending that helped elevate otherwise good performance to the excellent level. In the Logan and Provo-Orem AAs, the bank's performance is weaker than the bank's overall performance in the state, but is still adequate. These AAs had good and adequate distributions of loans to borrowers of different income levels, respectively, and poor performance within geographies of different income levels. Performance in the limited-scope AAs did not have an impact on the overall rating for the state of Utah. Refer to the Tables 1 through 12 in the state of Utah section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Utah is rated High Satisfactory. Based on a full-scope review, performance in the Salt Lake City MSA is adequate. Excellent performance in the limited-scope AAs did not materially impact the investment test rating for the state. However, the significant volume of investments in the broader statewide and regional areas with the potential to benefit the state elevated the bank's rating for the state to a good level.

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

Despite strong competition from other CRA investors, performance in the Salt Lake City MSA is adequate. JPMCB funded 230 investments in the MSA totaling \$18.0 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 25 prior period investments as of year-end 2010 was nearly \$5.0 million. The bank's responsiveness to the community development needs in the AA is adequate, with the majority of investments related to affordable housing and community services. The entire MSA is considered a "high-cost" housing area. The largest investment in the Salt Lake City MSA totaled \$4.6 million which consisted of a New Markets Tax Credit investment in a project designed to provide community services through the Salt Lake YWCA. Other investments consisted primarily of

investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and elevated the overall state rating. The bank made investments and grants to organizations and funds throughout the state of Utah and in a broader regional area around Utah, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 12 investments for \$4.8 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made three investments with remaining balances totaling \$57 thousand in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 24 investments for \$65.7 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made seven investments with remaining balances totaling \$0.5 million in the broader regional area with the potential to benefit the bank's AAs. The excellent volume of these broader statewide and regional area investments is considerably more than the volume of direct investments in the bank's AAs.

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

Performance in limited-scope AAs did not materially impact the investment test rating for Utah due to the relatively low percentage of the bank's deposits in the state in the limited-scope AAs. Based on limited-scope reviews, the bank's performance under the investment test in the Logan, Ogden-Clearfield, Provo-Orem, St. George, and the Utah Non-MSA AAs is excellent and stronger than the overall High Satisfactory performance in Utah. Stronger performance is due to a higher amount of qualified investments relative to the bank's operations in the AA. In reaching this conclusion, consideration was given to the significant volume of prior period investments remaining outstanding at the end of the evaluation period. Refer to the Table 14 in the state of Utah section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Utah is rated Outstanding. Based on a full-scope review, the bank's performance in the Salt Lake City AA is excellent. The bank provides an excellent level of retail services and an adequate level of community development services in the full-scope area. Performance in the limited-scope AAs did not materially impact the service test rating for Utah.

### **Retail Banking Services**

The distribution of branches in the Salt Lake City AA is excellent. The percentage of bank branches in low-income geographies significantly exceeds the population percentage in these geographies; however, the percentage of branches is below the population percentage in

moderate-income geographies. When nearby branches are considered, accessibility improves in the moderate-income geographies. Nearby branches are those located in middle- or upper-income geographies, which are within one-half mile from a low- or moderate-income geographies. The opening and closing of branches has generally not adversely affected the accessibility of the bank's delivery systems in the full-scope AA. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network offers an alternative delivery system to LMI geographies and individuals through full-service ATM's in the AA.

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

### **Community Development Services**

The bank's record of community development service in the Salt Lake City AA is adequate. This evaluation included services in broader statewide areas with the potential to benefit the state's AAs. Identified community development needs of the AA include foreclosure prevention, affordable housing, economic development, revitalization and stabilization and small business assistance. Utah is one of the top ten foreclosure states with a continued need for foreclosure prevention assistance however few CD services were directed at this need. The bank's participation in CD services included 5 annual board or committee memberships, financial education and homebuyer and mortgage literacy programs in the branches.

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

Based on limited-scope reviews, the bank's performance under the service test in the Ogden-Clearfield, and Provo-Orem AAs is excellent and not inconsistent with the state rating. The bank's performance in the Logan, St. George, and non-metropolitan AAs is weaker than the bank's overall performance in the state due to the lower number of branches in the low- and moderate-income geographies. Performance in the limited-scope areas did not materially impact the service test rating for the state. Refer to Table 15 in the state of Utah section of appendix D for the facts and data that support these conclusions.

## State of Washington

<b>CRA Rating for the rating area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>Outstanding</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors that support this rating include:

- Excellent volumes of community development loans elevated an overall good performance under the lending test to the excellent level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments.
- Excellent service test performance resulted from excellent branch and ATM distribution, as well as good service hours and an adequate record community development services.

### Description of Institution's Operations in the Rating Area

The bank has delineated 17 AAs within the state; 12 are in MSAs, and five are in non-metropolitan areas. One of these areas is the Portland-Vancouver-Hillsboro, OR-WA MMSA, which is a separate rating area from the state. (Please see the Portland-Vancouver-Hillsboro, OR-WA MMSA rating area for a description of the bank's operations in that area.) Excluding the multistate area, 68.1% of the bank's deposits are concentrated in the Seattle-Bellevue AA; therefore, it was selected for a full-scope review. The remaining AAs were analyzed using limited-scope procedures.

The state is a new rating area for the bank as a result of its purchase from the FDIC of certain assets of WaMu, which failed in 2008.

Excluding the multistate area, the bank operates 180 branches and over 240 deposit taking ATMs in Washington. For this state rating area, 175 of the branches are a result of the bank's purchase of certain assets and liabilities of the former WaMu from the FDIC. Statewide, the bank ranks fourth of 110 FDIC-insured depository institutions, with an 8.1% market share. The bank's deposits of \$8.5 billion in the state represent 1.6% of its total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Washington is rated Outstanding. Based on a full-scope review, the bank's performance in the Seattle-Bellevue-Everett MSA is excellent, which is based significantly upon excellent community development lending. Performance in the limited-scope AAs did not impact the lending test rating in the state.

## **Lending Activity**

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

Lending activity is excellent. The bank originated an excellent volume of home purchase, home improvement, and home refinance loans in the Seattle-Bellevue-Everett MSA. There are a large number of financial institutions, including large, nationally based mortgage companies, offering mortgage loans in the MSA. The bank is ranked sixth, fifth and third for home purchase, home improvement and home refinance market share, respectively. Chase ranks twenty-fourth for small business lending in the MSA. Credit card banks, including the bank's affiliate, are the top five small business lenders with almost 67% of the market share.

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

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

The distribution of loans within geographies of different income levels was good. The bank had good performance for HMDA, multi-family, and small business lending. For each of the HMDA categories, home purchase lending was good with adequate performance for both home improvement and home refinance lending. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different income levels was good. Good HMDA lending offset excellent small business lending. All three HMDA loan products demonstrated adequate performance to both low-income borrowers and excellent performance to moderate-income borrowers. We considered the impact that the poverty level of 10.5% had on mortgage-related lending.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance in the Seattle AA. Chase originated 80 loans totaling \$213.6 million during this evaluation period. The dollar volume represents 32.6% of Tier 1 Capital allocated to the Seattle AA. All of the loans addressed affordable housing needs. One example includes a \$13 million construction loan for 118 units of affordable housing and is part of Seattle Housing Authority's revitalization plan. All units are affordable to adults and families earning 60% or less of adjusted MFI.

## Product Innovation and Flexibility

Product innovation and flexibility had a neutral impact on performance in the full-scope area. The bank provided information on flexible loan programs in the full-scope AA, which indicated a limited volume of loan originations with flexible features.

## Conclusions for Areas Receiving Limited-Scope Reviews

Performance in the limited-scope AAs was not significant enough to impact the overall rating for the state of Washington. Based on limited-scope reviews, the bank's performance under the lending test in the Bellingham and non-metropolitan AAs is not inconsistent with the bank's overall excellent performance under the lending test in the state of Washington. In the Bremerton-Silverdale, Kennewick-Pasco-Richland, Longview, Mount Vernon-Anacortes, Olympia, Spokane, Tacoma, Wenatchee, and Yakima AAs, the bank's performance is weaker than the bank's overall performance in the state. Performance in the Wenatchee MSA is considered adequate, primarily because of adequate lending activity and distribution of loans with geographies of different income levels as well as neutral consideration for community development loans. The other AAs had good performance. Refer to the Tables 1 through 12 in the state of Washington section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in Washington is rated Outstanding. Based on a full-scope review, performance is excellent in the Seattle-Bellevue-Everett AA. Performance in the limited-scope AAs did not materially impact the investment test rating for the state.

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

Based on significant volume, investment test performance in the Seattle-Bellevue-Everett AA is excellent. JPMCB funded 200 investments in the MSA totaling \$98.5 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 80 prior period investments as of year-end 2010 was \$16.2 million. Additionally, approximately \$7.9 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing as the entire MMSA is considered a "high-cost" housing area. The largest investment in the Seattle-Bellevue-Everett MSA totaled \$10.3 million which consisted of an investment in a project designed to provide affordable rental housing through the Federal Low-Income Housing Tax Credit (LIHTC) program. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.



The bank also made investments and grants to organizations and funds throughout the state of Washington and in a broader regional area around Washington, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 19 investments for \$9.9 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made one investment with a remaining balance of \$0.1 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made one investment for \$0.3 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made nine investments with remaining balances totaling \$1.6 million in the broader regional area with the potential to benefit the bank's AAs. These investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test for the state.

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

Performance in the limited-scope AAs did not materially impact the investment test rating for the state of Washington. Based on limited-scope reviews, the bank's performance under the investment test in the Bellingham, Bremerton-Silverdale, Mount Vernon-Anacortes, Spokane, Tacoma, Yakima and the Washington Non-MSA AAs is excellent and not inconsistent with the overall Outstanding performance in Washington. Performance in the Wenatchee AA is poor and significantly weaker than the overall performance in Washington. Performance in the Kennewick-Pasco-Richland, Longview, and Olympia MSAs is very poor and significantly weaker than the overall performance in Washington. Weaker performance is centered in a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Washington section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Washington is rated Outstanding. Based on a full-scope review, the bank's performance in the Seattle-Bellevue-Everett AA is excellent. The bank provides an excellent level of retail services and an adequate level of community development services. Performance in the limited-scope AAs did not materially impact the service test rating for Washington.

### **Retail Banking Services**

The distribution of branches is excellent and services are readily accessible to all portions of the bank's AA. The percentage of branches located in low-and moderate-income geographies exceeds the percentage of the AA's population residing in the respective geographies. The majority of branches in this AA were obtained from the FDIC in the 2008 WaMu transaction, opening this market to the bank. The bank opened two new branches in the AA, one of which is in a moderate-income tract which demonstrates good performance. Branch hours do not

vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. Full-service ATM's in both low- and moderate-income geographies exceed the percentage of the AA's population residing in these geographies, which is excellent.

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

### **Community Development Services**

The bank's responsiveness to community development service needs in the Seattle-Bellevue-Everett AA is adequate. Community development needs include: affordable housing and rentals for low- to moderate-income families, small business assistance, financial literacy, and economic development in distressed neighborhoods and revitalization. Many potential community development opportunities are available in the area. The majority of the bank's service participation focused on financial literacy through mortgage days at branches in low- to moderate-income areas. Leadership efforts included seven board memberships or committee involvement, and technical assistance to non-profits and organizations.

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

Performance in the limited-scope areas did not materially impact the service test rating for the state. Based on limited-scope reviews, the bank's performance under the service test in the Olympia and Wenatchee-East Wenatchee AAs is not inconsistent with the bank's overall excellent performance under the service test in the state of Washington. In the Bellingham, Bremerton-Silverdale, Kennewick-Pasco-Richland, Longview, Mount Vernon-Anacortes, Spokane, Tacoma, Yakima, and the non-metropolitan AAs, the bank's performance is weaker than the bank's overall performance in the state primarily due to less accessible branch distribution. Refer to Table 15 in the state of Washington section of appendix D for the facts and data that support these conclusions.

## State of West Virginia

<b>CRA Rating for the Rating Area:</b>	<b><u>Satisfactory</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Low Satisfactory</u></b>

The major factors that support this rating include:

- Excellent volume of community development lending was the primary reason for elevating otherwise adequate lending test performance to the good level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments, including those located in the broader statewide and regional areas with the potential to benefit the bank's AAs.
- Adequate service test performance resulted from good branch distribution, hours of service, and alternate delivery systems in the full-scope AA that was negatively impacted by weaker performance in the limited-scope areas.

### Description of Institution's Operations in the Rating Area

Chase has delineated nine AAs within the state. One of these areas is within the Wheeling MMSA, which is a separate rating area from the state. (Please see the Wheeling MMSA rating area for a description of the bank's operations in that area.) Of the remaining AAs in the state, two are in MSAs and six are in non-metropolitan areas. For the state of West Virginia, the Charleston AA was selected for a full-scope review as this area contains 34.7% of the rating area's deposits. The remaining MSA and the combined non-metropolitan AAs were analyzed using limited-scope procedures.

Excluding the multistate area, the bank operates 28 branches and 28 deposit taking ATMs in West Virginia. Statewide, the bank ranks fifth of 85 FDIC-insured depository institutions, with a 5.8% market share. The bank's deposits of \$1.6 billion in the state represent 0.3% of its total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in West Virginia is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Charleston AA is good. Excellent community development lending and lending activity support this conclusion. Performance in the limited-scope AAs did not materially impact the lending test rating in the state.

### Lending Activity

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

Lending activity is excellent. Chase has the fifth largest deposit market share in the AA. Home purchase lending and home refinance lending market share are both higher than the bank's deposit rank. The bank has no market share for home improvement lending for 2009. There is strong competition for mortgage loans from other West Virginia based banks. Chase was ranked twentieth for small business lending market share. National credit card banks control 67% of the small business lending market share for this AA.

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

Refer to Tables 2 through 7 in the state of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's loan originations and purchases.

The distribution of loans within geographies of different income levels was poor. Excellent penetration of small business loans into both low- and moderate-income geographies was negatively impacted by poor overall HMDA performance. There were very limited opportunities for lending in low-income census tracts because of a very limited supply of owner-occupied housing. We gave slightly more weight to moderate-income census tract performance because of a larger volume of owner-occupied housing there. Even with these considerations, home purchase and home refinance lending was poor. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

Refer to Tables 8 through 12 in the state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's loan originations and purchases.

The distribution of loans to borrowers with different income levels was good. Home purchase lending performance was good and home refinance lending was adequate. For home purchase and refinance lending, we considered the impact that 13.5% poverty levels had on the ability of borrowers to qualify for mortgage loans. The distribution of loans to businesses with different revenue sizes was adequate.

### **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance in the Charleston AA. Chase originated 15 loans totaling \$22.1 million during this evaluation period. The dollar volume represents 35.8% of Tier 1 Capital allocated to the Charleston AA.

### **Product Innovation and Flexibility**

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

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the lending test in the Huntington-Ashland MSA is not inconsistent with the bank's overall good performance under the lending test in West Virginia. Performance in the non-metropolitan area is weaker than the performance in the state, but considered adequate. Geographic and borrower distribution performance was similar to the state, but the lack of community development lending prevented an increase in the rating. Refer to the Tables 1 through 12 in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test in West Virginia is rated Outstanding. Based on a full-scope review, performance is excellent in the Charleston MSA. Performance in the limited-scope AAs negatively impacted the investment test rating for the state. However, this impact was offset by the level of investments in broader statewide and regional areas with the potential to benefit the AAs in the state. These investments helped to elevate the overall rating for the state to an excellent level.

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

Based on significant volume, investment test performance in the Charleston AA is excellent. JPMCB funded 18 investments in the MSA totaling \$4.7 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on three prior period investments as of year-end 2010 was \$0.2 million. The bank's responsiveness to the community development needs in the AA is excellent, especially as it relates to affordable housing and community services. The largest two investments in the Charleston MSA totaled \$3.1 million which consisted of investments in projects designed to provide affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing community services. Additionally, the bank demonstrated leadership by providing a \$10.5 million LIHTC investment in a West Virginia multi-investor fund that originated nine affordable housing projects throughout West Virginia. Chase conducted a site visit to see the towns and properties, and meet the developers and property managers for each deal. Also, the bank demonstrated leadership in the Charleston, WV MSA through three annual memberships on Boards of Directors and/or committees of various community development organizations that focus on a variety of needs within the community.

Investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and helped to elevate the overall state rating. The bank made investments and grants to organizations and funds throughout the state of West Virginia and in a broader regional area around West Virginia, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's

AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 13 investments for \$3.2 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 12 investments with remaining balances totaling \$0.8 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank also made one investment for \$20.0 thousand in the broader regional area with the potential to benefit the bank's AAs.

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

Performance in one of the limited-scope AAs negatively impacted the investment test rating for West Virginia. However, this impact was offset by the bank's investments in broader statewide and regional area organizations. Based on limited-scope reviews, the bank's performance under the investment test in the Huntington-Ashland MSA is excellent and not inconsistent with the overall excellent performance in West Virginia. Performance in the West Virginia Non-MSA is adequate and weaker than the overall performance in West Virginia. Weaker performance is based on a lower amount of qualified investments relative to the bank's operations in the AA. The Non-MSA AAs represent over 46% of the bank's deposits in the state. Refer to the Table 14 in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance in the state of West Virginia is rated Low Satisfactory. A full-scope review of the Charleston AA indicates a good performance level, in which the bank provides a good level of retail services and an adequate level of community development services. Performance in the limited-scope AAs weakened the overall service test rating for West Virginia.

### **Retail Banking Services**

The bank's delivery systems in the Charleston AA provide a good level of accessibility. The distribution of branches within the full-scope area is good; branches are accessible to essentially all portions of the AA. The percentage of branches located in low-income geographies far exceeds the percentage of the AA's population residing in those geographies, but is significantly below the population in the moderate-income geographies. No branch offices were opened or closed during the evaluation period. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. The ATM network offers a good alternate delivery service channel to low- and moderate-income geographies and individuals.

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

## **Community Development Services**

The bank provided an adequate level of CD services to the full-scope area. These services included affordable housing initiatives, technical assistance to a Community Development Financial Institution (CDFI) with the potential to benefit the AA, as well as distributing public assistance payments for government agencies through EBT onto stored value cards.

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

Based on limited-scope reviews, service test performance in both the Huntington-Ashland and the non-metropolitan AAs is not inconsistent with the state rating. Performance in both limited-scope AAs is considered adequate due to less accessible branch distribution. These two AAs hold over 65% of the bank's total deposits in West Virginia. Performance in the limited-scope areas weakened the service test rating for the state of West Virginia. Refer to Table 15 in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

## State of Wisconsin

<b>CRA Rating for the Rating Area:</b>	<b><u>Outstanding</u></b>
<b>The lending test is rated:</b>	<b><u>High Satisfactory</u></b>
<b>The investment test is rated:</b>	<b><u>Outstanding</u></b>
<b>The service test is rated:</b>	<b><u>Outstanding</u></b>

The major factors that support this rating include:

- Excellent volume of community development lending was the primary reason for elevating otherwise adequate lending test performance to the good level.
- Excellent responsiveness to the investment needs of the rating area based on the volume of qualified investments, including those located in the broader statewide and regional areas with the potential to benefit the bank's AAs.
- Excellent service test performance resulted primarily from excellent branch and ATM distribution as well as good hours of service and a good record of community development services.

### Description of Institution's Operations in the Rating Area

Chase has delineated 15 AAs within the state. One of these areas is within the Chicago-Naperville-Joliet MMSA, which is a separate rating area from the state. (Please see the Chicago-Naperville-Joliet MMSA rating area for a description of the bank's operations in that area.) Of the remaining AAs in the state, eight are in MSAs and the rest are in non-metropolitan areas. Excluding the multistate area, 66.6% of the bank's deposits in the state are concentrated in the Milwaukee-Waukesha-West Allis MSA; therefore, it was selected for a full-scope review. The remaining AAs, including the combined non-metropolitan AAs, were analyzed using limited-scope procedures.

Excluding the multistate area, the bank operates over 70 branches and over 70 deposit taking ATMs in Wisconsin. Statewide, the bank ranks fourth of nearly 300 FDIC-insured depository institutions, with a 4.5% market share. The bank's deposits of \$5.6 billion in the state represent 1.1% of its total deposits. The bank's performance in this state had a minimal impact on its overall CRA rating.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test in Wisconsin is rated High Satisfactory. Based on a full-scope review, the bank's performance in the Milwaukee-Waukesha-West Allis, WI MSA is good, which is based significantly upon the excellent volume of community development lending. Performance in the limited-scope AAs did not materially impact the lending test rating in the state.



## **Lending Activity**

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

Lending activity is excellent. The bank originated an excellent volume of home purchase and home refinance loans in the Milwaukee-Waukesha-West Allis MSA. There are a large number of financial institutions, including large, nationally based mortgage companies, offering mortgage loans in the MSA. The bank's lending market shares in home improvement loans were somewhat below those of deposit taking financial institutions in the MSA. Chase ranks twentieth for small business lending in the MSA. Credit card banks, including the bank's affiliate, are the top five small business lenders with almost 66% of the market share.

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

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

The distribution of loans within geographies of different income levels was adequate. Both HMDA loan product performance and the distribution of loans to businesses were adequate. The home purchase and home improvement loan products demonstrated excellent performance to low-income borrowers, and good and adequate performance to moderate-income borrowers. Home refinance lending had poor performance in both the low- and moderate-income geographies. Overall small business lending was adequate but we noted poor performance in low-income tracts with adequate performance in moderate-income tracts. We did not identify any conspicuous or unexplained gaps in lending patterns.

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

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

The distribution of loans to borrowers with different income levels was adequate. HMDA loan product performance was adequate and the distribution of loans to businesses with different revenue sizes was poor. The bank had adequate performance to low-income borrowers for home purchase and home improvement lending that negatively impacted our conclusion of excellent performance to moderate-income borrowers. Home refinance lending performance was poor for low-income borrowers and adequate for moderate-income borrowers.

## **Community Development Lending**

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

Community development lending had a significant, positive impact on lending performance in the Milwaukee AA. Chase originated 24 loans totaling \$94.6 million during this evaluation period. The dollar volume represents 22.1% of Tier 1 Capital allocated to the Milwaukee AA.

A large majority of the dollar volume addressed affordable housing needs. One such example is an \$8.2 million construction and equity bridge loan for renovation of 150-unit senior rental apartment complex. These units will be covered under a 20-year Section 8 HAP contract.

### **Product Innovation and Flexibility**

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

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

Based on limited-scope reviews, the bank's performance under the lending test in the Appleton, Green Bay, Janesville, and Racine, AAs is not inconsistent with the bank's overall good performance under the lending test in the state of Wisconsin. Performance in the Fond du Lac, Madison, and non-metropolitan AAs was stronger than the bank's performance in the state. Fond du Lac has no low- or moderate-income geographies, so all weight was placed on the borrower distribution performance, which was good coupled with significantly positive community development lending. Madison and the non-metropolitan AAs had good performance in both geographic and borrower distribution along with significantly positive community development lending. In the Oshkosh-Neenah AA, the bank's performance is weaker than the bank's overall performance in the state and considered adequate. This AA did not benefit from positive community development lending performance. Performance in these AAs was not significant enough to affect the overall rating for the state of Wisconsin. Refer to the Tables 1 through 12 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

The bank's performance under the investment test in Wisconsin is rated Outstanding. Based on a full-scope review, performance is excellent in the Milwaukee-Waukesha-West Allis AA. Performance in some of the limited-scope assessments areas had a negative impact on the investment test rating for the state. However, investments in broader statewide and regional areas with the potential to benefit the AAs in the state offset the lower performance and positively impacted the bank's rating in the state.

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

Based on significant volume, investment test performance in the Milwaukee AA is excellent. JPMCB funded 136 investments in the MSA totaling \$18.7 million. In addition, we considered the ongoing impact that investments made prior to the current evaluation period had on the community development needs within the AA. The remaining balance on 34 prior period investments as of year-end 2010 was \$5.1 million. Additionally, approximately \$17.1 million in unfunded commitments for Low-Income Housing Tax Credits were evident at year-end 2010. These obligations demonstrate the bank's continued commitment to address the community development needs of the area. The bank's responsiveness to the community development

needs in the AA is good, with the majority of investments related to affordable housing. The largest investment in the Milwaukee-Waukesha-West Allis MSA totaled \$2.8 million which consisted of an investment in a project designed to provide 73 units of affordable housing through LIHTC. Other investments consisted primarily of investments in affordable housing and contributions to local and regional organizations providing affordable housing and community services.

Investments in the broader statewide and regional areas enhanced the bank's overall performance under the investment test and helped to elevate the overall state rating. The bank made investments and grants to organizations and funds throughout the state of Wisconsin and in a broader regional area around Wisconsin, but not located within the bank's AAs in the state. These investments and grants, while not located directly within the bank's AAs, have the potential to benefit the AAs. In the current evaluation period, the bank made 14 investments for \$0.9 million in the broader statewide area with the potential to benefit the bank's AAs. In the prior period, the bank made 23 investments with remaining balances totaling \$2.0 million in the broader statewide area with the potential to benefit the bank's AAs. The bank also made investments in the broader regional area with the potential to benefit its AAs. In the current evaluation period, the bank made 42 investments for \$22.8 million in the broader regional area with the potential to benefit the bank's AAs. In the prior period, the bank made 125 investments with remaining balances totaling \$22.8 million in the broader regional area with the potential to benefit the bank's AAs.

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

Performance in some of the limited-scope AAs negatively impacted the investment test rating for the state. However, this impact was offset by the bank's investments in broader statewide and regional area organizations. Based on limited-scope reviews, the bank's performance under the investment test in the Fond du Lac, Green Bay, Madison, and Oshkosh-Neenah MSAs is excellent and not inconsistent with the overall performance in Wisconsin. Performance in the Appleton and Racine MSAs and the Wisconsin Non-MSA is adequate and weaker than the overall performance in Wisconsin. Performance in the Janesville MSA is very poor and significantly weaker than the overall performance in Wisconsin. Weaker performance is based on in a lower amount of qualified investments relative to the bank's operations in the AA. Refer to the Table 14 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

## **SERVICE TEST**

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

The bank's performance under the service test in Wisconsin is rated Outstanding. Performance in the Milwaukee-Waukesha-West Allis AA is excellent. Performance in the limited-scope AAs did not materially impact the service test rating for the state of Wisconsin.

### **Retail Banking Services**

The distribution of branches in the full-scope area is excellent and readily accessible to all portions of the AA. The percentage of branches located in low-income geographies exceeds

the percentage of the population in that geography. The percentage of branches in moderate-income geography is below the percentage of the population there. When nearby branch locations are considered, accessibility significantly improved in both geographies. Branch hours do not vary in a way that inconveniences certain portions of the AA, particularly low- and moderate-income geographies. No branch offices were opened or closed during this review period. The ATM network offers good access to deposit taking ATM's in low- and moderate-income geographies. Traditional banking services are augmented by the bank's Rapid Cash Program. The percentage of accounts utilizing this service in low- and moderate-income geographies represents 78% of total users within this AA.

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

### **Community Development Services**

The bank provided a good level of community development services to the full-scope AA. Employees are involved in numerous leadership roles through 30 memberships on Boards or committees of 11 community development organizations that provide affordable housing, homeownership education and needed social services to low- and moderate-income families. Opportunities are plentiful in the Milwaukee MSA for banks to work with other organizations to meet community development service needs.

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

Based on limited-scope reviews, service test performance in Appleton, Fond du Lac, Green Bay, and Janesville AAs is not inconsistent with the bank's overall performance under the service test in Wisconsin. In the Madison, Oshkosh-Neenah, Racine, and the non-metropolitan AAs, the bank's performance is weaker than the bank's overall performance in the state due to less accessible branch distributions. Refer to Table 15 in the state of Wisconsin section of appendix D for the facts and data that support these conclusions.

## Appendix A: Scope of Examination

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

<b>Time Period Reviewed</b>	Lending, Investment and Service Tests: 01/01/2007 to 12/31/2010  Except where noted below, the time period reviewed for the evaluation for all products was from 01/01/2007 through 12/31/2010. The applicable time period reviewed was from 09/26/2008 through 12/31/2010 for the following rating areas: California, Georgia, Idaho, Nevada, Oregon, Washington, the Portland-Vancouver-Hillsboro, OR-WA multistate MSA, parts of Florida and of Utah. The reason for the different time periods is due to the fact that the bank acquired certain assets and liabilities of the former WaMu from the FDIC in September 2008. If the evaluation period is different than 01/01/2007 through 12/31/2010, it will be noted on the Tables.	
<b>Financial Institution</b>	<b>Products Reviewed</b>	
JPMorgan Chase Bank, N.A. (Chase) Columbus, OH	Home Mortgage Loans (HMDA), Small Business & Small Farm loans, Community Development loans, Investments, Services	

### Affiliates and Subsidiaries

Entity	Relationship	Products Reviewed
Accent Mortgage, LLC	Affiliate	Home Mortgage Loans
American Access Mortgage, LLC	Affiliate	Home Mortgage Loans
Bailey Mortgage, LLC	Affiliate	Home Mortgage Loans
Banc One Community Development Corporation	Bank Subsidiary	Community Development Investments
Banc One Neighborhood Development Corporation	Affiliate	Community Development Investments
Bucks County Lending Group LLC	Affiliate	Home Mortgage Loans
California Premiere Lending	Affiliate	Home Mortgage Loans
Cambridge Mortgage Services	Affiliate	Home Mortgage Loans
Chase Bank USA, N.A.	Affiliate	Home Mortgage Loans
Chase Community Development Corporation	Bank Subsidiary	Community Development Investments
Chase Manhattan Bank USA, N.A.	Affiliate	Home Mortgage Loans
Chase New Markets Corporation	Bank Subsidiary	Community Development Loans and Investments
Chesco Financial Services, LLC	Affiliate	Home Mortgage Loans
Community Life Mortgage, LLC	Affiliate	Home Mortgage Loans
Diamond Lending Services LLC	Affiliate	Home Mortgage Loans
Equibuild Mortgage, LLC	Affiliate	Home Mortgage Loans

<b>Entity</b>	<b>Relationship</b>	<b>Products Reviewed</b>
FA Out-of-State Holdings, Inc.	Bank Subsidiary	Community Development Investments
First Chicago Leasing Corporation	Affiliate	Community Development Investments
FNBC Leasing Corporation	Bank Subsidiary	Community Development Investments
GHML Holdings I, Inc.	Affiliate	Community Development Investments
GHML Holdings II, Inc.	Affiliate	Community Development Investments
GTC Fund III Holdings, Inc.	Affiliate	Community Development Investments
GTC Fund IV Holdings, Inc.	Affiliate	Community Development Investments
GTC Fund V Holdings, Inc.	Affiliate	Community Development Investments
ICIB Fund I Holdings, Inc.	Bank Subsidiary	Community Development Investments
JP Mortgage LLC	Affiliate	Home Mortgage Loans
JPE Home Finance LLC	Affiliate	Home Mortgage Loans
J.P. Morgan Chase Community Development Corporation	Affiliate	Community Development Loans and Investments
JPM Capital Corporation	Affiliate	Community Development Investments
JPMC Housing Partnership V LP	Affiliate	Community Development Investments
JPMorgan Chase & Co.	Affiliate	Community Development Investments
JPMorgan Chase Foundation	Affiliate	Community Development Grants
JPMorgan Housing Upper Tier Limited Partnership 2	Affiliate	Community Development Investments
JPMorgan Housing Upper Tier Limited Partnership 3	Affiliate	Community Development Investments
Lifestyle Mortgage, LLC	Affiliate	Home Mortgage Loans
Manhattan Home Finance, LLC	Affiliate	Home Mortgage Loans
NBD Community Development Corporation	Affiliate	Community Development Investments
NLTC Fund Holdings I, Inc.	Affiliate	Community Development Investments
Ocean Crest Lending LLC	Affiliate	Home Mortgage Loans
One Home Mortgage, LLC	Affiliate	Home Mortgage Loans
Plainfield Tower West, LLC	Bank Subsidiary	Community Development Investments
Primary Home Finance, LLC	Affiliate	Home Mortgage Loans
Prime One Mortgage, LLC	Affiliate	Home Mortgage Loans
Protech Tax Credit Fund II, LLC	Affiliate	Community Development Investments
Protech Tax Credit Fund III, LLC	Bank Subsidiary	Community Development Investments
Protech Tax Credit Fund, LP	Affiliate	Community Development Investments
Providian Bancorp Services	Bank Subsidiary	Community Development Investments
Residential Mortgage Group	Affiliate	Home Mortgage Loans

Entity	Relationship	Products Reviewed
SAHP 130 Holdings, Inc.	Affiliate	Community Development Investments
South Central Mortgage, LLC	Affiliate	Home Mortgage Loans
Total Financial Services, LLC	Affiliate	Home Mortgage Loans
Town And Country Mortgage, LLC	Affiliate	Home Mortgage Loans
Urban Home Mortgage, LLC	Affiliate	Home Mortgage Loans
Value Mortgage, LLC	Affiliate	Home Mortgage Loans
Washington Mutual Community Development, Inc.	Bank Subsidiary	Community Development Loans and Investments

List of Assessment Areas and Type of Examination			
Assessment Area	MSA# /MD#	Type of Examination	Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)
<b>Multistate MSAs / MDs</b>			
<i>Chicago-Joliet-Naperville, IL-IN-WI MSA</i>	16980		
Chicago-Joliet-Naperville, IL MD	16974	Full-scope	
Gary, IN MD	23844	Limited-scope	IN: Lake, Porter
Lake-Kenosha, IL-WI MD	29404	Limited-scope	
Cincinnati-Middletown, OH-KY-IN MSA	17140	Full-scope	OH: Butler, Clermont, Hamilton, Warren; KY: Boone, Campbell, Kenton
Louisville/Jefferson County, KY-IN MSA	31140	Full-scope	IN: Clark, Floyd, Harrison; KY: Jefferson, Oldham, Shelby
<i>New York-Northern New Jersey-Long Island, NY-NJ-PA MSA</i>	35620		
New York-Wayne-White Plains, NY-NJ MD	35644	Full-scope	
Edison-New Brunswick, NJ MD	20764	Limited-scope	
Nassau-Suffolk, NY MD	35004	Limited-scope	
Newark-Union, NJ MD	35084	Limited-scope	NJ: Essex, Hunterdon, Morris, Sussex, Union
Portland-Vancouver-Hillsboro, OR-WA MSA	38900	Full-scope	
Wheeling, WV-OH MSA	48540	Full-scope	OH: Belmont; WV: Marshall, Ohio
<b>Arizona</b>			
Phoenix-Mesa-Glendale, AZ MSA	38060	Full-scope	
Flagstaff, AZ MSA	22380	Limited-scope	
Lake Havasu City-Kingman, AZ MSA	29420	Limited-scope	
Prescott, AZ MSA	39140	Limited-scope	
Tucson, AZ MSA	46060	Limited-scope	
Yuma, AZ MSA	49740	Limited-scope	
Arizona Non-MSA		Limited-scope	Cochise, Gila, Graham, La Paz, Navajo, Santa Cruz
<b>California</b>			
Los Angeles-Long Beach-Glendale, CA MD	31084	Full-scope	

List of Assessment Areas and Type of Examination			
Assessment Area	MSA# /MD#	Type of Examination	Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)
Oakland-Fremont-Hayward, CA MD	36084	Full-scope	
San Diego-Carlsbad-San Marcos, CA MSA	41740	Full-scope	
Bakersfield-Delano, CA MSA	12540	Limited-scope	
Chico, CA MSA	17020	Limited-scope	
El Centro, CA MSA	20940	Limited-scope	
Fresno, CA MSA	23420	Limited-scope	
Hanford-Corcoran, CA MSA	25260	Limited-scope	
Madera-Chowchilla, CA MSA	31460	Limited-scope	
Merced, CA MSA	32900	Limited-scope	
Modesto, CA MSA	33700	Limited-scope	
Napa, CA MSA	34900	Limited-scope	
Oxnard-Thousand Oaks-Ventura, CA MSA	37100	Limited-scope	
Redding, CA MSA	39820	Limited-scope	
Riverside-San Bernardino-Ontario, CA MSA	40140	Limited-scope	
Sacramento-Arden-Arcade-Roseville, CA MSA	40900	Limited-scope	
Salinas, CA MSA	41500	Limited-scope	
San Francisco-San Mateo-Redwood City, CA MD	41884	Limited-scope	
San Jose-Sunnyvale-Santa Clara, CA MSA	41940	Limited-scope	
San Luis Obispo-Paso Robles, CA MSA	42020	Limited-scope	
Santa Ana-Anaheim-Irvine, CA MD	42044	Limited-scope	
Santa Barbara-Santa Maria-Goleta, CA MSA	42060	Limited-scope	
Santa Cruz-Watsonville, CA MSA	42100	Limited-scope	
Santa Rosa-Petaluma, CA MSA	42220	Limited-scope	
Stockton, CA MSA	44700	Limited-scope	
Vallejo-Fairfield, CA MSA	46700	Limited-scope	
Visalia-Porterville, CA MSA	47300	Limited-scope	
Yuba City, CA MSA	49700	Limited-scope	
California Non-MSA		Limited-scope	Del Norte, Humboldt, Inyo, Lake, Mendocino, Nevada, Siskiyou
<b>Colorado</b>			
Denver-Aurora-Broomfield, CO MSA	19740	Full-scope	
Boulder, CO MSA	14500	Limited-scope	
Colorado Springs, CO MSA	17820	Limited-scope	
Fort Collins-Loveland, CO MSA	22660	Limited-scope	
Greeley, CO MSA	24540	Limited-scope	
<b>Connecticut</b>			
Bridgeport-Stamford-Norwalk, CT MSA	14860	Full-scope	
New Haven-Milford, CT MSA	35300	Limited-scope	
<b>Florida</b>			



<b>List of Assessment Areas and Type of Examination</b>			
<b>Assessment Area</b>	<b>MSA# /MD#</b>	<b>Type of Examination</b>	<b>Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)</b>
Miami-Miami Beach-Kendall, FL MD	33124	Full-scope	
Cape Coral-Fort Myers, FL MSA	15980	Limited-scope	
Deltona-Daytona Beach-Ormond Beach, FL MSA	19660	Limited-scope	
Fort Lauderdale-Pompano Beach- Deerfield Beach, FL MD	22744	Limited-scope	
Jacksonville, FL MSA	27260	Limited-scope	
Lakeland-Winter Haven, FL MSA	29460	Limited-scope	
Naples-Marco Island, FL MSA	34940	Limited-scope	
North Port-Bradenton-Sarasota, FL MSA	35840	Limited-scope	
Orlando-Kissimmee-Sanford, FL MSA	36740	Limited-scope	
Palm Bay-Melbourne-Titusville, FL MSA	37340	Limited-scope	
Port St. Lucie, FL MSA	38940	Limited-scope	
Sebastian-Vero Beach, FL MSA	42680	Limited-scope	
Tampa-St. Petersburg-Clearwater, FL MSA	45300	Limited-scope	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	48424	Limited-scope	
<b>Georgia</b>			
Atlanta-Sandy Springs-Marietta, GA MSA	12060		
<b>Idaho</b>			
Boise City-Nampa, ID MSA	14260	Full-scope	
Coeur d'Alene, ID MSA	17660	Limited-scope	
Idaho Falls, ID MSA	26820	Limited-scope	
Pocatello, ID MSA	38540	Limited-scope	
Idaho Non-MSA		Limited-scope	Elmore, Latah, Twin Falls
<b>Illinois</b>			
Rockford, IL MSA	40420	Full-scope	
Bloomington-Normal, IL MSA	14060	Limited-scope	
Champaign-Urbana, IL MSA	16580	Limited-scope	
Davenport-Moline-Rock Island, IA-IL MSA	19340	Limited-scope	IL: Henry, Mercer, Rock Island
Peoria, IL MSA	37900	Limited-scope	
Springfield, IL MSA	44100	Limited-scope	
<b>Indiana</b>			
Indianapolis-Carmel, IN MSA	26900	Full-scope	Boone, Hamilton, Hancock, Hendricks, Johnson, Marion, Morgan, Shelby
Bloomington, IN MSA	14020	Limited-scope	Monroe
Elkhart-Goshen, IN MSA	21140	Limited-scope	
Fort Wayne, IN MSA	23060	Limited-scope	Allen, Whitley
Lafayette, IN MSA	29140	Limited-scope	Tippecanoe
Michigan City-La Porte, IN MSA	33140	Limited-scope	
Muncie, IN MSA	34620	Limited-scope	

List of Assessment Areas and Type of Examination			
Assessment Area	MSA# /MD#	Type of Examination	Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)
South Bend-Mishawaka, IN-MI MSA	43780	Limited-scope	IN: St. Joseph
Indiana Non-MSA		Limited-scope	Lawrence, Montgomery, Noble, Scott, Wayne
<b>Kentucky</b>			
Lexington-Fayette, KY MSA	30460	Full-scope	
Bowling Green, KY MSA	14540	Limited-scope	Warren
Elizabethtown, KY MSA	21060	Limited-scope	Hardin
Owensboro, KY MSA	36980	Limited-scope	Daviess
Kentucky Non-MSA		Limited-scope	Boyle, Madison
<b>Louisiana</b>			
New Orleans-Metairie-Kenner, LA MSA	35380	Full-scope	
Baton Rouge, LA MSA	12940	Full-scope	Ascension, East Baton Rouge, Livingston parishes
Alexandria, LA MSA	10780	Limited-scope	Rapides parish
Houma-Bayou Cane-Thibodaux, LA MSA	26380	Limited-scope	
Lafayette, LA MSA	29180	Limited-scope	Lafayette parish
Lake Charles, LA MSA	29340	Limited-scope	Calcasieu parish
Monroe, LA MSA	33740	Limited-scope	Ouachita parish
Shreveport-Bossier City, LA MSA	43340	Limited-scope	Bossier, Caddo parishes
Louisiana Non-MSA		Limited-scope	Beauregard, Iberia, Lincoln, St. Landry, Tangipahoa, Vermilion
<b>Michigan</b>			
Detroit-Livonia-Dearborn, MI MD	19804	Full-scope	
Ann Arbor, MI MSA	11460	Limited-scope	
Battle Creek, MI MSA	12980	Limited-scope	
Flint, MI MSA	22420	Limited-scope	
Grand Rapids-Wyoming, MI MSA	24340	Limited-scope	Ionia , Kent
Holland-Grand Haven, MI MSA	26100	Limited-scope	
Kalamazoo-Portage, MI MSA	28020	Limited-scope	Kalamazoo
Lansing-East Lansing, MI MSA	29620	Limited-scope	
Muskegon-Norton Shores, MI MSA	34740	Limited-scope	
Niles-Benton Harbor, MI MSA	35660	Limited-scope	
Saginaw-Saginaw Township North, MI MSA	40980	Limited-scope	
Warren-Troy-Farmington Hills, MI MD	47644	Limited-scope	
Michigan Non-MSA		Limited-scope	Charlevoix, Emmett, Grand Traverse, Kalkaska, Leelanau Montcalm, Roscommon, Sanilac, Shiawassee, Tuscola
<b>Nevada</b>			
Las Vegas-Paradise, NV MSA	29820	Full-scope	
<b>New Jersey</b>			
Trenton-Ewing, NJ MSA	45940	Full-scope	
Allentown-Bethlehem-Easton, PA-NJ MSA	10900	Limited-scope	NJ: Warren
<b>New York</b>			
Rochester, NY MSA	40380	Full-scope	Monroe, Ontario, Orleans, Wayne
New York Non-MSA		Full-scope	Sullivan
Albany-Schenectady-Troy, NY MSA	10580	Limited-scope	Albany, Rensselaer, Saratoga, Schenectady
Binghamton, NY MSA	13780	Limited-scope	

List of Assessment Areas and Type of Examination			
Assessment Area	MSA# /MD#	Type of Examination	Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)
Buffalo-Niagara Falls, NY MSA	15380	Limited-scope	Erie
Kingston, NY MSA	28740	Limited-scope	
Poughkeepsie-Newburgh-Middletown, NY MSA	39100	Limited-scope	
Syracuse, NY MSA	45060	Limited-scope	
Rochester, NY MSA	40380	Full-scope	Monroe, Ontario, Orleans, Wayne
<b>Ohio</b>			
Columbus, OH MSA	18140	Full-scope	
Akron, OH MSA	10420	Limited-scope	
Canton-Massillon, OH MSA	15940	Limited-scope	
Cleveland-Elyria-Mentor, OH MSA	17460	Limited-scope	
Dayton, OH MSA	19380	Limited-scope	
Lima, OH MSA	30620	Limited-scope	
Mansfield, OH MSA	31900	Limited-scope	
Parkersburg-Marietta-Vienna, OH-WV MSA	37620	Limited-scope	OH: Washington
Springfield, OH MSA	44220	Limited-scope	
Steubenville-Weirton, OH-WV MSA	44600	Limited-scope	OH: Jefferson
Youngstown-Warren-Boardman, OH-PA MSA	49660	Limited-scope	OH: Mahoning, Trumbull
Ohio Non-MSA		Limited-scope	Ashland, Athens, Auglaize, Columbiana, Coshocton, Darke, Hancock, Marion, Mercer, Muskingum, Shelby, Tuscarawas, Wayne, Wyandot
<b>Oklahoma</b>			
Oklahoma City, OK MSA	36420	Full-scope	Canadian, Cleveland, Oklahoma
Tulsa, OK MSA	46140	Limited-scope	Tulsa
<b>Oregon</b>			
Salem, OR MSA	41420	Full-scope	
Bend, OR MSA	13460	Limited-scope	
Corvallis, OR MSA	18700	Limited-scope	
Eugene-Springfield, OR MSA	21660	Limited-scope	
Medford, OR MSA	32780	Limited-scope	
Oregon Non-MSA		Limited-scope	Coos, Crook, Curry, Douglas, Josephine, Klamath, Lincoln, Linn, Malheur
<b>Texas</b>			
Houston-Sugar Land-Baytown, TX MSA	26420	Full-scope	
Abilene, TX MSA	10180	Limited-scope	Taylor
Amarillo, TX MSA	11100	Limited-scope	Potter, Randall
Austin-Round Rock-San Marcos, TX MSA	12420	Limited-scope	
Beaumont-Port Arthur, TX MSA	13140	Limited-scope	Jefferson, Orange
Brownsville-Harlingen, TX MSA	15180	Limited-scope	
College Station-Bryan, TX MSA	17780	Limited-scope	Brazos
Dallas-Plano-Irving, TX MD	19124	Limited-scope	
El Paso, TX MSA	21340	Limited-scope	
Fort Worth-Arlington, TX MD	23104	Limited-scope	

List of Assessment Areas and Type of Examination			
Assessment Area	MSA# /MD#	Type of Examination	Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)
Killeen-Temple-Fort Hood, TX MSA	28660	Limited-scope	Bell
Laredo, TX MSA	29700	Limited-scope	
Longview, TX MSA	30980	Limited-scope	Gregg
McAllen-Edinburg-Mission, TX MSA	32580	Limited-scope	
Midland, TX MSA	33260	Limited-scope	
Odessa, TX MSA	36220	Limited-scope	
San Antonio-New Braunfels, TX MSA	41700	Limited-scope	
Sherman-Denison, TX MSA	43300	Limited-scope	
Tyler, TX MSA	46340	Limited-scope	
Waco, TX MSA	47380	Limited-scope	
Wichita Falls, TX MSA	48660	Limited-scope	Wichita
Texas Non-MSA		Limited-scope	Gillespie, Harrison, Hockley, Hood, Navarro, Washington
<b>Utah</b>			
Salt Lake City, UT MSA	41620	Full-scope	
Logan, UT-ID MSA	30860	Limited-scope	UT: Cache
Ogden-Clearfield, UT MSA	36260	Limited-scope	
Provo-Orem, UT MSA	39340	Limited-scope	
St. George, UT MSA	41100	Limited-scope	
Utah Non-MSA		Limited-scope	Box Elder
<b>Washington</b>			
Seattle-Bellevue-Everett, WA MD	42644	Full-scope	
Bellingham, WA MSA	13380	Limited-scope	
Bremerton-Silverdale, WA MSA	14740	Limited-scope	
Kennewick-Pasco-Richland, WA MSA	28420	Limited-scope	
Longview, WA MSA	31020	Limited-scope	
Mount Vernon-Anacortes, WA MSA	34580	Limited-scope	
Olympia, WA MSA	36500	Limited-scope	
Spokane, WA MSA	44060	Limited-scope	
Tacoma, WA MD	45104	Limited-scope	
Wenatchee-East Wenatchee, WA MSA	48300	Limited-scope	
Yakima, WA MSA	49420	Limited-scope	
Washington Non-MSA		Limited-scope	Clallam, Grant, Grays Harbor, Island, Jefferson, Kittitas, Lewis, Mason, Okanogan, Stevens, Walla Walla, Whitman
<b>West Virginia</b>			
Charleston, WV MSA	16620	Full-scope	
Huntington-Ashland, WV-KY-OH MSA	26580	Limited-scope	WV: Cabell, Wayne
West Virginia Non-MSA		Limited-scope	Fayette, Harrison, Logan, Raleigh, Upshur
<b>Wisconsin</b>			
Milwaukee-Waukesha-West Allis, WI MSA	33340	Full-scope	
Appleton, WI MSA	11540	Limited-scope	
Fond du Lac, WI MSA	22540	Limited-scope	
Green Bay, WI MSA	24580	Limited-scope	Brown
Janesville, WI MSA	27500	Limited-scope	
Madison, WI MSA	31540	Limited-scope	Dane
Oshkosh-Neenah, WI MSA	36780	Limited-scope	

<b>List of Assessment Areas and Type of Examination</b>			
<b>Assessment Area</b>	<b>MSA# /MD#</b>	<b>Type of Examination</b>	<b>Other Information (Counties in aggregated AAs and/or counties assessed in MSAs or MDs where whole MSAs or MDs were not selected)</b>
Racine, WI MSA	39540	Limited-scope	
Wisconsin Non-MSA		Limited-scope	Dodge, Jefferson, Langlade, Portage, Walworth, Waupaca

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS JPMorgan Chase Bank, N.A.				
Overall Bank / Rating Area	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/ Multistate Rating
JPMorgan Chase Bank, N.A.	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Multistate Metropolitan Statistical Area or State:				
Chicago-Joliet-Naperville, IL-IN-WI MSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Cincinnati-Middletown, OH-KY-IN MSA	Outstanding	Outstanding	Low Satisfactory	Outstanding
Louisville/Jefferson County, KY-IN MSA	Outstanding	Outstanding	Outstanding	Outstanding
New York-Northern New Jersey-Long Island, NY-NJ-PA MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Portland-Vancouver-Hillsboro, OR-WA MSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Wheeling, WV-OH MSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Arizona	Outstanding	Outstanding	High Satisfactory	Outstanding
California	Outstanding	Outstanding	High Satisfactory	Outstanding
Colorado	Outstanding	Outstanding	High Satisfactory	Outstanding
Connecticut	Outstanding	Outstanding	Low Satisfactory	Outstanding
Florida	Outstanding	Outstanding	High Satisfactory	Outstanding
Georgia	Outstanding	Outstanding	Outstanding	Outstanding
Idaho	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Illinois	High Satisfactory	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kentucky	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Louisiana	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Michigan	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Nevada	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

RATINGS		JPMorgan Chase Bank, N.A.		
Overall Bank / Rating Area	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
New Jersey	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
Ohio	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oklahoma	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Oregon	High Satisfactory	Outstanding	Outstanding	Outstanding
Texas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Utah	High Satisfactory	High Satisfactory	Outstanding	Satisfactory
Washington	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Wisconsin	High Satisfactory	Outstanding	Outstanding	Outstanding

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

## Appendix C: Market Profiles for the Primary Rating Areas

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

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#### **New York-Northern New Jersey-Long Island, NY-NJ-PA Multistate MSA**

#### **New York-White Plains-Wayne, NY-NJ Metropolitan Division**

The New York-White Plains-Wayne, NY-NJ MD is the largest of the four MDs, which comprise the New York-Northern New Jersey-Long Island, NY-NJ-PA multistate MSA. The bank's AA consists of all 11 counties in the New York-White Plains-Wayne MD. This includes the New Jersey counties of Bergen, Hudson, and Passaic, and the New York counties of Bronx, Kings, New York, Putnam, Queens, Richmond, Rockland, and Westchester. According to 2000 census data, the AA contains 2,921 census tracts of which 11.6% are low-income, 24.6% are moderate-income, 28.5% are middle-income, and 33.1% are upper-income. Additionally, 2.2% of the census tracts in the AA do not have income information and are categorized as NA. The 2010 HUD estimated median family income for the MD is \$65,600 and nearly 17% of the population falls below the poverty level.

The bank has over \$270 billion in deposits in this AA, which represents over one-third of the bank's total deposits. There are over 170 FDIC-insured financial institutions in the MD with over 3,000 offices. Chase has over 600 branches and over 1,800 deposit taking ATMs in the MD. Main deposit competitors include Bank of America N.A., Citibank N.A., and HSBC Bank USA, N.A. Given the large number of banks, competition for all types of credit and deposit products is strong.

New York City dominates the population in the MD with over 8 million people. The city has the third lowest homeownership rate among large US cities at 33.0%, and 21.2% of households are below the poverty level. The New York City school system is the largest in the U.S. with 73.0% of the students eligible for free lunch. The cost of living in New York City has risen dramatically over the last ten years, with median owner-occupied housing prices increasing from approximately \$300 thousand in 2002 to over \$500 thousand in 2006 and to over \$820 thousand in 2010. Homeownership is at 40.4% which is significantly less than the New York state average of 53.0% and the national average of 66.2%. The increasing cost of living has resulted in a housing affordability issue with only 4.5% of owner-occupied housing affordable to low- and moderate-income individuals. The shortage of affordable housing in the MD combined with competitive factors significantly impact mortgage lending to low- and moderate-income borrowers and in low- and moderate-income communities.

New York City is home to a diversified mix of businesses, with many national and international corporations headquartered or with significant operations in the area. Historically, the downtown area has been dominated by the financial services industry. Industries operating in the midtown area include advertising, publishing, and garment production. The retail sector is a major employer along with health and social care. In addition, light manufacturing and wholesale trades provide a significant level of job opportunities in the Bronx.

The New York City economy has recovered from the weakened economic conditions from the recession in 2008-2009. In addition, the volatility on Wall Street impacted both the local and



national economies. Hiring in the financial sector has come to a standstill as firms continue to recover from the recession and come to terms with new rules put forth as a result of the financial regulatory reform law.

Along with the securities industry, leisure/hospitality and retail trade are driving growth in the area. The unemployment rate remains elevated as compared to before the recession. As of December 2010, the unemployment rate for the entire MSA of 8.1% approximated the New York State rate of 8.2%. This rate was below the national rate of 9.4%.

There are a numerous community-based organizations and community development opportunities in the MD. The primary purpose of these organizations varies greatly, but includes affordable housing, financial literacy, and creation and retention of small businesses. Through our community contact program, we had an opportunity to meet with representatives from several community-based organizations operating in the MD. These representatives indicated the following significant identified credit needs:

- Affordable housing and the preservation of affordable housing stock,
- Mortgage foreclosure prevention,
- Loans and lines of credit for small businesses, and
- Financial assistance to non-profit organizations, as government funding for these organizations is being reduced.

## Chicago-Joliet–Naperville, IL-IN-WI Multistate Metropolitan Statistical Area

### Chicago-Joliet-Naperville, IL Metropolitan Division

The bank's AA consists of Cook, DeKalb, DuPage, Grundy, Kane, Kendall, McHenry, and Will counties in the Chicago-Naperville-Joliet MD. The Chicago MD is the largest of the three MDs, which make up the Chicago-Naperville-Joliet, IL-IN-WI multistate MSA. According to 2000 census data, the AA contains 1,724 census tracts of which 13.6% are low-income, 24.8% are moderate-income, 35.7% are middle-income, and 24.9% are upper-income. Additionally, 1.0% of the census tracts in the AA does not have income information and are categorized as NA. The 2010 HUD estimated median family income for the MD is \$74,700, and 13% of the population falls below the poverty level.

The bank has \$45 billion in deposits in this AA, which represents 91.6% of the bank's deposits in the overall Chicago MSA. There are 236 FDIC-insured financial institutions in the MD with over 2,600 offices. Chase has over 350 branches and over 960 deposit taking ATMs in the MD. Main deposit competitors include Bank of America, N.A. and BMO Harris Bank, N.A. Given the large number of banks in the MD, competition for all types of credit and deposit products is strong.

The city of Chicago dominates the AA. We note that only 60.3% of the housing units in the Chicago MD are owner-occupied. The AA shares the same challenges as other urban areas. Housing costs remain high with nearly 700,000 households paying more than 30% of their income on housing. Housing stock is old with much of the housing being nearly forty years of age.

The Chicago area continues to be a business, transportation, and distribution center for the Midwest and a popular convention venue. Business, financial and professional services, transportation and distribution services, and tourism are the main drivers of the economy. This is evidenced in the top five employment sectors in the area: government, education and health services, professional and business services, manufacturing, and retail trade. While the AA economy continues to improve from the recession, high exposure to the manufacturing and distribution industries, an aging infrastructure, and competition with other cities for tourism and convention dollars may restrain growth. As of December 2010, the unemployment rate in the MD was 9.3%, which was near the national average.

There are numerous community development opportunities with many community-based organizations in the AA. The primary purpose of these organizations varies greatly, but includes affordable housing, financial literacy, and creation and retention of small businesses. Through our community contact program, we had an opportunity to meet with representatives from several community-based organizations operating in the AA. These representatives indicated the following significant identified credit needs:

- Mortgage foreclosure prevention.
- Conventional home purchase mortgages in low- and moderate-income areas.
- Small business lines of credit.

## State of California

### Los Angeles-Long Beach- Glendale, CA Metropolitan Division

The Los Angeles-Long Beach-Glendale MD (Los Angeles MD) is comprised of 1 county, specifically, Los Angeles County. It is one of two MDs that comprise the Los Angeles-Long Beach-Santa Ana, CA MSA. According to 2000 census data, the AA contains 2,054 census tracts of which 8.7% are low-income, 28.3% are moderate-income, 28% are middle-income, and 34.2% are upper-income. Additionally, 0.8% of the census tracts in the AA does not have income information and are categorized as Not Applicable (NA).

As of June 30, 2010, the bank ranked fourth with \$20.6 billion in deposits in this geographic area with a market share of 8.43%. Competition among the financial institutions in the AA is intense with 153 FDIC-insured depository institutions operating 2,423 branches within the MD, with the five largest banks holding 59.27% of the MD's deposits. JPMCB N.A. has 205 branches and 663 ATMs in the MD. Main deposit competitors include Bank of America N.A., Wells Fargo Bank N.A. and Union Bank, N.A.

The Los Angeles MD is a complex, diverse urban area that includes 88 cities and a number of unincorporated areas. Los Angeles is the largest city in California and the second largest city in the United States, behind only New York City. There are 9.9 million people within the MD, nearly 4 million of which reside within the City of Los Angeles. The HUD estimated 2010 median family income for the MD is \$63,000. Per the updated data from the US Census Bureau, over 16% of the population falls below the poverty level. Within the City of Los Angeles, poverty levels are higher at near 20%, within certain neighborhoods of the city poverty rates reach as high as 60%.

Defense and aerospace manufacturing continue to be important sources of employment in the area. Defense contractors have announced the elimination of nearly 1,500 jobs due to a tightening Pentagon budget. However, public infrastructure projects are on the rise with several projects planned within the next decade. The federal government has diverted \$620 million in funds from other states for much needed infrastructure projects in the state. Some of the largest employers in the area include the University of California; Kaiser Permanente; Northrop Grumman; and Boeing. As of December 2010, the Los Angeles MD had an unemployment rate of 12.5%, well above the national average rates of 9.8%.

The 2010 updated median housing value in the Los Angeles MD is approximately \$288,600. Home prices have declined nearly 50% from their 2006 peak of \$534,800. While home median home values have declined, affordability remains a significant issue. Housing prices remain at levels that make home ownership unattainable for low- and moderate-income individuals. Based upon the HUD estimated 2010 median income for the MD, the maximum income for a moderate-income individual is \$50,400.

Community development service and lending opportunities are plentiful in the area. Contacts with community-based organizations indicated there are significant credit and community development needs in the MD. The needs include the following:

- Affordable housing,
- Financial literacy programs,

- Increased access to financial services via increased branch presence in low- and moderate-income areas, and
- Small business lending.

### **Oakland-Fremont-Hayward, CA Metropolitan Division**

The Oakland-Fremont-Hayward MD (Oakland MD) is comprised of Alameda and Contra Costa Counties. The MD is part of the San Francisco-Oakland-Fremont, CA MSA. According to 2000 census data, the AA contains 489 census tracts of which 10.6% are low-income, 21.1% are moderate-income, 39.1% are middle-income, and 29% are upper-income. Additionally, 0.2% of the census tracts in the AA does not have income information and are categorized as NA.

As of June 30, 2010, Chase had \$4.8 billion in deposits in this geographic area with a market share of 8.52%, ranked third. There are 51 FDIC-insured depository institutions operating 520 branches within the MSA. Deposits are highly concentrated, with the top two banks holding over 50% of the MSA's deposits. JPMCB N.A. has 57 branches and 140 ATMs in the MSA. Main deposit competitors include Wells Fargo Bank N.A. and Bank of America N.A.

There are approximately 2.5 million people within the Oakland MSA. The HUD estimated 2010 median family income for the MSA is \$90,300. Over ten percent of the population within the AA is living below the poverty level. However; many cities within the area are experiencing much higher poverty levels such as the City of Oakland at 17.2% and the City of Richmond at 19.2%.

Oakland is the largest city in the AA and is known for its port and related transport industry. In addition to transport, government and medical services comprise the primary industries. The major employers in the area include the University of California, Kaiser Permanente, Safeway, and Chevron. As of December 2010, the Oakland MSA had an unemployment rate of 11.5%, almost tripling the 2006 unemployment rate of 4.4%.

The 2010 updated median housing value in the Oakland MSA is approximately \$435,300. Even after the collapse of the real estate market, home prices remain one of the highest in the country. While home median home values have declined, affordability remains a significant issue. Housing prices remain at levels that make home ownership unattainable for low- and moderate-income individuals. Based upon the HUD estimated 2010 median income for the MSA, the maximum income for a moderate-income individual is \$72,240.

Several community development service and lending opportunities are available in the area. Contacts with community-based organizations indicated there are credit and community development needs in the MSA that include affordable housing, financial literacy programs and increased access to financial services.

**San Diego-Carlsbad-San Marcos, CA MSA**

The San Diego-Carlsbad-San Marcos MSA (San Diego MSA) is comprised of 1 county, specifically, San Diego County. According to 2000 census data, the AA contains 605 census tracts of which 7.9% are low-income, 22.5% are moderate-income, 37.7% are middle-income, and 31.4% are upper-income. Additionally, 0.5% of the census tracts in the AA does not have income information and are categorized as NA.

As of June 30, 2010, Chase had \$6 billion in deposits in this geographic area with a market share of 11.36%, ranked fourth. Competition among the financial institutions in the AA is moderate with 58 FDIC-insured depository institutions operating 615 branches within the MSA. Deposits are highly concentrated, with the five largest banks holding over 72% of the MSA's deposits. JPMCB N.A. has 81 branches and 223 ATMs in the MSA. Main deposit competitors include Wells Fargo Bank N.A., Bank of America N.A. and Union Bank, N.A.

San Diego is the second largest city in California and the eighth largest city in the United States. There are slightly over 3 million people within the MSA. The HUD estimated 2010 median family income for the MSA is \$75,500. Per the updated data from the US Census Bureau, over 13% of the population falls below the poverty level.

The defense and tourism industries are the drivers in the San Diego economy. While recent job growth has been flat, improvement is anticipated for the near term. The US Navy is transferring its Fleet Weather Center from Honolulu and increasing the number of ships to be stationed in San Diego by over 20%. Lockheed Martin is also transferring jobs into the area from Minneapolis. Additionally, the Port of San Diego has completed the construction of a new \$28 million cruise ship terminal to accommodate additional tourism. As of December 2010, the San Diego MSA had an unemployment rate of 10.6%, increasing steadily since the 2006 unemployment rate of 4% but still 2 percentage points below the California rate.

The 2010 updated median housing value in the San Diego MSA is approximately \$383,100. San Diego was one of the first areas hit by the collapse of the real estate market. Home prices are down 36% from their 2005 peak. While home median home values have declined, affordability remains a significant issue as with much of California. Housing prices remain at levels that make home ownership unattainable for low- and moderate-income individuals. Based upon the HUD estimated 2010 median income for the MSA, the maximum income for a moderate-income individual is \$60,400.

Community development service and lending opportunities are available in the area. Contacts with community-based organizations indicated there are credit and community development needs in the MSA, especially financial literacy and foreclosure prevention programs; increased access to financial services; affordable housing; and financial support for community development groups.

## State of Michigan

### Detroit-Livonia-Dearborn, MI Metropolitan Division

The Detroit-Livonia-Dearborn, MD (Detroit MD) consists of Wayne County, Michigan. It is one of two MDs, which comprise the Detroit-Warren-Livonia MSA. According to 2000 census data, the AA contains 620 census tracts of which 11.5% are low-income, 30.6% are moderate-income, 30.8% are middle-income, and 25.8% are upper-income. Additionally, 1.3% of the census tracts in the AA does not have income information and are categorized as NA. The HUD estimated 2010 median family income for the AA (AA) is \$55,900. According to the US Census Bureau, over 22% of households within the AA fall below the poverty level, which considerably more than the United States average of 14%.

As of June 30, 2010, JPMCB N.A. had approximately \$16.7 billion in deposits in this geographic area with a second place market share of 19.42%. Competition among the financial institutions in the AA is relatively high with 52 FDIC-insured depository institutions operating 1,157 branches within the MSA. The market is concentrated with the top five ranked institutions holding 72.6% of the MSA's deposits. JPMCB N.A. has 174 branches and 115 ATMs in the MSA. Main deposit competitors include Comerica Bank and Bank of America N.A.

There are slightly over 2 million people within the AA. The population is on the decline, with a net out-migration of over 300,000 in the past decade. As of October 2010, the Detroit MD had an unemployment rate of 15.5%, one of the highest rates in the United States, however; the labor force appears to be stabilizing. The decline of the nation's motor vehicle-related industries led the downturn of the Detroit economy, however; the regional motor vehicle industry is now undergoing a slow recovery. Ford and GM each rehired a little in excess of 1,000 workers and GM is also receiving a grant to rehire 4,000 workers at its headquarters. With the uptick in the motor vehicle industry, suppliers and vendors have also begun to expand. However; the foreseen growth in the motor vehicle industry will not likely be sufficient to absorb the nearly 100 thousand workers who lost their jobs and continue to look for employment. The MD will need to diversify its economy by luring investments from industries such as those involved in alternative and green energy.

The 2011 updated median housing value in the Detroit MD is approximately \$83,500. Home prices have declined. The AA was one of the hardest hit areas during the recent economic downturn.

Contacts with community-based organizations indicated there are significant credit and community development needs in the AA. Opportunities exist for institutions to meet the need for increased flexible and low-cost lending for the purchase and rehabilitation of affordable housing as well as financial and home-buyer education and technical assistance.

## State of Texas

### Houston-Sugarland-Baytown, TX Metropolitan Statistical Area

The Houston-Baytown-Sugar Land MSA is comprised of 10 counties, specifically: Austin, Brazoria, Chamber, Fort Bend, Galveston, Harris, Liberty, Montgomery, San Jacinto, and Waller Counties. According to 2000 census data, the AA contains 895 census tracts of which 7.9% are low-income, 31.4% are moderate-income, 30.6% are middle-income, and 28.9% are upper-income. Additionally, 1.2% of the census tracts in the AA does not have income information and are categorized as NA. The HUD estimated 2010 median family income for the MSA is \$65,100. Per 2010 data from the U.S. Census Bureau, over 15% of the population falls below the poverty level.

As of June 30, 2010, JPMCB N.A. had over \$41 billion in deposits in this geographic area with a first place market share of 30.01%. Competition among the financial institutions in the AA is intense with 116 FDIC-insured depository institutions operating 1,562 branches within the MSA, but the market is fairly concentrated with the five largest banks holding 65.7% of the MSA's deposits. JPMCB N.A. has 216 branches and 365 ATMs in the MSA. Main deposit competitors include Wells Fargo Bank N.A. and Bank of America N.A.

Houston is the largest city in Texas and the fourth largest city in the United States. Houston was the fastest growing city in the United States in the 20th century, according to *American City Business Journals*. There are 4.7 million people within the MSA and 2 million of them reside within the City of Houston.

Houston continues to be a global leader in oil and gas technology with four of the top 15 employers engaged in the energy industry. Houston has a diversified business base; however, with the Port of Houston, the second busiest port in the United States in terms of annual tonnage and one of the largest in the world; a large health and medical services industry with the world's largest concentration of medical professionals; and education is also a large segment of Houston's economy, home to 14 major institutions of higher education. In addition, a portion of the Houston economy is dependent on a large aerospace industry. While the NASA Reauthorization bill, recently signed by President Obama, effectively extends the life of the space station through 2020, the general outlook for the local aerospace industry has worsened. The significant contraction in local aerospace will mean the loss of high-paying scientific and engineering jobs over the next couple of years. As of September 30, 2010, the Houston MSA had an unemployment rate of 8.3%, below the national average rate of 9.8%.

The 2011 updated median housing value in the Houston MSA is approximately \$148,500. Home prices have declined, however, less so than the national average, down six percent from September 2009 value of \$157,400.

Community development service opportunities, especially financial and home-buyer education and technical assistance are available to institutions in the area. Contacts with community-based organizations indicated there are significant credit and community development needs in the MSA. The needs include the following:

- Home buyer education.
- Credit and foreclosure counseling.

- Technical assistance to small business owners; and
- Small business lending.



## Appendix D: Tables of Performance Data

### Content of Standardized Tables

A separate set of tables is provided for each state. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/AA; (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 30<sup>th</sup> of each year. Tables without data are not included in this PE. Detail numbers in tables may not sum to totals due to rounding.

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/AA. Community development loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. See Interagency Q&As \_\_.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such loans.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank, if applicable, over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multi-family Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

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

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

**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 AA. See Interagency Q&As \_\_.12 (h) - 6 and - 7 for guidance on when a bank may receive positive CRA consideration for such investments.

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

NOTE: Detail on tables may not sum to totals because of rounding.

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**Table 1. Lending Volume**

Lending Volume		Geography: Multistate New York						Evaluation Period: January 1, 2007 to December 31, 2010				% of Deposits in MA/AA*
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
New York-White Plains-Wayne, NY-NJ MD	57.75	97,072	39,305,147	35,105	3,787,078	20	2,041	770	1,662,123	132,967	44,756,389	87.66
<b>Limited Review:</b>												
Edison-New Brunswick, NJ MD	13.06	28,144	7,966,822	1,899	167,264	3	422	18	39,119	30,064	8,173,627	0.90
Nassau-Suffolk, NY MD	17.88	29,955	10,299,512	11,177	1,069,998	13	1,815	33	197,322	41,178	11,568,647	9.28
Newark-Union, NJ-PA MD	11.31	22,998	7,325,223	3,007	288,083	2	28	45	57,980	26,052	7,671,314	2.16

\* Deposit data as of June 30, 2010.

**Table 1. Other Products**

Lending Volume		Geography: Multistate New York										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	95.18	79	1,414,718	79	1,414,718	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	87.66	
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	1.20	1	951	1	951	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.90	
Nassau-Suffolk, NY MD	2.41	2	25,296	2	25,296	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.28	
Newark-Union, NJ-PA MD	1.20	1	55	1	55	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.16	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Multistate New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	44,061	63.15	2.00	4.13	11.78	15.84	26.48	25.41	59.75	54.63	7.84	8.73	6.41	7.35	8.39
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	7,760	11.12	3.50	2.65	14.87	16.25	51.71	49.29	29.93	31.80	4.51	4.32	4.49	4.16	5.14
Nassau-Suffolk, NY MD	12,388	17.75	0.22	0.36	12.21	15.17	66.17	62.51	21.40	21.96	7.59	8.11	6.72	7.41	8.98
Newark-Union, NJ-PA MD	5,565	7.98	3.15	7.08	12.31	14.72	35.02	29.16	49.52	49.04	4.21	1.47	1.93	4.01	5.45

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Multistate New York										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
New York-White Plains-Wayne, NY-NJ MD	2,581	51.51	2.00	3.25	11.78	15.42	26.48	27.35	59.75	53.97	3.44	3.77	4.15	3.03	3.48	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	535	10.68	3.50	3.36	14.87	16.82	51.71	49.16	29.93	30.65	1.29	1.54	1.55	0.90	1.89	
Nassau-Suffolk, NY MD	1,407	28.08	0.22	0.57	12.21	15.07	66.17	68.30	21.40	16.06	2.10	16.67	2.22	1.92	2.61	
Newark-Union, NJ-PA MD	488	9.74	3.15	3.89	12.31	12.91	35.02	35.25	49.52	47.95	2.21	1.89	0.00	1.43	3.24	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Multistate New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	46,555	47.07	2.00	1.93	11.78	10.55	26.48	21.60	59.75	65.93	12.00	9.20	8.45	10.27	13.08
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	19,755	19.97	3.50	1.15	14.87	11.36	51.71	50.90	29.93	36.59	6.53	5.20	5.22	6.13	7.55
Nassau-Suffolk, NY MD	16,055	16.23	0.22	0.32	12.21	14.00	66.17	65.92	21.40	19.76	8.25	6.41	7.47	8.17	8.97
Newark-Union, NJ-PA MD	16,551	16.73	3.15	2.57	12.31	8.34	35.02	32.14	49.52	56.95	7.79	2.53	3.55	7.25	8.95

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 5. Geographic Distribution of Multi-Family (MF) Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Multistate New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of MF Units **	% Bank Loans	% of MF Units **	% Bank Loans	% of MF Units **	% Bank Loans	% of MF Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	3,719	86.25	17.72	18.39	29.34	43.59	21.19	22.32	31.74	15.70	1.30	1.33	1.26	1.40	1.23
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	94	2.18	7.81	20.21	24.08	29.79	53.46	44.68	14.66	5.32	0.00	0.00	0.00	0.00	0.00
Nassau-Suffolk, NY MD	105	2.44	3.51	10.48	27.94	23.81	58.07	56.19	10.49	9.52	1.25	0.00	0.00	1.96	0.00
Newark-Union, NJ-PA MD	394	9.14	25.36	25.13	33.76	55.84	25.56	15.23	15.32	3.81	0.56	0.00	0.00	2.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Multistate New York						Evaluation Period: January 1, 2007 to December 31, 2010						
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	Over-all	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	34,732	68.36	6.46	5.85	17.41	17.09	21.43	22.17	53.75	54.90	1.07	0.85	1.02	1.00	1.12
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	1,890	3.72	3.04	3.76	13.18	14.07	51.46	49.74	32.21	32.43	0.54	0.86	0.79	0.53	0.46
Nassau-Suffolk, NY MD	11,177	22.00	0.66	0.31	13.28	12.42	62.78	63.73	23.27	23.54	1.22	1.32	1.35	1.26	1.05
Newark-Union, NJ-PA MD	3,007	5.92	8.66	5.89	15.58	13.93	31.87	29.60	43.88	50.58	0.72	0.61	0.79	0.74	0.70

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Multistate New York						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	20	52.63	2.31	5.00	7.16	5.00	16.94	20.00	73.47	70.00	1.67	0.00	1.79	0.00	2.44
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	3	7.89	1.07	0.00	8.83	0.00	53.33	100.00	36.77	0.00	1.89	0.00	0.00	3.64	0.00
Nassau-Suffolk, NY MD	13	34.21	0.30	0.00	17.32	7.69	65.89	53.85	16.48	38.46	1.40	0.00	0.00	2.44	0.00
Newark-Union, NJ-PA MD	2	5.26	1.09	0.00	6.13	0.00	35.53	50.00	57.24	50.00	0.94	0.00	0.00	3.33	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Multistate New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	44,176	63.21	25.76	0.66	15.40	6.19	16.77	16.62	42.07	76.52	8.56	10.80	10.22	8.65	8.32
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	7,760	11.10	19.11	4.87	18.58	18.54	22.73	27.33	39.58	49.27	4.75	3.31	4.13	4.72	5.63
Nassau-Suffolk, NY MD	12,388	17.73	18.03	3.49	18.61	19.16	24.19	29.53	39.18	47.81	8.22	9.34	8.75	7.60	8.30
Newark-Union, NJ-PA MD	5,565	7.96	22.05	2.07	16.60	14.43	20.25	26.05	41.11	57.44	4.49	3.04	3.96	3.86	5.32

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 14.8% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: Multistate New York										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
New York-White Plains-Wayne, NY-NJ MD	2,581	51.51	25.76	2.41	15.40	7.23	16.77	19.15	42.07	71.21	3.47	2.61	1.09	4.57	3.53	
<b>Limited Review:</b>																
Edison-New Brunswick, NJ MD	535	10.68	19.11	6.12	18.58	20.18	22.73	33.33	39.58	40.37	1.27	1.32	1.01	1.32	1.36	
Nassau-Suffolk, NY MD	1,407	28.08	18.03	7.54	18.61	20.73	24.19	30.03	39.18	41.71	2.10	1.72	2.53	1.68	2.26	
Newark-Union, NJ-PA MD	488	9.74	22.05	4.21	16.60	18.12	20.25	28.80	41.11	48.87	2.02	1.29	1.48	2.43	2.09	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 37.5% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Multistate New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
New York-White Plains-Wayne, NY-NJ MD	46,594	47.09	25.76	1.76	15.40	6.84	16.77	17.08	42.07	74.33	13.68	13.75	14.75	13.26	13.69
<b>Limited Review:</b>															
Edison-New Brunswick, NJ MD	19,755	19.96	19.11	6.03	18.58	18.29	22.73	28.64	39.58	47.03	7.51	7.57	7.40	7.38	7.64
Nassau-Suffolk, NY MD	16,055	16.22	18.03	5.83	18.61	21.52	24.19	31.79	39.18	40.87	9.11	10.59	9.52	8.81	8.92
Newark-Union, NJ-PA MD	16,551	16.73	22.05	3.75	16.60	13.35	20.25	26.14	41.11	56.76	9.09	9.00	8.87	8.72	9.32

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 20.3% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Multistate New York			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
New York-White Plains-Wayne, NY-NJ MD	35,105	68.58	75.73	58.72	86.03	5.85	8.12	1.08	1.39
<b>Limited Review:</b>									
Edison-New Brunswick, NJ MD	1,899	3.71	78.21	28.70	88.73	3.79	7.48	0.54	0.25
Nassau-Suffolk, NY MD	11,177	21.84	80.65	53.89	86.53	5.63	7.84	1.22	1.38
Newark-Union, NJ-PA MD	3,007	5.87	77.63	44.10	87.86	4.49	7.65	0.72	0.33

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 15.15% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Multistate New York			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
New York-White Plains-Wayne, NY-NJ MD	20	52.63	95.49	35.00	80.00	5.00	15.00	1.65	0.00
<b>Limited Review:</b>									
Edison-New Brunswick, NJ MD	3	7.89	95.43	66.67	33.33	66.67	0.00	1.89	1.82
Nassau-Suffolk, NY MD	13	34.21	95.91	38.46	69.23	15.38	15.38	1.40	0.00
Newark-Union, NJ-PA MD	2	5.26	96.36	50.00	100.00	0.00	0.00	0.94	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 31.58% of small loans to farms originated and purchased by the bank.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Multistate New York				January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
New York-White Plains-Wayne, NY-NJ	331	148,963	1,341	482,660	1,672	631,623	86.62%	27	160,173	
<b>Limited Review:</b>										
Edison-New Brunswick, NJ MD	9	1,787	23	17,511	32	19,298	2.65%	1	269	
Nassau-Suffolk, NY MD	13	10,315	123	28,346	136	38,661	5.30%	7	17,050	
Newark-Union, NJ-PA MD	19	8,201	145	31,441	164	39,642	5.44%	2	1,350	

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Multistate New York																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
New York-White Plains-Wayne, NY-NJ MD	87.66	607	100.00	5.93	16.64	22.57	54.04	38	6	1	7	9	15	12.39	26.06	26.15	35.24
<b>Limited Review:</b>																	
Edison-New Brunswick, NJ MD	0.90	56	100.00	3.57	14.29	53.57	26.79	22	2	1	2	9	8	3.91	17.20	51.81	26.93
Nassau-Suffolk, NY MD	9.28	197	100.00	1.02	12.18	67.51	19.29	12	4	0	2	6	0	0.76	16.02	64.36	18.86
Newark-Union, NJ-PA MD	2.16	71	100.00	5.63	14.08	30.99	49.30	3	2	-1	0	2	0	11.19	22.22	30.44	36.15

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this multistate rating area, 260 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume 2010		Geography: Multistate Chicago						Evaluation Period: January 1, 2007 to December 31,				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Chicago-Joliet-Naperville, IL MD	85.91	165,918	40,638,758	13,516	1,634,948	10	1,055	190	621,190	179,634	42,895,951	91.56
<b>Limited Review:</b>												
Gary, IN MD	5.16	10,085	1,493,756	660	85,531	3	196	35	100,471	10,783	1,679,954	3.57
Lake County-Kenosha County, IL-WI MD	8.93	17,335	4,393,148	1,332	170,927	1	67	15	34,016	18,683	4,598,158	4.88

\* Deposit data as of June 30, 2010.

**Table 1. Other Products**

Lending Volume 2010		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31,				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Chicago-Joliet-Naperville, IL MD	53.44	8	5,843	8	5,843	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	91.56
<b>Limited Review:</b>														
Gary, IN MD	26.67	4	4,000	4	4,000	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.57
Lake County-Kenosha County, IL-WI MD	20.00	3	1,152	3	1,152	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.88

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Multistate Chicago						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	47,744	86.35	2.59	4.76	15.03	16.85	45.23	37.04	37.15	41.36	8.32	6.31	8.26	7.63	9.18
<b>Limited Review:</b>															
Gary, IN MD	3,383	6.12	2.03	0.47	18.70	8.28	45.55	49.72	33.71	41.53	8.23	8.00	6.41	8.58	8.11
Lake County-Kenosha County, IL-WI MD	4,165	7.53	1.51	1.18	20.24	16.64	40.98	47.08	37.26	35.10	7.00	4.07	5.30	7.22	7.91

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	2,778	85.16	2.59	3.85	15.03	18.14	45.23	43.81	37.15	34.20	3.90	1.27	2.48	4.06	4.56
<b>Limited Review:</b>															
Gary, IN MD	257	7.88	2.03	3.11	18.70	19.07	45.55	46.30	33.71	31.52	1.41	0.00	1.27	1.26	1.61
Lake County-Kenosha County, IL-WI MD	227	6.96	1.51	1.32	20.24	17.18	40.98	45.81	37.26	35.68	2.67	0.00	1.37	1.73	5.28

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	113,960	85.51	2.59	2.37	15.03	10.84	45.23	34.83	37.15	51.95	10.79	9.51	9.27	9.16	12.21
<b>Limited Review:</b>															
Gary, IN MD	6,432	4.83	2.03	0.51	18.70	8.15	45.55	43.10	33.71	48.24	7.65	3.39	5.40	7.09	8.36
Lake County-Kenosha County, IL-WI MD	12,874	9.66	1.51	0.66	20.24	10.34	40.98	39.06	37.26	49.94	9.26	5.42	5.95	8.18	11.14

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	1,315	94.13	12.02	7.60	24.02	38.02	35.72	33.23	28.23	21.14	1.45	0.00	1.14	1.03	4.28
<b>Limited Review:</b>															
Gary, IN MD	13	0.93	10.89	0.00	24.79	23.08	48.92	38.46	15.40	38.46	0.00	0.00	0.00	0.00	0.00
Lake County-Kenosha County, IL-WI MD	69	4.94	6.86	7.25	35.78	52.17	39.43	31.88	17.92	8.70	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	13,471	87.12	3.60	2.42	13.87	12.57	38.32	35.91	43.95	49.11	0.99	0.92	1.00	0.99	0.98
<b>Limited Review:</b>															
Gary, IN MD	660	4.27	3.71	1.97	13.80	11.82	44.18	48.64	38.32	37.58	0.94	2.67	0.92	0.89	0.92
Lake County-Kenosha County, IL-WI MD	1,332	8.61	2.15	1.20	17.25	10.29	35.91	32.43	44.69	56.08	0.87	0.29	0.40	0.91	1.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	10	71.43	1.24	0.00	7.93	40.00	52.48	20.00	38.34	40.00	0.09	0.00	4.76	0.00	0.00
<b>Limited Review:</b>															
Gary, IN MD	3	21.43	0.93	0.00	5.25	0.00	48.19	100.00	45.62	0.00	0.00	0.00	0.00	0.00	0.00
Lake County-Kenosha County, IL-WI MD	1	7.14	1.15	0.00	18.11	100.00	50.22	0.00	30.52	0.00	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	47,789	86.36	20.85	5.51	17.60	21.97	22.09	27.44	39.45	45.08	9.12	7.93	8.14	8.76	10.43
<b>Limited Review:</b>															
Gary, IN MD	3,383	6.11	20.22	9.01	17.66	27.32	22.92	30.78	39.19	32.89	8.93	9.24	9.14	9.51	7.94
Lake County-Kenosha County, IL-WI MD	4,165	7.53	18.97	13.32	18.40	24.19	22.80	24.77	39.82	37.73	7.69	8.24	7.25	7.38	7.97

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.4% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	2,778	85.16	20.85	6.91	17.60	20.51	22.09	29.03	39.45	43.54	3.95	2.13	2.74	4.79	4.53
<b>Limited Review:</b>															
Gary, IN MD	257	7.88	20.22	11.26	17.66	18.61	22.92	24.68	39.19	45.45	1.46	2.52	0.97	1.41	1.43
Lake County-Kenosha County, IL-WI MD	227	6.96	18.97	12.21	18.40	15.12	22.80	22.67	39.82	50.00	2.77	0.00	0.86	3.40	4.91

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 20.7% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Multistate Chicago								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	114,036	85.52	20.85	4.83	17.60	14.20	22.09	25.54	39.45	55.43	12.79	10.70	11.39	12.05	13.76
<b>Limited Review:</b>															
Gary, IN MD	6,432	4.82	20.22	7.16	17.66	18.76	22.92	30.48	39.19	43.60	8.86	7.16	8.15	9.15	9.27
Lake County-Kenosha County, IL-WI MD	12,874	9.65	18.97	7.17	18.40	15.70	22.80	24.35	39.82	52.77	10.63	9.53	9.98	9.63	11.56

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Multistate Chicago			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Chicago-Joliet-Naperville, IL MD	13,516	87.16	74.71	53.81	79.95	8.01	12.04	0.99	1.33
<b>Limited Review:</b>									
Gary, IN MD	660	4.26	76.96	40.00	73.64	13.03	13.33	0.94	0.40
Lake County-Kenosha County, IL-WI MD	1,332	8.59	78.27	47.82	78.75	9.08	12.16	0.87	0.89

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 18.55% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Multistate Chicago			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Chicago-Joliet-Naperville, IL MD	10	71.43	94.29	60.00	60.00	30.00	10.00	0.09	0.00
<b>Limited Review:</b>									
Gary, IN MD	3	21.43	96.15	100.00	66.67	33.33	0.00	0.00	0.00
Lake County-Kenosha County, IL-WI MD	1	7.14	93.36	0.00	100.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 28.57% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: Multistate Chicago					January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Chicago-Naperville-Joliet, IL MD	126	125,134	740	369,023	866	494,157	90.08%	25	82,038
<b>Limited Review:</b>									
Gary, IN MD	5	13,380	33	9,029	38	22,409	4.08%	3	31
Lake County-Kenosha County, IL-WI MD	4	5,106	23	26,908	27	32,014	5.84%	6	32,156



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Multistate Chicago																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Chicago-Joliet-Naperville, IL MD	91.56	353	100.00	3.12	15.86	34.84	46.18	48	28	-4	2	1	21	8.00	23.35	39.50	29.15
<b>Limited Review:</b>																	
Gary, IN MD	3.57	33	100.00	3.03	18.18	48.48	30.30	0	0	0	0	0	0	4.37	23.15	43.90	28.58
Lake County-Kenosha County, IL-WI MD	4.88	40	100.00	5.00	12.50	37.50	45.00	6	0	0	2	3	1	3.53	27.25	37.38	31.84

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this multistate rating area, 60 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		Geography: Multistate Other MSAs						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Cincinnati-Middletown, OH-KY-IN MSA ^	100.00	13,913	2,313,498	1,266	129,495	4	590	7	38,575	15,190	2,482,158	100.00
Louisville-Jefferson County, KY-IN MSA ^	100.00	14,025	2,160,059	1,013	199,989	3	539	17	40,177	15,058	2,400,764	100.00
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	100.00	22,456	5,611,089	1,583	94,797	2	258	118	182,675	24,159	5,888,819	100.00
Wheeling, WV-OH MSA ^	100.00	755	65,236	59	6,702	0	0	0	0	814	71,938	100.00

\* Deposit data as of June 30, 2010.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 1. Other Products**

Lending Volume		Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Cincinnati-Middletown, OH-KY-IN MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
^ Louisville-Jefferson County, KY-IN MSA	100.00	1	11,224	1	11,224	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Wheeling, WV-OH MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00

\* Deposit data as of June 30, 2010.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	6,088	100.00	2.38	1.66	14.70	11.32	51.43	51.30	31.49	35.73	4.80	2.90	4.42	5.24	4.39
Louisville-Jefferson County, KY-IN MSA ^	5,170	100.00	2.01	0.89	15.77	10.21	46.29	47.27	35.93	41.62	6.40	2.58	4.65	7.58	5.68
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	5,155	100.00	0.71	0.37	15.43	15.54	55.69	56.20	28.18	27.90	4.62	2.21	3.56	5.21	4.27
Wheeling, WV-OH MSA ^	428	100.00	1.14	0.00	14.47	13.32	58.25	70.33	26.14	16.36	12.47	0.00	11.83	16.33	6.02

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	154	100.00	2.38	3.90	14.70	22.73	51.43	52.60	31.49	20.78	0.68	4.35	0.41	0.95	0.14
Louisville-Jefferson County, KY-IN MSA ^	217	100.00	2.01	2.76	15.77	14.75	46.29	47.00	35.93	35.48	1.29	0.00	0.51	2.07	0.76
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	485	100.00	0.71	0.00	15.43	15.88	55.69	50.10	28.18	34.02	5.38	0.00	4.65	4.30	7.67
Wheeling, WV-OH MSA ^	16	100.00	1.14	0.00	14.47	43.75	58.25	43.75	26.14	12.50	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Multistate Other MSAs										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Cincinnati-Middletown, OH-KY-IN MSA ^	7,637	100.00	2.38	1.37	14.70	10.38	51.43	46.46	31.49	41.78	2.46	1.72	1.98	2.42	2.58	
Louisville-Jefferson County, KY-IN MSA ^	8,631	100.00	2.01	1.37	15.77	8.84	46.29	40.05	35.93	49.74	5.50	3.91	3.99	5.67	5.59	
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	16,157	100.00	0.71	0.55	15.43	11.39	55.69	50.56	28.18	37.50	6.61	5.25	5.23	6.42	7.40	
Wheeling, WV-OH MSA ^	311	100.00	1.14	0.96	14.47	8.04	58.25	59.49	26.14	31.51	3.99	25.00	2.42	3.87	4.37	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	34	100.00	17.48	8.82	22.32	41.18	43.96	35.29	16.23	14.71	0.00	0.00	0.00	0.00	0.00
Louisville-Jefferson County, KY-IN MSA ^	7	100.00	10.43	42.86	27.22	0.00	37.90	28.57	24.45	28.57	0.00	0.00	0.00	0.00	0.00
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	659	100.00	3.45	3.79	34.95	43.25	43.30	39.00	18.31	13.96	4.32	0.00	7.04	2.56	4.00
Wheeling, WV-OH MSA ^	0	100.00	9.73	0.00	36.98	0.00	26.54	0.00	26.75	0.00	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	1,252	100.00	5.03	4.39	16.34	18.45	47.72	47.12	30.12	30.03	0.52	0.41	0.69	0.54	0.42
Louisville-Jefferson County, KY-IN MSA ^	1,013	100.00	3.61	6.61	20.04	29.42	35.19	30.60	41.16	33.37	0.88	1.89	1.36	0.75	0.69
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	1,583	100.00	3.85	3.10	20.38	16.74	48.69	46.24	27.08	33.92	0.24	0.36	0.32	0.24	0.17
Wheeling, WV-OH MSA ^	59	100.00	3.42	3.39	33.84	38.98	38.93	37.29	23.80	20.34	0.54	0.00	0.97	0.24	0.52

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010



**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Multistate Other MSAs						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	4	100.00	1.19	0.00	11.02	0.00	59.69	100.00	28.00	0.00	0.00	0.00	0.00	0.00	0.00
Louisville-Jefferson County, KY-IN MSA ^	3	100.00	0.88	0.00	9.37	0.00	46.07	33.33	43.68	66.67	0.45	0.00	0.00	0.00	1.04
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	2	100.00	1.09	0.00	10.15	0.00	64.87	50.00	23.89	50.00	0.51	0.00	0.00	0.37	1.06
Wheeling, WV-OH MSA ^	0	100.00	2.65	0.00	7.28	0.00	60.26	0.00	29.80	0.00	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

Borrower Distribution: HOME PURCHASE		Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	6,088	4.29	18.81	11.58	18.19	28.23	22.97	27.32	40.03	32.87	4.58	4.23	5.23	4.57	4.03
Louisville-Jefferson County, KY-IN MSA ^	5,170	3.64	19.71	10.89	17.56	29.04	22.19	26.75	40.54	33.33	5.97	6.50	6.60	6.39	4.70
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	5,155	3.63	18.37	5.89	19.20	27.03	23.62	30.28	38.81	36.79	4.56	3.94	4.35	4.59	4.79
Wheeling, WV-OH MSA ^	428	0.30	20.50	14.81	18.67	31.22	21.59	34.39	39.24	19.58	8.22	13.33	8.93	12.36	3.80

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.0% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Multistate Other MSAs								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cincinnati-Middletown, OH-KY-IN MSA ^	154	1.68	18.81	13.39	18.19	26.77	22.97	27.56	40.03	32.28	0.73	1.36	1.33	0.41	0.39
Louisville-Jefferson County, KY-IN MSA ^	217	2.37	19.71	16.49	17.56	20.62	22.19	25.26	40.54	37.63	1.39	3.21	1.06	0.87	1.36
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	485	5.30	18.37	4.56	19.20	21.16	23.62	29.05	38.81	45.23	5.61	4.58	6.46	4.75	5.92
Wheeling, WV-OH MSA ^	16	0.17	20.50	13.33	18.67	26.67	21.59	40.00	39.24	20.00	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 33.8% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Multistate Other MSAs										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Cincinnati-Middletown, OH-KY-IN MSA ^	7,637	2.88	18.81	7.95	18.19	19.10	22.97	26.76	40.03	46.19	2.60	2.52	2.54	2.55	2.66	
Louisville-Jefferson County, KY-IN MSA ^	8,631	3.26	19.71	8.23	17.56	19.82	22.19	26.94	40.54	45.01	6.17	6.34	5.98	6.70	5.97	
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	16,157	6.10	18.37	5.12	19.20	18.00	23.62	27.76	38.81	49.12	7.42	6.49	7.73	7.20	7.52	
Wheeling, WV-OH MSA ^	311	0.12	20.50	10.00	18.67	17.50	21.59	22.50	39.24	50.00	4.29	1.41	5.39	4.23	4.36	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 23.3% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Multistate Other MSAs			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Cincinnati-Middletown, OH-KY-IN MSA ^	1,266	100.00	74.31	22.75	82.39	7.27	10.35	0.52	0.15
Louisville-Jefferson County, KY-IN MSA ^	1,013	100.00	77.18	29.32	62.19	15.30	22.51	0.88	0.73
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	1,583	100.00	79.19	77.26	92.61	3.92	3.47	0.24	0.18
Wheeling, WV-OH MSA ^	59	100.00	70.34	25.42	76.27	15.25	8.47	0.54	0.69

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 30.66% of small loans to businesses originated and purchased by the bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Multistate Other MSAs			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Cincinnati-Middletown, OH-KY-IN MSA ^	4	100.00	96.83	75.00	50.00	25.00	25.00	0.00	0.00
Louisville-Jefferson County, KY-IN MSA ^	3	100.00	96.97	66.67	33.33	66.67	0.00	0.45	0.54
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	2	100.00	95.03	50.00	50.00	50.00	0.00	0.51	0.38
Wheeling, WV-OH MSA ^	0	100.00	96.69	0.00	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 33.33% of small loans to farms originated and purchased by the bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Multistate Other MSAs				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Cincinnati-Middletown, OH-KY-IN MSA^	20	7,687	60	25,004	80	32,691	31.22%	0	0
Louisville/Jefferson County, KY-IN MSA^	10	5,450	66	20,326	76	25,776	24.61%	2	1,690
Portland-Vancouver-Hillsboro, OR-WA MSA^^	50	9,745	77	35,902	127	45,647	43.59%	2	5,060
Wheeling, WV-OH MSA^	6	519	3	86	9	605	0.58%	0	0

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Multistate Other MSAs																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Cincinnati-Middletown, OH-KY-IN MSA ^	100.00	31	100.00	0.00	22.58	51.61	25.81	1	0	0	0	0	1	6.80	18.14	47.69	27.27
Louisville-Jefferson County, KY-IN MSA ^	100.00	44	100.00	9.09	18.18	43.18	29.55	0	0	0	0	0	0	4.62	20.28	43.32	31.78
Portland-Vancouver-Hillsboro, OR-WA MSA ^^	100.00	71**	100.00	1.41	30.99	47.89	19.72	4	0	0	1	1	2	1.57	21.02	53.57	23.83
Wheeling, WV-OH MSA ^	100.00	5	100.00	0.00	60.00	20.00	20.00	0	0	0	0	0	0	1.87	18.06	54.74	25.34

Demographic Data Source: 2000 Census

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this multistate rating area, 67 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.



**Table 1. Lending Volume**

Lending Volume		Arizona						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Phoenix-Mesa-Glendale, AZ MSA	72.22	59,829	12,590,841	7,912	741,358	78	14,808	45	221,500	67,864	13,568,507	73.93
<b>Limited Review:</b>												
Flagstaff, AZ MSA	1.15	899	222,402	186	23,245	0	0	0	0	1,085	245,647	1.08
Lake Havasu City-Kingman, AZ MSA	2.57	2,181	352,867	218	21,962	1	15	14	14,920	2,414	389,764	2.19
Prescott, AZ MSA	3.49	2,815	590,559	448	45,615	0	0	15	21,198	3,278	657,372	3.16
Tucson, AZ MSA	14.47	12,254	2,221,927	1,330	122,591	5	971	8	19,025	13,597	2,364,514	13.47
Yuma, AZ MSA	1.46	1,238	158,045	129	11,143	3	242	2	1,950	1,372	171,380	1.38
Non-Metro AZ	4.64	3,876	629,958	392	40,541	53	11,568	36	12,604	4,357	694,671	4.79
<b>State Total</b>	<b>100.00</b>	<b>83,092</b>	<b>16,766,599</b>	<b>10,615</b>	<b>1,006,455</b>	<b>140</b>	<b>27,604</b>	<b>120</b>	<b>291,197</b>	<b>93,967</b>	<b>18,091,855</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Arizona								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Phoenix-Mesa-Glendale, AZ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	73.93
<b>Limited Review:</b>														
Flagstaff, AZ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.08
Lake Havasu City-Kingman, AZ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.19
Prescott, AZ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.16
Tucson, AZ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13.47
Yuma, AZ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.38
Non-Metro AZ	100.00	1	6,194	1	6,194	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.79
Statewide	100.00	1	6,194	1	6,194	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	26,274	76.53	1.63	0.81	24.02	22.18	39.20	44.36	35.14	32.66	5.82	2.68	7.02	6.04	4.89
<b>Limited Review:</b>															
Flagstaff, AZ MSA	249	0.73	1.65	2.81	5.29	1.61	55.67	59.84	37.39	35.74	2.36	7.14	0.00	2.39	2.34
Lake Havasu City-Kingman, AZ MSA	889	2.59	0.00	0.00	5.91	1.01	77.09	74.69	17.01	24.30	7.94	0.00	0.00	7.08	12.40
Prescott, AZ MSA	984	2.87	0.00	0.00	2.46	0.91	76.79	79.67	20.76	19.41	5.86	0.00	5.26	6.09	5.02
Tucson, AZ MSA	3,937	11.47	1.64	1.32	24.41	20.60	36.87	35.10	37.08	42.98	4.18	3.37	4.69	3.79	4.34
Yuma, AZ MSA	441	1.28	0.00	0.00	21.76	49.89	39.31	14.51	38.93	35.60	3.77	0.00	14.47	1.70	1.98
Non-Metro AZ	1,556	4.53	0.00	0.00	12.56	7.46	57.34	63.30	30.10	29.24	7.83	0.00	18.54	10.82	4.13
State Total	34,330	100.00	1.38	0.79	21.66	20.38	42.87	45.68	34.09	33.15	5.64	3.01	6.83	5.90	4.76

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	1,275	66.27	1.63	1.88	24.02	23.22	39.20	39.92	35.14	34.98	3.20	0.00	1.94	3.34	3.52
<b>Limited Review:</b>															
Flagstaff, AZ MSA	16	0.83	1.65	0.00	5.29	12.50	55.67	37.50	37.39	50.00	1.61	0.00	0.00	0.00	3.45
Lake Havasu City-Kingman, AZ MSA	76	3.95	0.00	0.00	5.91	6.58	77.09	76.32	17.01	17.11	2.65	0.00	0.00	2.52	3.45
Prescott, AZ MSA	57	2.96	0.00	0.00	2.46	5.26	76.79	78.95	20.76	15.79	2.12	0.00	0.00	2.16	2.08
Tucson, AZ MSA	284	14.76	1.64	2.11	24.41	20.07	36.87	41.90	37.08	35.92	1.81	14.29	2.44	1.84	1.35
Yuma, AZ MSA	85	4.42	0.00	0.00	21.76	55.29	39.31	28.24	38.93	16.47	0.88	0.00	0.00	3.33	0.00
Non-Metro AZ	131	6.81	0.00	0.00	12.56	10.69	57.34	54.96	30.10	34.35	3.13	0.00	0.00	2.75	3.85
State Total	1,924	100.00	1.38	1.56	21.66	22.04	42.87	43.30	34.09	33.11	2.77	4.55	1.90	2.82	2.94

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE			Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	32,028	68.81	1.63	0.81	24.02	14.06	39.20	36.02	35.14	49.12	6.79	4.92	5.19	6.26	7.53
<b>Limited Review:</b>															
Flagstaff, AZ MSA	634	1.36	1.65	1.74	5.29	4.89	55.67	54.26	37.39	39.12	4.36	4.35	5.74	3.76	5.11
Lake Havasu City-Kingman, AZ MSA	1,212	2.60	0.00	0.00	5.91	1.32	77.09	75.66	17.01	23.02	7.40	0.00	1.82	7.04	9.11
Prescott, AZ MSA	1,771	3.81	0.00	0.00	2.46	1.30	76.79	75.21	20.76	23.49	6.05	0.00	10.71	6.10	5.77
Tucson, AZ MSA	7,999	17.19	1.64	0.98	24.41	16.14	36.87	31.44	37.08	51.44	5.98	5.13	4.64	5.65	6.45
Yuma, AZ MSA	712	1.53	0.00	0.00	21.76	31.32	39.31	23.88	38.93	44.80	5.65	0.00	9.90	5.37	4.82
Non-Metro AZ	2,187	4.70	0.00	0.00	12.56	7.54	57.34	55.37	30.10	37.08	6.10	0.00	8.70	6.31	5.74
State Total	46,543	100.00	1.38	0.75	21.66	13.43	42.87	38.73	34.09	47.09	6.51	4.94	5.23	6.10	7.09

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	243	84.97	6.87	7.00	41.48	38.68	36.08	35.39	15.57	18.93	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Flagstaff, AZ MSA	0	0.00	17.02	0.00	7.89	0.00	56.39	0.00	18.70	0.00	0.00	0.00	0.00	0.00	0.00
Lake Havasu City-Kingman, AZ MSA	4	1.40	0.00	0.00	2.03	0.00	83.25	75.00	14.72	25.00	0.00	0.00	0.00	0.00	0.00
Prescott, AZ MSA	3	1.05	0.00	0.00	13.37	0.00	66.24	66.67	20.39	33.33	0.00	0.00	0.00	0.00	0.00
Tucson, AZ MSA	34	11.89	4.97	8.82	38.30	23.53	38.46	41.18	18.28	26.47	0.00	0.00	0.00	0.00	0.00
Yuma, AZ MSA	0	0.00	0.00	0.00	18.39	0.00	58.18	0.00	23.43	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro AZ	2	0.70	0.00	0.00	16.16	0.00	44.33	100.00	39.52	0.00	0.00	0.00	0.00	0.00	0.00
State Total	286	100.00	6.26	6.99	38.62	35.66	38.38	37.41	16.73	19.93	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Arizona						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	7,911	74.53	4.09	4.99	21.50	22.85	32.27	30.29	42.06	41.87	0.63	1.43	0.88	0.55	0.53
<b>Limited Review:</b>															
Flagstaff, AZ MSA	186	1.75	9.04	15.05	6.71	12.37	62.90	53.23	21.35	19.35	0.93	1.75	1.55	0.81	0.71
Lake Havasu City-Kingman, AZ MSA	218	2.05	0.00	0.00	2.99	2.75	80.34	86.70	16.67	10.55	0.30	0.00	0.00	0.38	0.00
Prescott, AZ MSA	448	4.22	0.00	0.00	6.71	7.59	70.47	68.75	22.81	23.66	0.75	0.00	1.32	0.61	1.00
Tucson, AZ MSA	1,330	12.53	3.36	4.81	27.50	35.94	34.03	31.05	35.12	28.20	0.63	0.64	1.00	0.55	0.44
Yuma, AZ MSA	129	1.22	0.00	0.00	27.75	34.11	31.00	27.13	41.25	38.76	0.29	0.00	0.52	0.00	0.34
Non-Metro AZ	392	3.69	0.00	0.00	11.45	15.56	60.10	67.60	28.44	16.84	0.77	0.00	1.45	0.94	0.22
State Total	10,614	100.00	3.52	4.59	20.42	23.12	37.58	34.91	38.41	37.38	0.63	1.35	0.92	0.57	0.52

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	78	55.71	2.15	1.28	23.42	41.03	36.15	32.05	38.21	25.64	2.43	0.00	6.10	0.97	0.97
<b>Limited Review:</b>															
Flagstaff, AZ MSA	0	0.00	5.03	0.00	6.92	0.00	53.46	0.00	34.59	0.00	0.00	0.00	0.00	0.00	0.00
Lake Havasu City-Kingman, AZ MSA	1	0.71	0.00	0.00	4.04	0.00	83.84	100.00	12.12	0.00	0.00	0.00	0.00	0.00	0.00
Prescott, AZ MSA	0	0.00	0.00	0.00	3.69	0.00	70.93	0.00	25.38	0.00	0.00	0.00	0.00	0.00	0.00
Tucson, AZ MSA	5	3.57	1.86	0.00	25.53	0.00	36.26	0.00	36.35	100.00	2.74	0.00	0.00	0.00	6.67
Yuma, AZ MSA	3	2.14	0.00	0.00	24.44	0.00	29.70	33.33	45.86	66.67	0.00	0.00	0.00	0.00	0.00
Non-Metro AZ	53	37.86	0.00	0.00	7.35	0.00	66.84	98.11	25.80	1.89	3.70	0.00	0.00	4.76	0.00
<b>State Total</b>	<b>140</b>	<b>100.00</b>	<b>1.75</b>	<b>0.71</b>	<b>20.53</b>	<b>22.86</b>	<b>41.93</b>	<b>56.43</b>	<b>35.75</b>	<b>20.00</b>	<b>2.27</b>	<b>0.00</b>	<b>4.24</b>	<b>1.63</b>	<b>1.82</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data



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

Borrower Distribution: HOME PURCHASE		Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	26,281	76.54	19.62	11.47	18.79	25.72	21.81	23.58	39.78	39.24	5.41	6.52	6.23	4.98	4.60
<b>Limited Review:</b>															
Flagstaff, AZ MSA	249	0.73	18.58	0.97	15.63	6.28	21.63	22.71	44.16	70.05	2.27	0.00	1.75	2.22	2.49
Lake Havasu City-Kingman, AZ MSA	889	2.59	14.66	5.96	18.78	20.72	23.74	25.78	42.82	47.54	7.26	11.26	8.46	8.87	5.82
Prescott, AZ MSA	984	2.87	17.21	4.55	20.02	19.52	23.60	23.53	39.17	52.41	4.72	2.82	4.11	5.33	4.89
Tucson, AZ MSA	3,937	11.47	19.77	6.78	18.47	18.79	21.20	25.54	40.56	48.89	4.38	4.69	4.52	4.80	3.97
Yuma, AZ MSA	441	1.28	20.46	11.71	18.18	35.74	21.05	23.72	40.31	28.83	2.10	5.08	3.87	1.09	1.54
Non-Metro AZ	1,556	4.53	18.56	4.52	17.59	15.82	19.66	23.57	44.19	56.09	6.70	14.86	11.41	8.63	5.12
State Total	34,337	100.00	19.34	10.17	18.65	24.09	21.70	23.87	40.31	41.87	5.25	6.39	6.04	5.03	4.49

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 20.5% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	1,275	66.27	19.62	7.76	18.79	20.87	21.81	23.39	39.78	47.98	3.40	1.32	4.87	3.05	3.30
<b>Limited Review:</b>															
Flagstaff, AZ MSA	16	0.83	18.58	0.00	15.63	23.08	21.63	7.69	44.16	69.23	1.64	0.00	0.00	0.00	2.50
Lake Havasu City-Kingman, AZ MSA	76	3.95	14.66	6.67	18.78	16.67	23.74	15.00	42.82	61.67	2.74	0.00	0.00	2.63	3.95
Prescott, AZ MSA	57	2.96	17.21	4.55	20.02	18.18	23.60	29.55	39.17	47.73	2.26	9.09	0.00	2.17	2.35
Tucson, AZ MSA	284	14.76	19.77	8.13	18.47	19.51	21.20	25.61	40.56	46.75	1.95	3.64	1.44	2.42	1.67
Yuma, AZ MSA	85	4.42	20.46	12.66	18.18	24.05	21.05	22.78	40.31	40.51	0.92	0.00	0.00	0.00	1.67
Non-Metro AZ	131	6.81	18.56	4.80	17.59	10.40	19.66	23.20	44.19	61.60	3.24	7.69	3.85	2.04	3.13
State Total	1,924	100.00	19.34	7.63	18.65	19.76	21.70	23.41	40.31	49.20	2.93	2.39	3.55	2.70	2.89

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 19.0% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Arizona								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	32,030	68.82	19.62	6.48	18.79	17.62	21.81	23.84	39.78	52.05	8.75	8.01	10.05	9.46	8.14
<b>Limited Review:</b>															
Flagstaff, AZ MSA	634	1.36	18.58	3.88	15.63	11.82	21.63	25.39	44.16	58.91	5.01	5.38	6.12	5.55	4.58
Lake Havasu City-Kingman, AZ MSA	1,212	2.60	14.66	3.76	18.78	16.41	23.74	24.56	42.82	55.28	9.11	5.66	10.64	9.82	8.70
Prescott, AZ MSA	1,771	3.80	17.21	4.77	20.02	14.79	23.60	24.04	39.17	56.41	7.30	7.77	8.61	6.54	7.18
Tucson, AZ MSA	7,999	17.19	19.77	5.82	18.47	16.75	21.20	23.91	40.56	53.52	7.36	4.35	8.85	7.46	7.42
Yuma, AZ MSA	712	1.53	20.46	6.30	18.18	19.96	21.05	24.87	40.31	48.86	7.15	8.04	7.44	8.98	6.33
Non-Metro AZ	2,187	4.70	18.56	3.38	17.59	11.34	19.66	18.96	44.19	66.32	8.08	6.32	9.53	8.36	7.90
State Total	46,545	100.00	19.34	6.03	18.65	16.96	21.70	23.67	40.31	53.33	8.26	6.90	9.63	8.78	7.81

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.8% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Arizona			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	7,912	74.54	78.20	60.72	86.48	7.03	6.50	0.63	0.72
<b>Limited Review:</b>									
Flagstaff, AZ MSA	186	1.75	76.89	49.46	76.88	13.98	9.14	0.93	1.41
Lake Havasu City-Kingman, AZ MSA	218	2.05	81.11	57.80	84.86	8.72	6.42	0.30	0.22
Prescott, AZ MSA	448	4.22	80.76	70.31	84.60	6.92	8.48	0.75	1.45
Tucson, AZ MSA	1,330	12.53	77.57	62.48	87.82	5.49	6.69	0.63	0.70
Yuma, AZ MSA	129	1.22	69.91	57.36	87.60	3.88	8.53	0.29	0.22
Non-Metro AZ	392	3.69	75.70	44.13	84.44	7.91	7.65	0.77	0.62
State Total	10,615	100.00	78.06	60.43	86.30	6.98	6.72	0.63	0.74

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 13.67% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Arizona			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	78	55.71	92.26	58.97	41.03	33.33	25.64	2.43	3.75
<b>Limited Review:</b>									
Flagstaff, AZ MSA	0	0.00	96.86	0.00	0.00	0.00	0.00	0.00	0.00
Lake Havasu City-Kingman, AZ MSA	1	0.71	96.46	100.00	100.00	0.00	0.00	0.00	0.00
Prescott, AZ MSA	0	0.00	97.40	0.00	0.00	0.00	0.00	0.00	0.00
Tucson, AZ MSA	5	3.57	94.93	100.00	40.00	20.00	40.00	2.74	4.55
Yuma, AZ MSA	3	2.14	74.81	66.67	66.67	33.33	0.00	0.00	0.00
Non-Metro AZ	53	37.86	95.99	62.26	32.08	33.96	33.96	3.70	2.63
State Total	140	100.00	92.87	62.14	38.57	32.86	28.57	2.27	3.08

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 2.86% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Arizona				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Phoenix-Mesa-Scottsdale, AZ	25	19,063	262	35,556	287	54,619	43.80%	5	34,045
<b>Limited Review:</b>									
Flagstaff, AZ	3	372	4	56	7	428	0.34%	0	0
Lake Havasu City - Kingman, AZ	2	646	1	955	3	1,601	1.28%	0	0
	3	418	9	23,601	12	24,019	19.26%	1	4,093
Prescott, AZ	9	1,462	100	8,202	109	9,664	7.75%	0	0
Tucson, AZ	3	132	5	67	8	199	0.16%	0	0
Yuma, AZ	7	1,089	12	33,069	19	34,158	27.39%	0	0
Non-Metro AZ	52	23,182	393	101,506	445	124,688	100.00%	6	38,138
Statewide Investments with Potential to Benefit one or more AAs	3	228	18	13,512	21	13,740	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	4	16	4	16	N/A	0	0

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Arizona																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Phoenix-Mesa-Glendale, AZ MSA	73.93	219	72.52	1.37	21.92	31.51	45.21	45	8	0	5	9	23	4.89	30.55	36.18	28.36
<b>Limited Review:</b>																	
Flagstaff, AZ MSA	1.08	4	1.32	25.00	0.00	75.00	0.00	0	0	0	0	0	0	9.80	8.84	53.60	27.76
Lake Havasu City-Kingman, AZ MSA	2.19	7	2.32	0.00	0.00	100.00	0.00	2	0	0	0	2	0	0.00	7.16	77.35	15.49
Prescott, AZ MSA	3.16	12	3.97	0.00	8.33	75.00	16.67	3	0	0	0	2	1	0.00	4.22	77.74	18.04
Tucson, AZ MSA	13.47	46	15.23	6.52	23.91	28.26	41.30	5	1	0	0	1	3	3.57	33.94	33.48	29.01
Yuma, AZ MSA	1.38	3	0.99	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	27.67	41.03	31.30
Non-Metro AZ	4.79	11	3.64	0.00	27.27	45.45	27.27	0	0	0	0	0	0	0.00	16.66	58.29	25.05
State Total	100.00	302	100.00	2.32	21.52	35.43	40.73	55	9	0	5	14	27	4.05	28.40	39.90	27.64

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 40 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

Table 1. Lending Volume

Lending Volume		State: California						Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Los Angeles-Long Beach-Glendale, CA MD	27.25	74,333	36,133,058	8,535	652,819	2	80	571	601,260	83,441	37,387,217	33.81
Oakland-Fremont-Hayward, CA MD	8.38	24,217	10,992,580	1,352	110,305	0	0	99	208,409	25,668	11,311,294	7.92
San Diego-Carlsbad-San Marcos, CA MSA	9.39	25,882	11,221,271	2,770	170,217	5	131	107	126,549	28,764	11,518,168	9.75
<b>Limited Review:</b>												
Bakersfield-Delano, CA MSA	1.23	3,316	623,841	424	21,434	2	36	10	28,656	3,752	673,967	0.88
Chico, CA MSA	0.40	1,152	262,036	82	4,950	0	0	4	5,063	1,238	272,049	0.54
Chico-Orland, CA MSA	0.25	719	120,998	52	1,742	3	248	5	5,650	779	128,638	0.19
Fresno, CA MSA	1.61	4,649	1,077,213	282	11,693	2	54	9	49,413	4,942	1,138,373	0.77
Hanford-Corcoran, CA MSA	0.23	676	135,990	19	430	0	0	2	4,076	697	140,496	0.05
Madera-Chowchilla, CA MSA	0.32	927	173,149	48	2,086	0	0	0	0	975	175,235	0.18
Merced, CA MSA	0.44	1,302	241,424	30	1,074	0	0	4	3,023	1,336	245,521	0.23
Modesto, CA MSA	1.06	3,068	674,589	161	7,611	0	0	3	1,554	3,232	683,754	0.86
Napa, CA MSA	0.39	1,149	573,641	55	3,827	0	0	2	1,431	1,206	578,899	0.19
Oxnard-Thousand Oaks-Ventura, CA MSA	2.86	8,011	3,285,109	740	45,908	2	73	20	29,170	8,773	3,360,260	2.82
Redding, CA MSA	0.37	1,092	224,112	38	2,129	0	0	5	6,357	1,135	232,598	0.22
Riverside-San Bernardino-Ontario, CA MSA	8.62	24,539	6,454,054	1,826	110,006	1	8	29	90,315	26,395	6,654,383	6.08
Sacramento--Arden-Arcade--Roseville, CA MSA	5.67	16,363	5,496,193	926	78,642	0	0	67	195,159	17,356	5,769,994	3.34
Sacramento--Arden-Arcade--Roseville, CA MSA	1.27	3,528	1,585,724	355	15,477	1	10	6	17,506	3,890	1,618,717	1.58
Santa Ana-Santa Ana-San Mateo-Redwood City, CA MD	6.26	17,741	11,386,544	1,339	111,128	0	0	83	114,834	19,163	11,612,506	7.32
San Jose-Sunnyvale-Santa Clara, CA MSA	5.90	16,935	8,932,780	1,084	99,791	0	0	56	135,642	18,075	9,168,213	6.62
San Luis Obispo-Paso Robles, CA MSA	1.03	2,962	1,077,844	191	7,841	0	0	4	3,622	3,157	1,089,307	0.86
Santa Ana-Anaheim-Irvine, CA MD	8.96	24,609	11,834,363	2,731	206,583	0	0	106	170,378	27,446	12,211,324	10.29
Santa Barbara-Santa Maria-Goleta, CA MSA	1.08	3,092	1,679,985	197	10,491	1	52	3	23,516	3,293	1,714,044	0.91
Santa Cruz-Watsonville, CA MSA	0.98	2,860	1,231,471	148	10,542	0	0	4	16,240	3,012	1,258,253	0.83
Santa Rosa-Petaluma, CA MSA	1.47	4,181	1,631,661	310	18,303	1	54	6	20,271	4,498	1,670,289	0.98
Stockton, CA MSA	1.37	4,019	1,088,906	186	10,529	0	0	4	9,294	4,209	1,108,729	0.68
Stockton, CA MSA	0.89	2,634	867,090	78	6,220	0	0	18	32,260	2,730	905,570	0.47
Vallejo-Fairfield, CA MSA	0.99	2,959	533,617	69	4,007	1	9	3	14,930	3,032	552,563	0.20
Visalia-Porterville, CA MSA	0.30	856	208,350	51	1,821	1	37	1	513	909	210,721	0.33
Non-Metro CA	1.02	2,955	800,948	174	8,669	0	0	4	8,351	3,133	817,968	1.10
<b>State Total</b>	<b>100.00</b>	<b>280,726</b>	<b>120,548,541</b>	<b>24,253</b>	<b>1,736,275</b>	<b>22</b>	<b>792</b>	<b>1,235</b>	<b>1,923,442</b>	<b>306,236</b>	<b>124,209,050</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	3	28,223	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	3	7,685	0	0	N/A

\* Deposit data as of June 30, 2010.



Table 1. Other Products

Lending Volume		California						Evaluation Period: September 26, 2008 to December 31, 2010						
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Los Angeles-Long Beach-Glendale, CA MD	4.48	1	3,522	1	3,522	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33.81
Oakland-Fremont-Hayward, CA MD	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.92
San Diego-Carlsbad-San Marcos, CA MSA	12.51	1	9,839	1	9,839	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.75
<b>Limited Review:</b>														
Bakersfield-Delano, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.88
Chico-CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.54
Chico-CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.19
Fresno, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.77
Hanford-Corcoran, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.05
Madera-Chowchilla, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.18
Merced, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.23
Modesto, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.86
Napa, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.19
Oxnard-Thousand Oaks-Ventura, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.82
Redding, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.22
Riverside-San Bernardino-Ontario, CA MSA	4.14	1	3,255	1	3,255	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.08
Sacramento--Arden-Arcade--Roseville, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.34
Sacramento--Arden-Arcade--Roseville, CA MSA	14.09	1	11,079	1	11,079	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.58
Santa Cruz-CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.32
Santa Cruz-CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.32
San Jose-Sunnyvale-Santa Clara, CA MSA	58.13	3	45,720	3	45,720	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.62
San Luis Obispo-Paso Robles, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.86
Santa Ana-Anaheim-Irvine, CA MD	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.29
Santa Barbara-Santa Maria-Goleta, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.91
Santa Cruz-Watsonville, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.83
Santa Rosa-Petaluma, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.98
Stockton, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.68
Stockton, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.47
Vallejo-Fairfield, CA MSA	3.88	1	3,053	1	3,053	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.20
Yuba City, CA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.33
Non-Metro CA	2.78	1	2,187	1	2,187	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.10
	100.00	9	78,657	9	78,657	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**JPMorgan Chase Bank, N.A.**

**Charter Number: 8**

\* Deposit data as of June 30, 2010.

Table 2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE			Geography: California						Evaluation Period: September 26, 2008 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	13,487	19.19	1.91	2.68	15.46	16.31	31.30	28.74	51.33	52.27	3.05	2.17	2.77	2.86	3.38
Oakland-Fremont-Hayward, CA MD	5,701	8.11	3.49	3.70	13.07	12.98	43.58	39.99	39.86	43.33	2.62	2.01	2.08	2.57	3.04
San Diego-Carlsbad-San Marcos, CA MSA	5,784	8.23	2.30	3.92	14.03	11.74	41.01	37.41	42.66	46.92	2.75	2.55	2.25	2.87	2.82
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	1,605	2.28	2.10	1.25	23.06	17.45	33.51	33.96	41.33	47.35	3.12	0.00	4.16	3.39	2.75
Chico, CA MSA	304	0.43	0.38	0.66	14.86	11.51	60.46	61.51	24.30	26.32	3.00	0.00	1.69	3.56	2.60
Chico-CA MSA	472	0.67	0.00	0.00	23.53	15.68	42.36	36.02	34.11	48.31	7.16	0.00	8.22	6.50	7.45
Fresno, CA MSA	2,039	2.90	1.60	1.32	21.71	20.06	35.87	41.54	40.82	37.08	4.83	3.85	6.50	5.61	3.76
Hanford-Corcoran, CA MSA	367	0.52	0.00	0.00	22.35	20.16	39.08	39.78	38.57	40.05	10.08	0.00	11.28	12.85	7.91
Madera-Chowchilla, CA MSA	436	0.62	0.00	0.00	11.37	8.49	52.17	66.74	36.46	24.77	5.62	0.00	2.81	5.92	5.81
Merced, CA MSA	731	1.04	0.00	0.00	17.13	20.11	50.94	50.89	31.94	29.00	3.86	0.00	6.11	5.30	1.75
Modesto, CA MSA	1,300	1.85	1.12	0.69	14.63	13.54	53.88	57.15	30.36	28.62	3.17	6.41	2.92	2.98	3.68
Napa, CA MSA	241	0.34	0.00	0.00	13.85	18.67	60.87	61.83	25.28	19.50	1.93	0.00	2.21	2.05	0.79
Oxnard-Thousand Oaks-Ventura, CA MSA	1,455	2.07	1.20	0.69	15.46	15.12	46.06	46.87	37.29	37.32	3.16	0.68	1.83	3.13	4.23
Redding, CA MSA	369	0.52	0.00	0.00	12.78	23.31	70.92	62.06	16.30	14.63	4.43	0.00	7.10	4.28	2.96
Riverside-San Bernardino-Ontario, CA MSA	9,613	13.68	1.49	1.33	21.74	25.32	43.33	43.74	33.44	29.61	2.98	2.61	4.15	2.72	2.64
Sacramento--Arden-Arcade--Roseville, CA MSA	5,060	7.20	3.32	3.12	18.33	14.45	42.14	41.44	36.21	40.99	3.04	2.60	2.55	3.28	3.02
Sacramento--Arden-Arcade--Roseville, CA MSA	1,116	1.59	0.00	0.00	13.83	19.09	45.09	47.49	41.08	33.42	5.64	0.00	6.17	6.07	4.52
Santa Fe Springs-San Mateo-Redwood City, CA MD	3,211	4.57	1.54	4.95	12.79	13.08	45.12	38.93	40.55	43.04	1.92	1.88	1.96	1.89	1.93
San Jose-Sunnyvale-Santa Clara, CA MSA	3,510	4.99	1.13	2.48	16.54	22.05	47.80	46.10	34.53	29.37	2.72	2.86	3.36	2.48	2.46
San Luis Obispo-Paso Robles, CA MSA	745	1.06	0.00	0.00	10.27	11.81	75.43	76.64	14.31	11.54	5.90	0.00	4.87	6.17	5.08
Santa Ana-Anaheim-Irvine, CA MD	5,137	7.31	1.25	1.42	19.56	20.36	33.56	29.41	45.63	48.80	2.57	2.29	3.07	2.33	2.49
Santa Barbara-Santa Maria-Goleta, CA MSA	693	0.99	0.97	1.44	17.42	21.07	39.94	42.42	41.68	35.06	3.95	1.30	4.09	4.22	3.49
Santa Cruz-Watsonville, CA MSA	653	0.93	0.00	0.00	20.21	23.89	40.44	39.36	39.35	36.75	6.28	0.00	6.17	7.08	5.43
Santa Rosa-Petaluma, CA MSA	845	1.20	0.00	0.00	9.17	10.89	71.27	72.66	19.56	16.45	2.18	0.00	2.46	2.21	1.85
Stockton, CA MSA	1,620	2.30	1.80	1.36	19.48	13.52	39.28	31.23	39.43	53.89	2.81	2.20	2.91	2.68	2.89
Vallejo-Fairfield, CA MSA	945	1.34	0.52	0.85	15.69	13.76	50.32	50.48	33.48	34.92	2.84	4.65	1.60	3.22	2.76
Vallejo-Fairfield, CA MSA	1,785	2.54	0.00	0.00	22.02	14.79	38.85	46.95	39.13	38.26	11.48	0.00	11.49	13.02	9.94
Yuba City, CA MSA	328	0.47	0.00	0.00	17.49	23.78	52.57	57.62	29.94	18.60	3.04	0.00	3.16	3.53	1.86
Non-Metro CA	742	1.06	0.00	0.00	15.79	14.29	61.40	54.58	22.82	31.13	3.75	0.00	4.83	4.30	2.38
State Total	70,294	100.00	1.72	2.15	16.62	17.21	41.11	39.89	40.55	40.74	3.16	2.33	3.31	3.19	3.11

**Table 2. Geographic Distribution of Home Purchase Loans, California (continued)**

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: California										Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Los Angeles-Long Beach-Glendale, CA MD	2,393	30.08	1.91	3.01	15.46	20.35	31.30	31.26	51.33	45.38	5.03	7.14	4.94	5.16	4.96	
Oakland-Fremont-Hayward, CA MD	576	7.24	3.49	5.56	13.07	17.19	43.58	44.79	39.86	32.47	1.78	0.00	2.82	2.44	1.23	
San Diego-Carlsbad-San Marcos, CA MSA	664	8.35	2.30	4.07	14.03	11.60	41.01	37.80	42.66	46.54	5.04	6.06	4.39	4.06	5.74	
<b>Limited Review:</b>																
Bakersfield-Delano, CA MSA	122	1.53	2.10	1.64	23.06	19.67	33.51	33.61	41.33	45.08	1.33	0.00	0.00	1.25	1.80	
Chico, CA MSA	47	0.59	0.38	0.00	14.86	10.64	60.46	68.09	24.30	21.28	3.48	0.00	0.00	3.92	3.57	
Chico-CA MSA	25	0.31	0.00	0.00	23.53	8.00	42.36	44.00	34.11	48.00	4.84	0.00	12.50	4.76	3.03	
Fresno, CA MSA	142	1.79	1.60	0.70	21.71	16.20	35.87	38.03	40.82	45.07	3.26	0.00	0.00	1.53	4.66	
Hanford-Corcoran, CA MSA	19	0.24	0.00	0.00	22.35	5.26	39.08	47.37	38.57	47.37	4.32	0.00	0.00	3.39	6.78	
Madera-Chowchilla, CA MSA	26	0.33	0.00	0.00	11.37	15.38	52.17	42.31	36.46	42.31	1.98	0.00	0.00	1.85	2.50	
Merced, CA MSA	45	0.57	0.00	0.00	17.13	20.00	50.94	24.44	31.94	55.56	0.91	0.00	0.00	2.08	0.00	
Modesto, CA MSA	103	1.29	1.12	1.94	14.63	13.59	53.88	43.69	30.36	40.78	3.47	0.00	0.00	3.33	4.76	
Napa, CA MSA	24	0.30	0.00	0.00	13.85	12.50	60.87	54.17	25.28	33.33	1.36	0.00	0.00	2.04	0.00	
Oxnard-Thousand Oaks-Ventura, CA MSA	266	3.34	1.20	1.88	15.46	12.78	46.06	46.24	37.29	39.10	5.15	0.00	3.81	4.63	6.00	
Redding, CA MSA	26	0.33	0.00	0.00	12.78	19.23	70.92	50.00	16.30	30.77	3.68	0.00	0.00	2.48	9.30	
Riverside-San Bernardino-Ontario, CA MSA	743	9.34	1.49	0.81	21.74	15.75	43.33	45.09	33.44	38.36	3.12	0.00	1.40	2.90	3.91	
Sacramento--Arden-Arcade--Roseville, CA MSA	507	6.37	3.32	3.94	18.33	13.02	42.14	37.48	36.21	45.56	3.72	6.00	1.47	2.86	4.73	
Sacramento--Arden-Arcade--Roseville, CA MSA	122	1.53	0.00	0.00	13.83	17.21	45.09	37.70	41.08	45.08	4.66	0.00	3.85	5.43	4.26	
Santa Ana-CA MSA																
Santa Ana-CA MSA-San Mateo-Redwood City, CA MD	380	4.78	1.54	2.37	12.79	13.95	45.12	49.47	40.55	34.21	1.64	4.76	1.13	1.52	1.87	
San Jose-Sunnyvale-Santa Clara, CA MSA	358	4.50	1.13	1.96	16.54	18.44	47.80	46.37	34.53	33.24	2.39	0.00	1.90	2.65	2.21	
San Luis Obispo-Paso Robles, CA MSA	65	0.82	0.00	0.00	10.27	16.92	75.43	73.85	14.31	9.23	4.72	0.00	2.56	5.47	2.60	
Santa Ana-Anaheim-Irvine, CA MD	652	8.20	1.25	0.92	19.56	16.87	33.56	34.82	45.63	47.39	4.49	0.00	4.21	4.27	4.71	
Santa Barbara-Santa Maria-Goleta, CA MSA	66	0.83	0.97	0.00	17.42	10.61	39.94	34.85	41.68	54.55	1.39	0.00	1.54	1.31	1.42	
Santa Cruz-Watsonville, CA MSA	62	0.78	0.00	0.00	20.21	8.06	40.44	41.94	39.35	50.00	2.93	0.00	0.00	3.45	3.07	
Santa Rosa-Petaluma, CA MSA	88	1.11	0.00	0.00	9.17	11.36	71.27	71.59	19.56	17.05	4.32	0.00	0.00	4.56	4.90	
Stockton, CA MSA	152	1.91	1.80	3.29	19.48	14.47	39.28	34.21	39.43	48.03	5.38	0.00	3.70	6.85	4.98	
Stockton, CA MSA	88	1.11	0.52	1.14	15.69	17.05	50.32	52.27	33.48	29.55	2.11	0.00	0.00	2.22	2.61	
Vallejo-Fairfield, CA MSA	87	1.09	0.00	0.00	22.02	18.39	38.85	37.93	39.13	43.68	4.56	0.00	0.00	6.86	3.68	
Yuba City, CA MSA	18	0.23	0.00	0.00	17.49	16.67	52.57	66.67	29.94	16.67	1.90	0.00	7.14	0.00	2.63	
Non-Metro CA	89	1.12	0.00	0.00	15.79	7.87	61.40	57.30	22.82	34.83	3.87	0.00	3.77	4.44	2.68	
<b>State Total</b>	<b>7,955</b>	<b>100.00</b>	<b>1.72</b>	<b>2.45</b>	<b>16.62</b>	<b>16.54</b>	<b>41.11</b>	<b>39.30</b>	<b>40.55</b>	<b>41.71</b>	<b>3.76</b>	<b>3.45</b>	<b>2.94</b>	<b>3.57</b>	<b>4.08</b>	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

Table 4. Geographic Distribution of Refinance Loans

Geographic Distribution: REFINANCE		Geography: California								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	45,499	25.47	1.91	1.56	15.46	12.39	31.30	26.57	51.33	59.49	6.42	4.54	5.56	6.13	6.67
Oakland-Fremont-Hayward, CA MD	16,424	9.19	3.49	2.45	13.07	8.94	43.58	37.20	39.86	51.41	4.14	2.25	3.54	4.25	4.18
San Diego-Carlsbad-San Marcos, CA MSA	17,317	9.69	2.30	2.31	14.03	9.18	41.01	34.59	42.66	53.92	5.31	4.15	4.38	5.16	5.54
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	1,470	0.82	2.10	1.84	23.06	16.05	33.51	27.89	41.33	54.22	3.09	6.06	1.94	2.37	3.53
Chico, CA MSA	750	0.42	0.38	0.67	14.86	10.27	60.46	52.40	24.30	36.67	4.60	3.13	4.56	4.42	4.83
Chico-Orinda, CA MSA	196	0.11	0.00	0.00	23.53	11.73	42.36	41.33	34.11	46.94	2.38	0.00	1.23	3.35	1.91
Fresno, CA MSA	2,240	1.25	1.60	1.47	21.71	13.17	35.87	25.89	40.82	59.46	5.18	0.00	3.00	3.91	6.01
Hanford-Corcoran, CA MSA	267	0.15	0.00	0.00	22.35	11.61	39.08	29.59	38.57	58.80	5.39	0.00	6.74	5.11	5.28
Madera-Chowchilla, CA MSA	452	0.25	0.00	0.00	11.37	9.07	52.17	46.68	36.46	44.25	6.61	0.00	0.00	6.00	8.07
Merced, CA MSA	494	0.28	0.00	0.00	17.13	21.05	50.94	39.07	31.94	39.88	2.74	0.00	3.52	2.60	2.72
Modesto, CA MSA	1,614	0.90	1.12	0.81	14.63	8.24	53.88	52.85	30.36	38.10	5.03	0.00	2.79	4.52	6.25
Napa, CA MSA	852	0.48	0.00	0.00	13.85	14.08	60.87	56.69	25.28	29.23	4.83	0.00	4.35	4.96	4.81
Oxnard-Thousand Oaks-Ventura, CA MSA	6,095	3.41	1.20	0.61	15.46	8.91	46.06	43.40	37.29	47.09	6.83	3.81	6.67	6.64	7.03
Redding, CA MSA	651	0.36	0.00	0.00	12.78	9.52	70.92	63.44	16.30	27.04	5.36	0.00	5.50	5.28	5.53
Riverside-San Bernardino-Ontario, CA MSA	13,665	7.65	1.49	0.68	21.74	12.74	43.33	39.24	33.44	47.34	4.87	2.55	4.33	4.70	5.14
Sacramento--Arden-Arcade--Roseville, CA MSA	10,037	5.62	3.32	1.80	18.33	9.45	42.14	33.68	36.21	55.08	5.03	2.99	3.65	4.40	5.68
Sacramento, CA MSA	2,142	1.20	0.00	0.00	13.83	8.78	45.09	39.54	41.08	51.68	7.47	0.00	5.93	8.31	7.09
Santa Ana--Irvine--San Mateo-Redwood City, CA MD	12,035	6.74	1.54	2.38	12.79	12.22	45.12	42.38	40.55	43.02	4.59	6.18	4.61	4.73	4.39
San Jose-Sunnyvale-Santa Clara, CA MSA	12,229	6.84	1.13	1.19	16.54	13.88	47.80	47.70	34.53	37.23	3.92	3.41	4.26	4.25	3.51
San Luis Obispo-Paso Robles, CA MSA	2,102	1.18	0.00	0.00	10.27	7.56	75.43	76.12	14.31	16.32	7.59	0.00	6.77	7.65	7.73
Santa Ana-Anaheim-Irvine, CA MD	17,582	9.84	1.25	0.59	19.56	12.79	33.56	29.68	45.63	56.94	5.26	3.71	4.98	5.25	5.34
Santa Barbara-Santa Maria-Goleta, CA MSA	2,128	1.19	0.97	0.85	17.42	12.36	39.94	34.49	41.68	52.30	6.23	6.25	3.91	6.54	6.51
Santa Cruz-Watsonville, CA MSA	2,043	1.14	0.00	0.00	20.21	15.91	40.44	42.78	39.35	41.31	6.40	0.00	6.18	6.67	6.21
Santa Rosa-Petaluma, CA MSA	3,147	1.76	0.00	0.00	9.17	7.09	71.27	69.75	19.56	23.16	5.30	0.00	4.74	5.37	5.23
Stockton, CA MSA	2,122	1.19	1.80	1.41	19.48	9.14	39.28	33.13	39.43	56.31	4.15	2.78	2.48	4.01	4.45
Stockton, CA MSA	1,520	0.85	0.52	0.39	15.69	8.68	50.32	44.93	33.48	45.99	3.48	0.00	1.81	3.01	4.34
Vallejo-Fairfield, CA MSA	1,041	0.58	0.00	0.00	22.02	14.79	38.85	37.75	39.13	47.45	7.52	0.00	6.22	7.65	7.70
Yuba City, CA MSA	471	0.26	0.00	0.00	17.49	7.43	52.57	50.53	29.94	42.04	5.98	0.00	2.51	6.07	7.25
Non-Metro CA	2,084	1.17	0.00	0.00	15.79	8.73	61.40	52.50	22.82	38.77	5.14	0.00	5.61	4.83	5.50
State Total	178,669	100.00	1.72	1.39	16.62	11.37	41.11	36.26	40.55	50.98	5.24	4.05	4.65	5.09	5.45

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

**JPMorgan Chase Bank, N.A.**

**Charter Number: 8**

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



Table 5. Geographic Distribution of Multi-Family (MF) Loans

Geographic Distribution: MULTI-FAMILY		Geography: California								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of MF Units **	% Bank Loans	% of MF Units **	% Bank Loans	% of MF Units **	% Bank Loans	% of MF Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	12,787	54.09	12.96	11.35	31.74	37.51	28.34	28.38	26.96	22.76	5.48	2.58	3.58	6.39	8.30
Oakland-Fremont-Hayward, CA MD	1,516	6.41	13.31	14.64	27.95	41.69	45.36	35.22	13.38	8.44	7.69	12.00	3.61	11.11	8.33
San Diego-Carlsbad-San Marcos, CA MSA	2,117	8.95	11.77	20.45	32.61	39.06	37.33	32.50	18.29	7.98	8.27	5.49	8.96	10.42	5.56
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	119	0.50	5.58	9.24	33.58	37.82	31.60	39.50	29.24	13.45	5.88	0.00	14.29	0.00	0.00
Chico, CA MSA	51	0.22	8.41	17.65	34.73	37.25	34.21	31.37	22.65	13.73	0.00	0.00	0.00	0.00	0.00
Chico-Grass Valley, CA MSA	26	0.11	0.00	0.00	38.97	34.62	27.45	34.62	33.58	30.77	0.00	0.00	0.00	0.00	0.00
Fresno, CA MSA	228	0.96	6.51	11.40	38.38	45.18	39.03	37.28	16.08	6.14	7.14	0.00	10.00	10.00	0.00
Hanford-Corcoran, CA MSA	23	0.10	0.00	0.00	30.00	21.74	38.19	34.78	31.80	43.48	0.00	0.00	0.00	0.00	0.00
Madera-Chowchilla, CA MSA	13	0.05	0.00	0.00	47.62	46.15	39.87	53.85	12.50	0.00	0.00	0.00	0.00	0.00	0.00
Merced, CA MSA	32	0.14	0.00	0.00	39.39	53.13	42.53	40.63	18.09	6.25	0.00	0.00	0.00	0.00	0.00
Modesto, CA MSA	51	0.22	3.38	1.96	26.24	33.33	49.18	45.10	21.20	19.61	5.26	0.00	0.00	6.67	0.00
Napa, CA MSA	32	0.14	0.00	0.00	24.02	37.50	72.18	62.50	3.80	0.00	0.00	0.00	0.00	0.00	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	195	0.82	3.57	4.10	34.60	54.87	47.43	31.79	14.41	9.23	2.13	0.00	4.55	0.00	0.00
Redding, CA MSA	46	0.19	0.00	0.00	44.43	41.30	47.48	54.35	8.09	4.35	12.50	0.00	0.00	33.33	0.00
Riverside-San Bernardino-Ontario, CA MSA	518	2.19	7.73	10.23	38.68	39.58	37.84	35.71	15.76	14.48	2.99	0.00	1.67	6.38	0.00
Sacramento--Arden-Arcade--Roseville, CA MSA	759	3.21	10.57	14.62	36.09	42.29	35.54	31.62	17.80	11.46	15.79	5.56	4.35	31.82	23.08
Salinas, CA MSA	148	0.63	0.00	0.00	28.29	47.97	58.50	39.86	13.21	12.16	11.76	0.00	0.00	20.00	0.00
San Francisco-San Mateo-Redwood City, CA MD	2,115	8.95	19.98	10.12	23.42	27.00	31.54	36.83	25.05	26.05	12.14	10.34	12.99	7.69	18.57
San Jose-Sunnyvale-Santa Clara, CA MSA	838	3.54	6.94	8.59	26.10	30.91	53.65	46.18	13.30	14.32	9.17	0.00	4.76	16.67	10.53
San Luis Obispo-Paso Robles, CA MSA	50	0.21	0.00	0.00	34.31	18.00	64.12	76.00	1.56	6.00	0.00	0.00	0.00	0.00	0.00
Santa Ana-Anaheim-Irvine, CA MD	1,238	5.24	6.27	11.55	41.07	52.34	33.61	23.59	19.05	12.52	4.90	2.56	3.76	6.67	11.11
Santa Barbara-Santa Maria-Goleta, CA MSA	205	0.87	12.99	12.68	41.94	41.95	28.08	28.29	16.99	17.07	8.00	25.00	11.11	0.00	7.69
Santa Cruz-Watsonville, CA MSA	102	0.43	0.00	0.00	43.78	39.22	44.77	51.96	11.45	8.82	12.50	0.00	0.00	0.00	100.00
Santa Rosa-Petaluma, CA MSA	101	0.43	0.00	0.00	29.86	31.68	65.54	65.35	4.60	2.97	6.25	0.00	0.00	10.00	0.00
Stockton, CA MSA	125	0.53	22.11	20.00	26.33	30.40	37.30	39.20	14.27	10.40	0.00	0.00	0.00	0.00	0.00
Vallejo-Fairfield, CA MSA	81	0.34	6.21	6.17	35.41	61.73	37.98	23.46	20.40	8.64	0.00	0.00	0.00	0.00	0.00
Yuba City, CA MSA	46	0.19	0.00	0.00	40.02	32.61	30.92	34.78	29.06	32.61	12.50	0.00	0.00	33.33	0.00
Yuba City, CA MSA	39	0.16	0.00	0.00	49.32	46.15	37.49	48.72	13.19	5.13	0.00	0.00	0.00	0.00	0.00
Non-Metro CA	40	0.17	0.00	0.00	42.31	47.50	52.39	47.50	5.30	5.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>23,641</b>	<b>100.00</b>	<b>11.34</b>	<b>11.89</b>	<b>32.32</b>	<b>38.06</b>	<b>35.06</b>	<b>31.49</b>	<b>21.29</b>	<b>18.57</b>	<b>6.27</b>	<b>3.87</b>	<b>4.45</b>	<b>7.58</b>	<b>8.82</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: California						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	8,459	35.01	7.11	7.02	19.83	20.87	26.45	27.19	45.76	44.92	0.19	0.21	0.20	0.23	0.17
Oakland-Fremont-Hayward, CA MD	1,352	5.60	9.49	9.25	15.84	17.46	38.96	41.05	35.58	32.25	0.10	0.18	0.06	0.10	0.09
San Diego-Carlsbad-San Marcos, CA MSA	2,770	11.46	4.51	3.94	19.89	20.72	36.99	37.29	38.56	38.05	0.22	0.22	0.27	0.25	0.17
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	424	1.75	2.51	3.77	26.57	26.18	28.75	25.94	42.16	44.10	0.21	0.00	0.37	0.11	0.19
Chico-CA MSA	82	0.34	0.40	1.22	26.34	26.83	46.80	48.78	26.46	23.17	0.11	5.56	0.10	0.08	0.11
Chico-CA MSA	52	0.22	0.00	0.00	33.17	19.23	37.71	50.00	29.12	30.77	0.07	0.00	0.00	0.00	0.21
Fresno, CA MSA	282	1.17	5.85	3.90	25.57	20.92	32.88	34.75	35.57	40.43	0.23	0.29	0.37	0.17	0.19
Hanford-Corcoran, CA MSA	19	0.08	0.00	0.00	36.45	52.63	31.12	15.79	32.28	31.58	0.15	0.00	0.24	0.00	0.22
Madera-Chowchilla, CA MSA	48	0.20	0.00	0.00	14.62	8.33	51.99	60.42	33.39	31.25	0.04	0.00	0.00	0.08	0.00
Merced, CA MSA	30	0.12	0.00	0.00	28.13	30.00	46.71	33.33	25.16	36.67	0.00	0.00	0.00	0.00	0.00
Modesto, CA MSA	161	0.67	7.09	3.73	15.40	16.77	50.88	46.58	26.63	32.92	0.10	0.00	0.24	0.00	0.20
Napa, CA MSA	55	0.23	0.00	0.00	24.45	21.82	56.61	56.36	18.94	21.82	0.09	0.00	0.00	0.16	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	740	3.06	3.54	2.84	17.20	16.08	49.37	52.16	29.89	28.92	0.23	0.56	0.18	0.23	0.22
Redding, CA MSA	38	0.16	0.00	0.00	23.51	28.95	63.56	63.16	12.94	7.89	0.15	0.00	0.16	0.18	0.00
Riverside-San Bernardino-Ontario, CA MSA	1,826	7.56	3.19	2.41	26.39	25.25	41.17	39.10	29.18	33.24	0.23	0.15	0.25	0.21	0.23
Sacramento--Arden-Arcade--Roseville, CA MSA	926	3.83	6.39	6.91	20.50	21.17	38.59	32.94	34.52	38.98	0.13	0.18	0.16	0.11	0.14
Sacramento--Arden-Arcade--Roseville, CA MSA	355	1.47	0.00	0.00	19.94	21.13	44.71	42.25	35.35	36.62	0.20	0.00	0.47	0.13	0.17
San Francisco-San Mateo-Redwood City, CA MD	1,338	5.54	13.99	12.86	17.68	18.31	35.59	38.49	32.65	30.34	0.12	0.23	0.13	0.10	0.09
San Jose-Sunnyvale-Santa Clara, CA MSA	1,084	4.49	2.81	3.60	22.84	23.52	43.44	49.54	30.91	23.34	0.13	0.18	0.14	0.13	0.11
San Luis Obispo-Paso Robles, CA MSA	191	0.79	0.00	0.00	19.70	16.23	66.81	70.68	13.49	13.09	0.17	0.00	0.00	0.20	0.20
Santa Ana-Anaheim-Irvine, CA MD	2,716	11.24	2.79	2.47	27.50	27.54	34.30	34.50	34.67	35.49	0.23	0.39	0.22	0.25	0.20
Santa Barbara-Santa Maria-Goleta, CA MSA	197	0.82	2.60	2.54	33.53	42.13	33.37	27.41	30.50	27.92	0.23	2.00	0.32	0.08	0.22
Santa Cruz-Watsonville, CA MSA	148	0.61	0.00	0.00	21.51	25.68	46.57	47.30	31.92	27.03	0.10	0.00	0.18	0.12	0.05
Santa Rosa-Petaluma, CA MSA	310	1.28	0.00	0.00	15.10	13.55	69.91	67.42	14.99	19.03	0.12	0.00	0.17	0.05	0.35
Stockton, CA MSA	186	0.77	8.15	5.91	20.80	17.74	36.19	36.56	34.87	39.78	0.04	0.00	0.07	0.07	0.00
Stockton, CA MSA	78	0.32	2.56	0.00	23.28	23.08	45.46	43.59	28.66	33.33	0.09	0.00	0.10	0.11	0.05
Vallejo-Fairfield, CA MSA	69	0.29	0.00	0.00	28.67	26.09	34.88	37.68	36.42	36.23	0.21	0.00	0.36	0.15	0.15
Yuba City, CA MSA	51	0.21	0.00	0.00	31.47	27.45	44.27	43.14	24.25	29.41	0.00	0.00	0.00	0.00	0.00
Non-Metro CA	174	0.72	0.00	0.00	22.68	22.99	57.39	52.30	19.94	24.71	0.06	0.00	0.13	0.05	0.05
State Total	24,161	100.00	5.54	5.32	21.51	21.80	36.24	35.54	36.35	37.35	0.17	0.22	0.20	0.17	0.16

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

**JPMorgan Chase Bank, N.A.**

**Charter Number: 8**

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: California						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	2	9.09	3.35	0.00	15.16	0.00	31.74	0.00	49.26	100.00	0.00	0.00	0.00	0.00	0.00
Oakland-Fremont-Hayward, CA MD	0	0.00	5.24	0.00	15.62	0.00	38.87	0.00	40.27	0.00	0.00	0.00	0.00	0.00	0.00
San Diego-Carlsbad-San Marcos, CA MSA	5	22.73	3.43	20.00	17.63	0.00	41.30	40.00	37.62	40.00	0.31	12.50	0.00	0.00	0.00
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	2	9.09	1.49	0.00	33.24	50.00	34.12	50.00	31.15	0.00	0.54	0.00	0.00	1.75	0.00
Chico-CA MSA	0	0.00	0.10	0.00	9.92	0.00	50.00	0.00	39.98	0.00	0.00	0.00	0.00	0.00	0.00
Chico-CA MSA	3	13.64	0.00	0.00	16.29	66.67	47.10	33.33	36.61	0.00	1.52	0.00	16.67	0.00	0.00
Fresno, CA MSA	2	9.09	1.08	0.00	25.22	0.00	45.25	50.00	28.42	50.00	0.23	0.00	0.00	0.50	0.00
Hanford-Corcoran, CA MSA	0	0.00	0.00	0.00	17.17	0.00	63.22	0.00	19.45	0.00	0.00	0.00	0.00	0.00	0.00
Madera-Chowchilla, CA MSA	0	0.00	0.00	0.00	1.95	0.00	81.06	0.00	16.99	0.00	0.00	0.00	0.00	0.00	0.00
Merced, CA MSA	0	0.00	0.00	0.00	13.31	0.00	73.90	0.00	12.79	0.00	0.00	0.00	0.00	0.00	0.00
Modesto, CA MSA	0	0.00	1.24	0.00	12.58	0.00	63.65	0.00	22.53	0.00	0.00	0.00	0.00	0.00	0.00
Napa, CA MSA	0	0.00	0.00	0.00	13.46	0.00	47.11	0.00	39.43	0.00	0.00	0.00	0.00	0.00	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	2	9.09	3.81	0.00	21.94	0.00	54.33	0.00	19.91	100.00	0.80	0.00	0.00	0.00	2.63
Redding, CA MSA	0	0.00	0.00	0.00	14.50	0.00	71.56	0.00	13.93	0.00	0.00	0.00	0.00	0.00	0.00
Riverside-San Bernardino-Ontario, CA MSA	1	4.55	1.91	0.00	25.53	100.00	42.16	0.00	30.41	0.00	0.38	0.00	1.69	0.00	0.00
Sacramento--Arden-Arcade--Roseville, CA MSA	0	0.00	3.11	0.00	17.77	0.00	47.69	0.00	31.44	0.00	0.00	0.00	0.00	0.00	0.00
Sacramento--Arden-Arcade--Roseville, CA MSA	1	4.55	0.00	0.00	18.07	0.00	51.71	100.00	30.21	0.00	0.00	0.00	0.00	0.00	0.00
San Francisco-San Mateo-Redwood City, CA MD	0	0.00	5.89	0.00	14.09	0.00	45.07	0.00	34.95	0.00	0.00	0.00	0.00	0.00	0.00
San Jose-Sunnyvale-Santa Clara, CA MSA	0	0.00	1.82	0.00	29.70	0.00	43.48	0.00	25.00	0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo-Paso Robles, CA MSA	0	0.00	0.00	0.00	11.43	0.00	74.11	0.00	14.46	0.00	0.00	0.00	0.00	0.00	0.00
Santa Ana-Anaheim-Irvine, CA MD	0	0.00	2.73	0.00	27.03	0.00	33.23	0.00	36.86	0.00	0.00	0.00	0.00	0.00	0.00
Santa Barbara-Santa Maria-Goleta, CA MSA	1	4.55	1.95	0.00	21.63	0.00	33.15	0.00	43.27	100.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz-Watsonville, CA MSA	0	0.00	0.00	0.00	22.07	0.00	41.13	0.00	36.79	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa-Petaluma, CA MSA	1	4.55	0.00	0.00	5.34	0.00	81.63	100.00	13.03	0.00	0.00	0.00	0.00	0.00	0.00
Stockton, CA MSA	0	0.00	1.19	0.00	9.76	0.00	53.05	0.00	36.01	0.00	0.00	0.00	0.00	0.00	0.00
Vallejo-Fairfield, CA MSA	1	4.55	0.00	0.00	24.36	0.00	43.26	0.00	32.38	100.00	0.29	0.00	0.00	0.00	0.87
Visalia-Tulare-Orange, CA MSA	1	4.55	0.00	0.00	6.30	0.00	62.98	0.00	30.72	100.00	0.00	0.00	0.00	0.00	0.00
Non-Metro CA	0	0.00	0.00	0.00	18.42	0.00	64.00	0.00	17.58	0.00	0.00	0.00	0.00	0.00	0.00
State Total	22	100.00	2.01	4.55	18.53	18.18	47.34	31.82	32.05	45.45	0.13	1.45	0.24	0.07	0.11

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

**JPMorgan Chase Bank, N.A.**

**Charter Number: 8**

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE		Geography: California								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	13,582	19.30	23.87	3.62	16.49	11.33	17.40	22.19	42.24	62.86	3.44	4.11	3.44	3.10	3.55
Oakland-Fremont-Hayward, CA MD	5,701	8.10	20.97	7.22	17.47	17.74	21.18	24.42	40.38	50.62	2.88	2.03	2.34	3.10	3.24
San Diego-Carlsbad-San Marcos, CA MSA	5,784	8.22	21.02	3.18	17.91	16.02	20.09	26.85	40.98	53.95	2.97	2.29	2.58	3.16	3.05
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	1,605	2.28	23.46	6.73	16.67	22.40	18.13	32.02	41.75	38.85	3.00	2.91	3.54	3.30	2.56
Chico, CA MSA	304	0.43	21.91	5.20	17.06	15.61	21.06	30.64	39.97	48.55	2.75	2.94	1.76	2.73	3.11
Chico-Parsons, CA MSA	472	0.67	23.24	4.76	17.60	26.35	17.11	38.10	42.05	30.79	3.76	3.51	4.99	4.76	2.71
Fresno, CA MSA	2,039	2.90	22.80	5.50	17.05	22.80	18.53	29.69	41.63	42.01	4.29	3.69	4.72	4.73	3.90
Hanford-Corcoran, CA MSA	367	0.52	20.55	9.62	18.31	24.40	19.92	30.93	41.22	35.05	9.12	13.08	10.56	7.93	8.75
Madera-Chowchilla, CA MSA	436	0.62	22.09	11.11	16.65	34.81	21.11	28.89	40.14	25.19	5.04	5.86	6.06	5.69	3.68
Merced, CA MSA	731	1.04	20.72	10.63	18.32	28.96	19.88	28.96	41.08	31.45	2.93	3.42	3.36	3.13	2.37
Modesto, CA MSA	1,300	1.85	21.74	11.39	17.27	28.18	20.71	27.85	40.28	32.58	2.98	2.79	2.69	3.23	3.07
Napa, CA MSA	241	0.34	18.55	0.88	19.66	15.79	22.34	21.05	39.45	62.28	2.05	1.02	2.59	0.87	2.59
Oxnard-Thousand Oaks-Ventura, CA MSA	1,455	2.07	19.55	3.22	18.43	17.47	22.09	26.89	39.92	52.42	3.38	1.45	3.01	3.47	3.74
Redding, CA MSA	369	0.52	20.36	3.65	18.02	28.31	21.24	30.14	40.38	37.90	2.50	0.90	2.31	2.93	2.51
Riverside-San Bernardino-Ontario, CA MSA	9,613	13.66	21.73	9.29	17.48	24.43	20.23	27.31	40.56	38.97	3.06	3.30	3.30	2.79	3.05
Sacramento--Arden-Arcade--Roseville, CA MSA	5,060	7.19	20.59	9.36	18.32	22.68	21.00	25.27	40.09	42.69	3.15	2.94	2.80	3.03	3.53
Sacramento--Arden-Arcade--Roseville, CA MSA	1,116	1.59	19.70	6.53	18.38	27.84	21.52	29.70	40.40	35.93	3.28	1.33	3.25	3.38	3.57
San Francisco-San Mateo-Redwood City, CA MD	3,211	4.56	21.33	2.55	17.59	11.00	19.98	21.36	41.11	65.09	2.13	2.44	2.22	2.00	2.15
San Jose-Sunnyvale-Santa Clara, CA MSA	3,510	4.99	20.54	6.89	18.11	18.36	21.70	27.45	39.66	47.29	2.88	2.96	2.96	2.95	2.79
San Luis Obispo-Paso Robles, CA MSA	745	1.06	18.57	1.10	18.88	18.32	22.65	29.80	39.90	50.77	5.62	4.60	5.01	6.51	5.42
Santa Ana-Anaheim-Irvine, CA MD	5,137	7.30	20.69	4.11	17.97	17.79	20.68	24.64	40.65	53.46	2.83	2.99	3.08	2.52	2.90
Santa Barbara-Santa Maria-Goleta, CA MSA	693	0.98	20.00	4.70	18.61	18.78	20.45	20.72	40.95	55.80	4.13	5.26	4.44	3.60	4.17
Santa Cruz-Watsonville, CA MSA	653	0.93	19.96	2.51	17.98	15.60	21.23	24.23	40.83	57.66	6.56	4.84	5.27	7.76	6.69
Santa Rosa-Petaluma, CA MSA	845	1.20	17.73	6.11	18.87	20.63	24.32	23.16	39.08	50.11	2.38	3.17	2.25	2.57	2.20
Stockton, CA MSA	1,620	2.30	22.77	13.73	16.48	23.76	19.80	27.95	40.95	34.57	2.80	3.67	2.57	2.75	2.73
Vallejo-Fairfield, CA MSA	945	1.34	19.26	4.45	18.51	19.87	23.45	32.27	38.79	43.40	2.99	0.64	1.89	3.47	4.28
Yuba City, CA MSA	328	0.47	20.84	13.04	18.18	27.39	20.53	30.00	40.46	29.57	2.64	5.43	2.96	2.40	1.99
Non-Metro CA	742	1.05	21.42	4.53	17.81	17.18	20.84	34.13	39.94	44.15	3.68	3.65	4.03	6.10	2.65
State Total	70,389	100.00	21.80	6.38	17.44	19.31	19.77	26.10	40.99	48.22	3.24	3.10	3.19	3.21	3.30

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 41.7% of loans originated and purchased by bank.



Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT		Geography: California								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	2,394	30.09	23.87	4.38	16.49	12.39	17.40	24.77	42.24	58.46	5.31	8.65	7.46	6.87	4.34
Oakland-Fremont-Hayward, CA MD	576	7.24	20.97	0.87	17.47	18.26	21.18	30.43	40.38	50.43	1.92	0.54	3.00	2.44	1.51
San Diego-Carlsbad-San Marcos, CA MSA	664	8.35	21.02	7.76	17.91	18.72	20.09	21.00	40.98	52.51	5.30	8.40	7.60	5.20	4.56
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	122	1.53	23.46	0.00	16.67	20.00	18.13	6.67	41.75	73.33	1.59	0.00	2.27	0.00	2.16
Chico, CA MSA	47	0.59	21.91	0.00	17.06	0.00	21.06	33.33	39.97	66.67	3.76	0.00	0.00	5.36	3.88
Chico-Grass Valley, CA MSA	25	0.31	23.24	25.00	17.60	0.00	17.11	25.00	42.05	50.00	5.77	0.00	0.00	11.11	5.41
Fresno, CA MSA	142	1.78	22.80	5.56	17.05	8.33	18.53	16.67	41.63	69.44	3.54	4.35	3.23	3.48	3.56
Hanford-Corcoran, CA MSA	19	0.24	20.55	12.50	18.31	12.50	19.92	25.00	41.22	50.00	4.69	12.50	4.76	2.94	4.62
Madera-Chowchilla, CA MSA	26	0.33	22.09	0.00	16.65	50.00	21.11	50.00	40.14	0.00	2.30	0.00	6.25	5.00	0.00
Merced, CA MSA	45	0.57	20.72	50.00	18.32	0.00	19.88	0.00	41.08	50.00	1.05	0.00	0.00	0.00	1.59
Modesto, CA MSA	103	1.29	21.74	8.33	17.27	8.33	20.71	16.67	40.28	66.67	4.37	0.00	4.00	1.89	6.15
Napa, CA MSA	24	0.30	18.55	25.00	19.66	0.00	22.34	25.00	39.45	50.00	1.45	12.50	0.00	2.44	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	266	3.34	19.55	7.89	18.43	19.74	22.09	23.68	39.92	48.68	5.53	7.69	7.74	4.05	5.33
Redding, CA MSA	26	0.33	20.36	0.00	18.02	27.27	21.24	36.36	40.38	36.36	3.93	0.00	6.25	2.00	4.40
Riverside-San Bernardino-Ontario, CA MSA	743	9.34	21.73	7.53	17.48	15.75	20.23	26.03	40.56	50.68	3.44	6.13	4.48	3.67	2.78
Sacramento--Arden-Arcade--Roseville, CA MSA	507	6.37	20.59	8.39	18.32	14.19	21.00	24.52	40.09	52.90	4.05	6.12	3.31	3.69	4.17
Sacramento--Arden-Arcade--Roseville, CA MSA	122	1.53	19.70	8.00	18.38	4.00	21.52	12.00	40.40	76.00	5.03	0.00	4.00	5.77	5.24
Sacramento--Arden-Arcade--Roseville, CA MSA	380	4.78	21.33	10.84	17.59	16.87	19.98	30.12	41.11	42.17	1.71	0.75	2.11	2.57	1.24
San Jose-Sunnyvale-Santa Clara, CA MSA	358	4.50	20.54	10.20	18.11	15.31	21.70	26.53	39.66	47.96	2.47	3.14	2.53	2.18	2.51
San Luis Obispo-Paso Robles, CA MSA	65	0.82	18.57	3.85	18.88	19.23	22.65	26.92	39.90	50.00	4.95	5.00	4.76	4.12	5.38
Santa Ana-Anaheim-Irvine, CA MD	652	8.20	20.69	7.84	17.97	14.51	20.68	27.45	40.65	50.20	4.72	5.53	4.87	5.10	4.37
Santa Barbara-Santa Maria-Goleta, CA MSA	66	0.83	20.00	6.67	18.61	6.67	20.45	13.33	40.95	73.33	1.52	0.00	0.00	1.05	2.14
Santa Cruz-Watsonville, CA MSA	62	0.78	19.96	5.26	17.98	21.05	21.23	31.58	40.83	42.11	3.13	7.69	3.57	4.76	1.80
Santa Rosa-Petaluma, CA MSA	88	1.11	17.73	13.16	18.87	26.32	24.32	15.79	39.08	44.74	4.62	6.25	8.74	3.33	3.44
Stockton, CA MSA	152	1.91	22.77	6.67	16.48	13.33	19.80	20.00	40.95	60.00	6.73	11.11	6.12	5.68	6.98
Stockton, CA MSA	88	1.11	19.26	0.00	18.51	25.00	23.45	31.25	38.79	43.75	2.52	0.00	3.33	3.03	2.47
Vallejo-Fairfield, CA MSA	87	1.09	22.23	15.38	17.27	7.69	19.30	15.38	41.20	61.54	4.98	8.33	7.14	2.22	5.13
Yuba City, CA MSA	18	0.23	20.84	0.00	18.18	33.33	20.53	33.33	40.46	33.33	2.06	0.00	6.67	0.00	1.69
Non-Metro CA	89	1.12	21.42	7.14	17.81	10.71	20.84	25.00	39.94	57.14	4.27	6.25	2.90	4.59	4.38
State Total	7,956	100.00	21.80	6.64	17.44	14.78	19.77	24.63	40.99	53.95	4.02	5.06	4.78	4.30	3.63

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* 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.

**JPMorgan Chase Bank, N.A.**

**Charter Number: 8**

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 73.0% of loans originated and purchased by bank.

Table 10. Borrower Distribution of Refinance Loans

Borrower Distribution: REFINANCE		Geography: California								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Los Angeles-Long Beach-Glendale, CA MD	45,570	25.50	23.87	4.66	16.49	10.49	17.40	18.50	42.24	66.35	7.37	7.57	9.55	7.88	7.00
Oakland-Fremont-Hayward, CA MD	16,424	9.19	20.97	6.67	17.47	13.64	21.18	22.48	40.38	57.20	4.83	5.99	5.83	5.07	4.46
San Diego-Carlsbad-San Marcos, CA MSA	17,317	9.69	21.02	5.99	17.91	12.54	20.09	21.81	40.98	59.65	6.11	7.00	7.12	6.64	5.70
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	1,470	0.82	23.46	4.92	16.67	11.53	18.13	18.98	41.75	64.58	4.35	4.04	5.33	3.59	4.46
Chico, CA MSA	750	0.42	21.91	6.69	17.06	11.30	21.06	20.92	39.97	61.09	5.23	7.18	4.60	4.98	5.31
Chico-Grass Valley, CA MSA	196	0.11	23.24	1.67	17.60	3.33	17.11	21.67	42.05	73.33	3.47	3.70	1.59	3.57	3.77
Fresno, CA MSA	2,240	1.25	22.80	3.09	17.05	9.97	18.53	19.07	41.63	67.87	6.43	2.34	6.42	7.19	6.46
Hanford-Corcoran, CA MSA	267	0.15	20.55	2.52	18.31	13.21	19.92	24.53	41.22	59.75	6.73	5.13	8.76	8.97	5.73
Madera-Chowchilla, CA MSA	452	0.25	22.09	6.60	16.65	13.20	21.11	22.34	40.14	57.87	8.32	7.69	8.18	10.26	7.62
Merced, CA MSA	494	0.28	20.72	7.94	18.32	7.94	19.88	20.63	41.08	63.49	4.68	7.41	1.80	4.12	5.07
Modesto, CA MSA	1,614	0.90	21.74	7.60	17.27	17.40	20.71	22.94	40.28	52.06	7.51	9.09	10.24	6.84	6.92
Napa, CA MSA	852	0.48	18.55	7.91	19.66	16.60	22.34	24.31	39.45	51.19	5.58	4.46	7.06	6.77	4.79
Oxnard-Thousand Oaks-Ventura, CA MSA	6,095	3.41	19.55	7.33	18.43	15.15	22.09	27.67	39.92	49.85	7.92	8.30	8.60	8.05	7.62
Redding, CA MSA	651	0.36	20.36	4.28	18.02	14.46	21.24	25.46	40.38	55.80	6.37	6.38	7.30	6.04	6.27
Riverside-San Bernardino-Ontario, CA MSA	13,665	7.65	21.73	7.24	17.48	14.41	20.23	22.71	40.56	55.64	6.60	7.92	8.03	6.94	6.04
Sacramento--Arden-Arcade--Roseville, CA MSA	10,037	5.62	20.59	6.29	18.32	14.01	21.00	24.46	40.09	55.24	6.07	6.89	6.02	6.36	5.88
Sacramento--Arden-Arcade--Roseville, CA MSA	2,142	1.20	19.70	6.30	18.38	10.50	21.52	17.67	40.40	65.53	9.32	11.38	13.23	11.09	8.34
San Francisco-San Mateo-Redwood City, CA MD	12,035	6.73	21.33	7.89	17.59	15.14	19.98	21.51	41.11	55.46	5.02	7.51	6.41	5.61	4.39
San Jose-Sunnyvale-Santa Clara, CA MSA	12,229	6.84	20.54	7.54	18.11	14.21	21.70	23.92	39.66	54.33	4.28	6.58	5.53	4.43	3.84
San Luis Obispo-Paso Robles, CA MSA	2,102	1.18	18.57	5.00	18.88	11.95	22.65	24.17	39.90	58.88	8.32	10.03	8.46	7.81	8.41
Santa Ana-Anaheim-Irvine, CA MD	17,582	9.84	20.69	6.93	17.97	14.22	20.68	24.91	40.65	53.94	5.92	6.58	6.53	6.16	5.60
Santa Barbara-Santa Maria-Goleta, CA MSA	2,128	1.19	20.00	4.21	18.61	9.34	20.45	21.97	40.95	64.48	7.07	4.33	6.85	8.54	6.81
Santa Cruz-Watsonville, CA MSA	2,043	1.14	19.96	7.84	17.98	16.77	21.23	24.14	40.83	51.25	7.05	11.33	9.24	8.11	5.97
Santa Rosa-Petaluma, CA MSA	3,147	1.76	17.73	8.02	18.87	19.35	24.32	24.54	39.08	48.10	5.92	8.62	7.14	5.85	5.24
Stockton, CA MSA	2,122	1.19	22.77	4.10	16.48	13.63	19.80	25.33	40.95	56.94	6.32	4.09	8.47	7.29	5.67
Stockton, CA MSA	1,520	0.85	19.26	10.29	18.51	16.76	23.45	23.68	38.79	49.26	4.80	7.23	5.44	4.20	4.59
Vallejo-Fairfield, CA MSA	1,041	0.58	22.23	3.19	17.27	10.09	19.30	18.76	41.20	67.96	8.21	4.31	7.37	8.23	8.57
Yuba City, CA MSA	471	0.26	20.84	7.32	18.18	14.98	20.53	28.57	40.46	49.13	8.10	18.31	11.43	9.70	5.91
Non-Metro CA	2,084	1.17	21.42	5.56	17.81	11.65	20.84	21.44	39.94	61.35	5.84	4.96	6.67	6.78	5.45
State Total	178,740	100.00	21.80	6.20	17.44	13.05	19.77	22.02	40.99	58.72	6.10	7.06	7.14	6.39	5.75

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 40.6% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: California		Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses **	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Los Angeles-Long Beach-Glendale, CA MD	8,535	35.19	77.84	75.35	92.40	2.18	5.42	0.19	0.16
Oakland-Fremont-Hayward, CA MD	1,352	5.57	78.86	75.59	89.87	3.40	6.73	0.10	0.04
San Diego-Carlsbad-San Marcos, CA MSA	2,770	11.42	77.87	72.49	93.79	2.31	3.90	0.22	0.16
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	424	1.75	78.60	67.69	95.28	2.59	2.12	0.21	0.22
Chico-CA MSA	82	0.34	80.05	70.73	96.34	1.22	2.44	0.11	0.14
Chico-CA MSA	52	0.21	70.74	63.46	98.08	1.92	0.00	0.07	0.00
Fresno, CA MSA	282	1.16	76.49	63.12	98.23	0.71	1.06	0.23	0.08
Hanford-Corcoran, CA MSA	19	0.08	74.97	68.42	100.00	0.00	0.00	0.15	0.00
Madera-Chowchilla, CA MSA	48	0.20	80.17	83.33	97.92	0.00	2.08	0.04	0.00
Merced, CA MSA	30	0.12	76.18	70.00	100.00	0.00	0.00	0.00	0.00
Modesto, CA MSA	161	0.66	78.64	86.34	97.52	1.24	1.24	0.10	0.14
Napa, CA MSA	55	0.23	80.06	74.55	94.55	0.00	5.45	0.09	0.09
Oxnard-Thousand Oaks-Ventura, CA MSA	740	3.05	79.71	74.05	94.19	1.89	3.92	0.23	0.16
Redding, CA MSA	38	0.16	80.34	76.32	97.37	0.00	2.63	0.15	0.00
Riverside-San Bernardino-Ontario, CA MSA	1,826	7.53	79.25	71.19	94.52	1.92	3.56	0.23	0.17
Sacramento--Arden-Arcade--Roseville, CA MSA	926	3.82	76.43	71.27	89.85	3.56	6.59	0.13	0.07
Sacramento--Arden-Arcade--Roseville, CA MSA	355	1.46	77.69	82.54	98.03	0.56	1.41	0.20	0.20
San Francisco-San Mateo-Redwood City, CA MD	1,339	5.52	77.83	75.06	90.44	2.91	6.65	0.12	0.08
San Jose-Sunnyvale-Santa Clara, CA MSA	1,084	4.47	77.64	70.39	88.75	3.14	8.12	0.13	0.07
San Luis Obispo-Paso Robles, CA MSA	191	0.79	81.83	71.73	98.95	0.52	0.52	0.17	0.24
Santa Ana-Anaheim-Irvine, CA MD	2,731	11.26	78.12	70.08	92.09	2.93	4.98	0.23	0.17
Santa Barbara-Santa Maria-Goleta, CA MSA	197	0.81	78.14	70.56	96.45	0.51	3.05	0.23	0.00
Santa Cruz-Watsonville, CA MSA	148	0.61	82.80	72.97	93.92	1.35	4.73	0.10	0.00
Santa Rosa-Petaluma, CA MSA	310	1.28	80.62	76.77	95.81	0.65	3.55	0.12	0.11
Stockton, CA MSA	186	0.77	76.89	77.96	97.85	0.54	1.61	0.04	0.04
Stockton, CA MSA	78	0.32	80.55	80.77	91.03	1.28	7.69	0.09	0.00
Vallejo-Fairfield, CA MSA	69	0.28	77.18	56.52	94.20	2.90	2.90	0.21	0.07
Yuba City, CA MSA	51	0.21	78.10	86.27	98.04	1.96	0.00	0.00	0.00
Non-Metro CA	174	0.72	79.67	80.46	94.25	3.45	2.30	0.06	0.00
<b>State Total</b>	<b>24,253</b>	<b>100.00</b>	<b>78.18</b>	<b>73.54</b>	<b>92.73</b>	<b>2.34</b>	<b>4.93</b>	<b>0.17</b>	<b>0.12</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 12.04% of small loans to businesses originated and purchased by the bank.

Table 12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS		Geography: California			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Los Angeles-Long Beach-Glendale, CA MD	2	9.09	93.77	0.00	100.00	0.00	0.00	0.00	0.00
Oakland-Fremont-Hayward, CA MD	0	0.00	93.50	0.00	0.00	0.00	0.00	0.00	0.00
San Diego-Carlsbad-San Marcos, CA MSA	5	22.73	93.17	60.00	100.00	0.00	0.00	0.31	0.00
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	2	9.09	87.01	0.00	100.00	0.00	0.00	0.54	0.00
Chico-CA MSA	0	0.00	95.52	0.00	0.00	0.00	0.00	0.00	0.00
Chico-CA MSA	3	13.64	81.03	66.67	100.00	0.00	0.00	1.52	3.13
Fresno, CA MSA	2	9.09	88.91	0.00	100.00	0.00	0.00	0.23	0.00
Hanford-Corcoran, CA MSA	0	0.00	88.15	0.00	0.00	0.00	0.00	0.00	0.00
Madera-Chowchilla, CA MSA	0	0.00	89.83	0.00	0.00	0.00	0.00	0.00	0.00
Merced, CA MSA	0	0.00	90.59	0.00	0.00	0.00	0.00	0.00	0.00
Modesto, CA MSA	0	0.00	92.34	0.00	0.00	0.00	0.00	0.00	0.00
Napa, CA MSA	0	0.00	91.25	0.00	0.00	0.00	0.00	0.00	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	2	9.09	88.32	0.00	100.00	0.00	0.00	0.80	0.00
Redding, CA MSA	0	0.00	95.04	0.00	0.00	0.00	0.00	0.00	0.00
Riverside-San Bernardino-Ontario, CA MSA	1	4.55	91.93	0.00	100.00	0.00	0.00	0.38	0.00
Sacramento--Arden-Arcade--Roseville, CA MSA	0	0.00	93.87	0.00	0.00	0.00	0.00	0.00	0.00
Sacramento--Arden-Arcade--Roseville, CA MSA	1	4.55	80.54	100.00	100.00	0.00	0.00	0.00	0.00
Sacramento--Arden-Arcade--Roseville, CA MD	0	0.00	93.37	0.00	0.00	0.00	0.00	0.00	0.00
San Francisco-San Mateo-Redwood City, CA MSA	0	0.00	91.76	0.00	0.00	0.00	0.00	0.00	0.00
San Jose-Sunnyvale-Santa Clara, CA MSA	0	0.00	95.41	0.00	0.00	0.00	0.00	0.00	0.00
San Luis Obispo-Paso Robles, CA MSA	0	0.00	95.41	0.00	0.00	0.00	0.00	0.00	0.00
Santa Ana-Anaheim-Irvine, CA MD	0	0.00	91.60	0.00	0.00	0.00	0.00	0.00	0.00
Santa Barbara-Santa Maria-Goleta, CA MSA	1	4.55	89.73	0.00	100.00	0.00	0.00	0.00	0.00
Santa Cruz-Watsonville, CA MSA	0	0.00	91.07	0.00	0.00	0.00	0.00	0.00	0.00
Santa Rosa-Petaluma, CA MSA	1	4.55	93.23	0.00	100.00	0.00	0.00	0.00	0.00
Stockton, CA MSA	0	0.00	90.69	0.00	0.00	0.00	0.00	0.00	0.00
Stockton, CA MSA	0	0.00	95.22	0.00	0.00	0.00	0.00	0.00	0.00
Vallejo-Fairfield, CA MSA	1	4.55	87.30	0.00	100.00	0.00	0.00	0.29	0.00
Visalia-Porterville, CA MSA	1	4.55	92.27	0.00	100.00	0.00	0.00	0.00	0.00
Non-Metro CA	0	0.00	95.97	0.00	0.00	0.00	0.00	0.00	0.00
State Total	22	100.00	91.70	27.27	100.00	0.00	0.00	0.13	0.03

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 63.64% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: California									
September 26, 2008 to December 31, 2010									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Los Angeles-Long Beach-Glendale, CA	51	48,330	362	510,439	413	558,769	42.22%	14	73,464
Oakland-Fremont-Hayward, CA MD	22	24,125	87	62,501	109	86,626	6.54%	2	12,262
San Diego-Carlsbad-San Marcos, CA MSA	26	24,224	102	109,338	128	133,562	10.09%	3	16,612
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	5	7,889	10	11,533	15	19,422	1.47%	1	185
Chico, CA MSA	0	0	1	1,777	1	1,777	0.13%	0	0
El Centro, CA MSA	15	9,931	2	346	17	10,277	0.78%	0	0
Fresno, CA MSA	10	23,607	7	9,671	17	33,278	2.51%	2	176
Hanford-Corcoran, CA MSA	0	0	2	1,273	2	1,273	0.10%	0	0
Madera-Chowchilla, CA MSA	2	3,721	1	145	3	3,866	0.29%	0	0
Merced, CA MSA	1	4,953	0	0	1	4,953	0.37%	0	0
Modesto, CA MSA	0	0	10	1,101	10	1,101	0.08%	0	0
Napa, CA MSA	3	1,253	1	7,885	4	9,138	0.69%	0	0
Oxard-Thousand Oaks-Ventura, CA MSA	7	12,860	10	19,861	17	32,721	2.47%	1	12
Redding, CA MSA	0	0	2	4,328	2	4,328	0.33%	0	0
Riverside-San Bernardino-Ontario, CA MSA	27	50,051	116	46,229	143	96,280	7.27%	3	12,327
Sacramento--Arden-Arcade--Roseville, CA MSA	15	20,621	52	20,249	67	40,870	3.09%	0	0
Salinas, CA MSA	7	3,844	11	8,137	18	11,981	0.91%	0	0
San Francisco-San Mateo-Redwood City, CA MD	19	57,747	163	48,154	182	105,901	8.00%	6	14,510
San Jose-Sunnyvale-Santa Clara, CA MSA	13	34,861	30	57,389	43	92,250	6.97%	6	36,180
San Luis Obispo-Paso Robles, CA MSA	2	58	5	1,444	7	1,502	0.11%	0	0
Santa Ana-Anaheim-Irvine, CA MD	12	8,180	60	20,712	72	28,892	2.18%	1	760
Santa Barbara-Santa Maria-Goleta, CA MSA	3	889	4	861	7	1,750	0.13%	1	1
Santa Cruz-Watsonville, CA MSA	1	343	0	0	1	343	0.03%	0	0
Santa Rosa-Petaluma, CA MSA	8	7,897	7	11,953	15	19,850	1.50%	1	71
Stockton, CA MSA	2	1,102	24	1,447	26	2,549	0.19%	0	0
Vallejo-Fairfield, CA MSA	3	1,800	6	977	9	2,777	0.21%	0	0
Visalia-Porterville, CA MSA	5	7,142	2	1,545	7	8,687	0.66%	0	0
Yuba City, CA MSA	1	2,043	0	0	1	2,043	0.15%	0	0
Non-Metro - California	4	3,271	5	3,535	9	6,806	0.51%	0	0
<b>State Total</b>	<b>264</b>	<b>360,742</b>	<b>1,082</b>	<b>962,830</b>	<b>1,346</b>	<b>1,323,572</b>	<b>100.00%</b>	<b>41</b>	<b>166,560</b>
Statewide Investments with Potential to Benefit one or more AAs	1	2,498	41	44,008	42	46,506	N/A	1	4
Statewide Investments with no Potential to Benefit one or more AAs	0	0	0	0	0	0	N/A	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		
Geography: California																		
Evaluation Period: September 26, 2008 to December 31, 2010																		
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	
<b>Full Review:</b>																		
Los Angeles-Long Beach-Glendale, CA MD	33.81	221	27.12	5.43	13.12	30.77	49.77	26	0	1	1	12	12	8.00	29.44	30.88	31.58	
Oakland-Fremont-Hayward, CA MD	7.92	60	7.36	6.67	16.67	48.33	28.33	6	0	0	1	3	2	8.54	20.25	41.14	30.04	
San Diego-Carlsbad-San Marcos, CA MSA	9.75	89	10.92	5.62	26.97	32.58	34.83	14	0	1	5	2	6	7.78	24.46	37.46	30.01	
<b>Limited Review:</b>																		
Bakersfield-Delano, CA MSA	0.88	13	1.60	0.00	23.08	38.46	38.46	3	0	0	0	1	2	4.40	32.14	31.74	30.06	
Chico, CA MSA	0.54	4	0.49	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.16	23.07	52.76	22.01	
Chico, CA MSA	0.19	2	0.25	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	25.50	47.45	27.05	
Fresno, CA MSA	0.77	15	1.84	0.00	26.67	33.33	40.00	2	0	0	1	0	1	4.73	32.88	35.66	26.63	
Hanford-Corcoran, CA MSA	0.05	1	0.12	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	35.42	35.84	23.81	
Madera-Chowchilla, CA MSA	0.18	2	0.25	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	21.87	54.77	23.36	
Merced, CA MSA	0.23	4	0.49	0.00	25.00	50.00	25.00	2	0	0	0	1	1	0.00	26.44	50.04	23.52	
Modesto, CA MSA	0.86	9	1.10	0.00	11.11	33.33	55.56	1	0	0	0	0	1	2.66	21.22	52.77	23.35	
Napa, CA MSA	0.19	3	0.37	0.00	33.33	66.67	0.00	1	0	0	1	0	0	0.00	16.66	63.01	20.33	
Oxnard-Thousand Oaks-Ventura, CA MSA	2.82	22	2.70	0.00	13.64	59.09	27.27	2	0	0	0	0	2	3.86	23.98	44.41	27.75	
Redding, CA MSA	0.22	2	0.25	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.00	18.51	66.24	15.25	
Riverside-San Bernardino-Ontario, CA MSA	6.08	72	8.83	2.78	19.44	44.44	33.33	19	0	0	3	10	6	3.53	28.54	41.16	26.73	
Sacramento--Arden-Arcade--Roseville, CA MSA	3.34	43	5.28	2.33	16.28	44.19	37.21	9	2	1	0	4	2	6.61	25.18	38.80	29.41	
Salinas, CA MSA	1.58	14	1.72	0.00	42.86	28.57	28.57	0	0	0	0	0	0	0.00	26.32	48.43	25.25	
San Francisco-San Mateo-Redwood City, CA MD	7.32	49	6.01	16.33	18.37	40.82	24.49	6	0	0	3	3	0	7.21	21.80	42.21	28.77	
San Jose-Sunnyvale-Santa Clara, CA MSA	6.62	45	5.52	0.00	26.67	42.22	31.11	6	0	0	1	3	2	3.90	24.42	46.97	24.71	
San Luis Obispo-Paso Robles, CA MSA	0.86	7	0.86	0.00	28.57	71.43	0.00	0	0	0	0	0	0	0.00	16.72	69.48	13.79	
Santa Ana-Anaheim-Irvine, CA MD	10.29	72	8.83	1.39	30.56	29.17	38.89	10	0	0	2	1	7	4.95	30.96	31.84	32.26	
Santa Barbara-Santa Maria-Goleta, CA MSA	0.91	8	0.98	12.50	12.50	50.00	25.00	1	0	0	0	1	0	6.08	31.57	33.18	29.18	
Santa Cruz-Watsonville, CA MSA	0.83	5	0.61	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	31.25	39.43	29.32	
Santa Rosa-Petaluma, CA MSA	0.98	12	1.47	0.00	33.33	66.67	0.00	1	0	0	0	1	0	0.00	14.38	69.79	15.83	
Stockton, CA MSA	0.68	13	1.60	7.69	7.69	38.46	46.15	3	0	0	0	1	2	5.88	25.65	38.34	30.13	
Vallejo-Fairfield, CA MSA	0.47	9	1.10	0.00	22.22	44.44	33.33	1	0	0	0	0	1	1.55	22.77	47.80	27.02	
Visalia-Porterville, CA MSA	0.20	4	0.49	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	32.31	38.64	28.80	
Yuba City, CA MSA	0.33	3	0.37	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	25.62	51.20	23.18	
Non-Metro CA	1.10	12	1.47	0.00	58.33	41.67	0.00	0	0	0	0	0	0	0.00	19.06	62.00	18.94	



DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																Geography: California				Evaluation Period: September 26, 2008 to December 31, 2010			
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population											
	% of Rated Area Deposits in AA*	# of Bank Branches **	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net Change in Location of Branches (+ or -)				% of Population within each Geography									
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp						
State Total	100.00	815	100.00	4.29	20.86	38.16	36.44	114	2	3	18	44	47	5.75	26.68	38.57	28.87						

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 704 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		Colorado						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Denver-Aurora-Broomfield, CO MSA	63.83	40,989	9,862,469	3,665	331,975	4	415	83	113,779	44,741	10,308,638	72.76
<b>Limited Review:</b>												
Boulder, CO MSA	10.96	6,801	1,923,921	879	104,617	2	60	4	12,745	7,686	2,041,343	12.76
Colorado Springs, CO MSA	12.97	8,575	1,900,512	518	58,738	0	0	2	4,231	9,095	1,963,481	8.47
Fort Collins-Loveland, CO MSA	7.37	4,649	969,553	513	42,430	3	163	2	8,625	5,167	1,020,771	4.34
Greeley, CO MSA	4.86	3,127	598,339	272	19,216	9	2,476	0	0	3,408	620,031	1.67
<b>Statewide</b>	100.00	64,141	15,254,794	5,847	556,976	18	3,114	91	139,380	70,097	15,954,264	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	6	61,199	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	2,030	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Colorado										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	100.00	3	26,902	3	26,902	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	72.76	
<b>Limited Review:</b>															
Boulder, CO MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.76	
Colorado Springs, CO MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.47	
Fort Collins-Loveland, CO MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.34	
Greeley, CO MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.67	
	100.00	3	26,902	3	26,902	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	1	88,002	1	88,002	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Colorado						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	13,533	65.12	1.89	2.58	21.89	16.77	42.97	42.27	33.26	38.39	3.88	3.26	3.22	3.78	4.42
<b>Limited Review:</b>															
Boulder, CO MSA	1,745	8.40	0.27	0.40	19.36	18.34	44.99	44.81	35.39	36.45	6.42	5.13	5.76	5.40	8.43
Colorado Springs, CO MSA	3,061	14.73	0.12	0.29	19.55	12.68	49.48	48.12	30.85	38.91	5.04	3.85	4.48	5.15	5.13
Fort Collins-Loveland, CO MSA	1,320	6.35	1.28	0.00	13.61	11.89	62.79	58.79	22.32	29.32	3.92	0.00	3.54	4.37	3.29
Greeley, CO MSA	1,122	5.40	0.70	0.18	14.59	6.68	53.62	46.61	31.09	46.52	4.10	0.00	2.11	4.22	4.37
State Total	20,781	100.00	1.40	1.77	20.37	15.44	46.08	44.63	32.15	38.16	4.24	3.26	3.57	4.22	4.68

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Colorado										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	580	63.04	1.89	2.24	21.89	15.34	42.97	39.14	33.26	43.28	2.69	3.77	1.56	2.58	3.14	
<b>Limited Review:</b>																
Boulder, CO MSA	122	13.26	0.27	0.00	19.36	15.57	44.99	45.90	35.39	38.52	6.22	0.00	5.45	1.83	11.26	
Colorado Springs, CO MSA	127	13.80	0.12	0.00	19.55	8.66	49.48	51.18	30.85	40.16	1.76	0.00	0.00	1.06	3.36	
Fort Collins-Loveland, CO MSA	59	6.41	1.28	0.00	13.61	18.64	62.79	57.63	22.32	23.73	2.30	0.00	2.38	2.18	2.50	
Greeley, CO MSA	32	3.48	0.70	0.00	14.59	9.38	53.62	46.88	31.09	43.75	0.90	0.00	0.00	0.00	2.00	
State Total	920	100.00	1.40	1.41	20.37	14.46	46.08	43.15	32.15	40.98	2.65	3.57	1.50	2.05	3.68	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Colorado								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	26,021	62.73	1.89	1.81	21.89	11.78	42.97	38.13	33.26	48.28	5.60	5.07	4.69	5.25	6.09
<b>Limited Review:</b>															
Boulder, CO MSA	4,898	11.81	0.27	0.20	19.36	12.76	44.99	44.30	35.39	42.73	8.35	2.78	6.61	7.94	9.39
Colorado Springs, CO MSA	5,335	12.86	0.12	0.07	19.55	10.12	49.48	43.11	30.85	46.69	4.76	0.00	3.57	4.33	5.48
Fort Collins-Loveland, CO MSA	3,259	7.86	1.28	0.18	13.61	9.42	62.79	58.24	22.32	32.16	5.64	5.56	5.00	5.80	5.57
Greeley, CO MSA	1,969	4.75	0.70	0.66	14.59	6.50	53.62	49.11	31.09	43.73	4.53	7.14	1.55	4.71	4.58
State Total	41,482	100.00	1.40	1.21	20.37	11.25	46.08	41.60	32.15	45.94	5.68	4.94	4.71	5.39	6.16

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Colorado										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	510	83.20	8.54	18.04	40.67	41.37	42.00	35.10	8.79	5.49	3.39	0.00	3.70	4.76	0.00	
<b>Limited Review:</b>																
Boulder, CO MSA	36	5.87	5.73	2.78	38.53	50.00	42.03	47.22	13.71	0.00	18.18	0.00	20.00	20.00	0.00	
Colorado Springs, CO MSA	52	8.48	0.76	1.92	43.58	46.15	44.09	46.15	11.57	5.77	0.00	0.00	0.00	0.00	0.00	
Fort Collins-Loveland, CO MSA	11	1.79	3.99	0.00	39.68	9.09	46.38	63.64	9.95	27.27	0.00	0.00	0.00	0.00	0.00	
Greeley, CO MSA	4	0.65	9.66	0.00	49.21	25.00	27.61	25.00	13.52	50.00	0.00	0.00	0.00	0.00	0.00	
<b>State Total</b>	<b>613</b>	<b>100.00</b>	<b>7.14</b>	<b>15.33</b>	<b>40.87</b>	<b>41.60</b>	<b>41.82</b>	<b>37.19</b>	<b>10.17</b>	<b>5.87</b>	<b>3.43</b>	<b>0.00</b>	<b>3.57</b>	<b>5.17</b>	<b>0.00</b>	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Colorado								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	3,608	62.31	3.33	3.63	21.49	26.39	37.53	33.54	36.64	36.45	0.45	0.69	0.55	0.45	0.38
<b>Limited Review:</b>															
Boulder, CO MSA	879	15.18	1.07	1.02	28.97	29.47	39.79	40.50	30.16	29.01	0.78	1.33	1.06	0.72	0.61
Colorado Springs, CO MSA	518	8.95	4.14	9.65	22.10	22.20	41.29	38.42	32.47	29.73	0.30	1.50	0.32	0.22	0.26
Fort Collins-Loveland, CO MSA	513	8.86	1.02	0.39	22.13	27.29	51.57	48.54	25.29	23.78	0.43	0.00	0.39	0.45	0.42
Greeley, CO MSA	272	4.70	3.62	3.68	11.63	17.65	48.99	39.71	35.74	38.97	0.65	0.56	1.28	0.62	0.55
State Total	5,790	100.00	3.06	3.49	21.83	26.15	39.92	36.65	34.53	33.71	0.47	0.83	0.58	0.45	0.40

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data



**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Colorado								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	4	22.22	1.54	0.00	18.93	0.00	41.77	75.00	37.32	25.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Boulder, CO MSA	2	11.11	0.13	0.00	21.79	0.00	47.99	0.00	29.95	100.00	0.00	0.00	0.00	0.00	0.00
Colorado Springs, CO MSA	0	0.00	1.84	0.00	16.55	0.00	53.24	0.00	28.36	0.00	0.00	0.00	0.00	0.00	0.00
Fort Collins-Loveland, CO MSA	3	16.67	0.90	0.00	13.97	33.33	56.69	66.67	28.44	0.00	0.91	0.00	0.00	1.37	0.00
Greeley, CO MSA	9	50.00	0.94	0.00	6.30	0.00	67.36	77.78	25.40	22.22	0.64	0.00	0.00	0.45	1.22
<b>State Total</b>	<b>18</b>	<b>100.00</b>	<b>1.28</b>	<b>0.00</b>	<b>16.13</b>	<b>5.56</b>	<b>49.85</b>	<b>66.67</b>	<b>32.51</b>	<b>27.78</b>	<b>0.35</b>	<b>0.00</b>	<b>0.00</b>	<b>0.38</b>	<b>0.39</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Colorado										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	13,690	65.38	18.01	8.57	18.65	21.50	23.68	24.37	39.66	45.55	4.43	3.77	3.78	4.41	5.37	
<b>Limited Review:</b>																
Boulder, CO MSA	1,745	8.33	19.44	9.32	18.52	17.67	22.39	25.48	39.66	47.53	7.21	6.29	5.69	7.27	8.64	
Colorado Springs, CO MSA	3,061	14.62	17.17	7.94	18.97	25.31	24.84	28.32	39.03	38.43	6.07	4.91	6.61	5.69	6.35	
Fort Collins-Loveland, CO MSA	1,320	6.30	16.76	9.91	19.36	20.73	25.32	22.39	38.56	46.97	4.00	4.56	2.61	3.53	5.39	
Greeley, CO MSA	1,122	5.36	19.33	8.19	17.93	20.48	24.16	29.52	38.59	41.81	2.84	3.83	2.03	2.25	3.70	
State Total	20,938	100.00	17.96	8.61	18.70	21.63	23.91	25.16	39.43	44.60	4.73	4.16	4.17	4.58	5.64	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.5% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Colorado								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	581	63.08	18.01	5.98	18.65	18.75	23.68	21.20	39.66	54.08	2.91	3.36	2.17	2.24	3.55
<b>Limited Review:</b>															
Boulder, CO MSA	122	13.25	19.44	3.92	18.52	23.53	22.39	25.49	39.66	47.06	6.65	0.00	6.85	4.44	9.21
Colorado Springs, CO MSA	127	13.79	17.17	9.88	18.97	12.35	24.84	27.16	39.03	50.62	1.91	0.00	1.08	1.23	3.17
Fort Collins-Loveland, CO MSA	59	6.41	16.76	18.18	19.36	6.06	25.32	18.18	38.56	57.58	2.49	9.09	1.23	2.08	1.97
Greeley, CO MSA	32	3.47	19.33	16.67	17.93	16.67	24.16	16.67	38.59	50.00	0.96	0.00	4.08	0.00	0.00
State Total	921	100.00	17.96	7.14	18.70	17.94	23.91	22.43	39.43	52.49	2.87	2.57	2.33	2.10	3.61

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 34.6% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Colorado										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Denver-Aurora-Broomfield, CO MSA	26,208	62.90	18.01	5.34	18.65	16.33	23.68	25.87	39.66	52.45	6.88	6.59	6.13	6.66	7.29	
<b>Limited Review:</b>																
Boulder, CO MSA	4,898	11.75	19.44	7.44	18.52	18.03	22.39	26.06	39.66	48.46	9.49	9.38	9.63	8.85	9.83	
Colorado Springs, CO MSA	5,335	12.80	17.17	6.43	18.97	18.81	24.84	26.84	39.03	47.92	5.69	5.38	5.80	5.21	5.98	
Fort Collins-Loveland, CO MSA	3,259	7.82	16.76	8.56	19.36	19.58	25.32	28.17	38.56	43.69	6.66	7.26	6.53	7.03	6.39	
Greeley, CO MSA	1,969	4.73	19.33	5.51	17.93	17.41	24.16	26.33	38.59	50.75	5.55	6.14	5.99	6.01	5.12	
State Total	41,669	100.00	17.96	6.00	18.70	17.15	23.91	26.22	39.43	50.63	6.91	6.79	6.49	6.70	7.20	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.7% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Colorado			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	3,665	62.68	79.89	57.49	85.76	7.04	7.20	0.45	0.30
<b>Limited Review:</b>									
Boulder, CO MSA	879	15.03	81.91	62.80	79.86	9.10	11.04	0.78	0.55
Colorado Springs, CO MSA	518	8.86	81.53	52.12	78.19	9.85	11.97	0.30	0.24
Fort Collins-Loveland, CO MSA	513	8.77	82.01	55.56	86.74	6.43	6.82	0.43	0.34
Greeley, CO MSA	272	4.65	81.68	42.65	90.07	5.51	4.41	0.65	0.18
State Total	5,847	100.00	80.55	56.95	84.49	7.47	8.04	0.47	0.31

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 18.37% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Colorado			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	4	22.22	95.21	25.00	75.00	25.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Boulder, CO MSA	2	11.11	96.26	100.00	100.00	0.00	0.00	0.00	0.00
Colorado Springs, CO MSA	0	0.00	95.35	0.00	0.00	0.00	0.00	0.00	0.00
Fort Collins-Loveland, CO MSA	3	16.67	96.81	66.67	100.00	0.00	0.00	0.91	0.00
Greeley, CO MSA	9	50.00	94.30	22.22	44.44	0.00	55.56	0.64	0.00
State Total	18	100.00	95.34	38.89	66.67	5.56	27.78	0.35	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 22.22% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Colorado				January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
Denver-Aurora, CO	32	25,806	140	59,364	172	85,170	80.26%	3	8,569	
<b>Limited Review:</b>										
Boulder, CO	4	482	21	10,176	25	10,658	10.04%	0	0	
Colorado Springs, CO	8	3,116	13	5,834	21	8,950	8.43%	0	0	
Fort Collins-Loveland, CO	4	668	10	247	14	915	0.86%	1	9,384	
Greeley, CO	4	419	0	0	4	419	0.39%	1	113	
	52	30,491	184	75,621	236	106,112	100.00%	5	18,066	
Statewide Investments with Potential to Benefit one or more AAs	23	3,197	16	2,996	39	6,193	N/A	1	0	
Statewide Investments with no Potential to Benefit one or more AAs	1	8,043	7	43	8	8,086	N/A	0	0	

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Colorado																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Denver-Aurora-Broomfield, CO MSA	72.76	74	62.18	0.00	28.38	37.84	33.78	14	8	0	0	5	1	4.56	27.71	40.28	27.32
<b>Limited Review:</b>																	
Boulder, CO MSA	12.76	14	11.76	0.00	21.43	64.29	14.29	3	1	0	-1	2	1	3.35	25.38	41.56	29.70
Colorado Springs, CO MSA	8.47	15	12.61	0.00	6.67	73.33	20.00	5	1	-1	0	4	1	0.34	26.24	47.96	25.46
Fort Collins-Loveland, CO MSA	4.34	11	9.24	0.00	27.27	63.64	9.09	4	1	0	0	3	0	3.28	19.05	59.01	18.66
Greeley, CO MSA	1.67	5	4.20	20.00	20.00	40.00	20.00	2	1	0	-1	2	0	2.21	21.67	49.61	25.28
State Total	100.00	119	100.00	0.84	24.37	47.90	26.89	28	12	-1	-2	16	3	3.60	26.34	43.44	26.48

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 26 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.



**Table 1. Lending Volume**

Lending Volume		Connecticut						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Bridgeport-Stamford-Norwalk, CT MSA	88.92	15,393	6,430,515	1,869	185,201	3	51	34	100,885	17,299	6,716,652	94.79
<b>Limited Review:</b>												
New Haven-Milford, CT MSA	11.08	2,002	470,213	147	14,722	0	0	7	12,849	2,156	497,784	5.21
<b>Statewide</b>	100.00	17,395	6,900,728	2,016	199,923	3	51	41	113,734	19,455	7,214,436	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	6	10,628	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

**Table 1. Other Products**

Lending Volume		Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Bridgeport-Stamford-Norwalk, CT MSA	100.00	2	494	2	494	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	94.79
<b>Limited Review:</b>														
New Haven-Milford, CT MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.21
	100.00	2	494	2	494	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	5	511,140	5	511,140	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	4,747	88.17	3.34	3.98	16.53	19.53	39.53	37.14	40.60	39.35	7.01	3.61	5.92	8.34	6.58
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	637	11.83	6.30	6.12	26.15	29.04	35.61	34.54	31.94	30.30	4.40	2.82	3.05	3.87	6.68
State Total	5,384	100.00	3.84	4.23	18.17	20.65	38.86	36.83	39.12	38.28	6.55	3.44	5.24	7.60	6.60

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	276	84.66	3.34	3.62	16.53	16.67	39.53	38.77	40.60	40.94	3.97	0.00	2.52	2.95	5.41
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	50	15.34	6.30	8.00	26.15	26.00	35.61	36.00	31.94	30.00	0.97	0.00	1.35	1.65	0.00
State Total	326	100.00	3.84	4.29	18.17	18.10	38.86	38.34	39.12	39.26	3.28	0.00	2.07	2.67	4.42

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	10,253	89.23	3.34	2.21	16.53	11.77	39.53	35.60	40.60	50.41	9.86	5.02	7.05	9.38	10.95
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	1,238	10.77	6.30	6.79	26.15	23.59	35.61	35.22	31.94	34.41	5.27	2.96	2.77	6.07	5.87
State Total	11,491	100.00	3.84	2.71	18.17	13.04	38.86	35.56	39.12	48.69	9.24	4.37	6.16	8.93	10.39

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	117	60.31	20.80	39.32	42.87	47.01	29.03	11.11	7.31	2.56	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	77	39.69	25.69	36.36	47.89	50.65	18.79	10.39	7.62	2.60	0.00	0.00	0.00	0.00	0.00
State Total	194	100.00	22.34	38.14	44.45	48.45	25.81	10.82	7.41	2.58	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
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
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	1,869	92.71	7.63	11.24	19.15	16.53	34.40	36.01	38.81	36.22	1.12	1.88	1.26	1.28	0.82
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	147	7.29	12.94	11.56	34.21	29.25	26.69	24.49	26.10	34.69	0.43	0.00	0.37	0.25	0.86
State Total	2,016	100.00	8.51	11.26	21.66	17.46	33.11	35.17	36.70	36.11	1.00	1.33	1.01	1.13	0.82

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	3	100.00	4.96	0.00	17.68	0.00	36.65	33.33	40.71	66.67	2.22	0.00	0.00	7.69	0.00
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	0	0.00	4.38	0.00	24.30	0.00	29.88	0.00	41.43	0.00	0.00	0.00	0.00	0.00	0.00
State Total	3	100.00	4.90	0.00	18.33	0.00	36.00	33.33	40.78	66.67	2.08	0.00	0.00	7.69	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data



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

Borrower Distribution: HOME PURCHASE		Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	4,747	88.17	21.61	6.86	17.25	20.05	19.58	23.77	41.56	49.32	7.69	6.51	7.92	8.93	7.20
<b>Limited Review:</b>															
New Haven-Milford, CT MSA	637	11.83	28.54	4.72	18.83	28.68	20.54	28.49	32.10	38.11	5.08	2.92	4.77	4.89	6.22
State Total	5,384	100.00	22.99	6.60	17.57	21.08	19.77	24.34	39.67	47.97	7.24	6.03	7.22	8.04	7.08

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.2% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Connecticut								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	276	84.66	21.61	6.90	17.25	16.26	19.58	24.14	41.56	52.71	3.95	2.47	2.76	4.07	4.58	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	50	15.34	28.54	9.30	18.83	20.93	20.54	37.21	32.10	32.56	1.00	0.00	0.00	2.25	0.77	
State Total	326	100.00	22.99	7.32	17.57	17.07	19.77	26.42	39.67	49.19	3.26	1.96	2.07	3.58	3.77	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 24.5% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Connecticut										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Bridgeport-Stamford-Norwalk, CT MSA	10,253	89.23	21.61	5.28	17.25	15.85	19.58	23.73	41.56	55.14	10.82	9.10	10.14	11.64	10.85	
<b>Limited Review:</b>																
New Haven-Milford, CT MSA	1,238	10.77	28.54	5.86	18.83	20.84	20.54	29.32	32.10	43.98	6.05	2.01	5.35	5.13	7.46	
State Total	11,491	100.00	22.99	5.34	17.57	16.39	19.77	24.33	39.67	53.94	10.21	8.30	9.37	10.60	10.50	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 22.6% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Connecticut			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT MSA	1,869	92.71	79.90	36.17	85.34	5.78	8.88	1.12	0.73
<b>Limited Review:</b>									
New Haven-Milford, CT MSA	147	7.29	76.14	21.77	82.99	8.16	8.84	0.43	0.25
State Total	2,016	100.00	79.27	35.12	85.17	5.95	8.88	1.00	0.66

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 40.08% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Connecticut			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT MSA	3	100.00	96.71	33.33	100.00	0.00	0.00	2.22	0.00
<b>Limited Review:</b>									
New Haven-Milford, CT MSA	0	0.00	97.21	0.00	0.00	0.00	0.00	0.00	0.00
State Total	3	100.00	96.76	33.33	100.00	0.00	0.00	2.08	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 66.67% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Connecticut				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT	1	221	61	22,340	62	22,561	81.37%	1	14,857
<b>Limited Review:</b>									
New Haven-Milford, CT	6	2,383	20	2,781	26	5,164	18.63%	2	8,456
<b>State Total</b>	7	2,604	81	25,121	88	27,725	100.00%	3	23,313
Statewide Investments with Potential to Benefit one or more AAs	22	3,051	13	7,299	35	10,350	N/A	2	5,669
Statewide Investments with no Potential to Benefit one or more AAs	0	0	6	28	6	28	N/A	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Connecticut																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Bridgeport-Stamford-Norwalk, CT MSA	94.79	43	89.58	6.98	9.30	37.21	46.51	2	1	-1	0	1	1	10.24	22.80	33.16	33.80
<b>Limited Review:</b>																	
New Haven-Milford, CT MSA	5.21	5	10.42	0.00	40.00	20.00	40.00	3	0	0	1	1	1	16.90	37.92	25.95	19.18
State Total	100.00	48	100.00	6.25	12.50	35.42	45.83	5	1	-1	1	2	2	11.67	26.05	31.61	30.66

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 7 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

Table 1. Lending Volume

Lending Volume		Florida						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Miami-Miami Beach-Kendall, FL MD ^	22.90	31,766	8,562,364	3,136	148,663	0	0	54	71,356	34,956	8,782,383	33.10
<b>Limited Review:</b>												
Cape Coral-Fort Myers, FL MSA ^	5.03	7,580	1,665,683	101	7,952	0	0	0	0	7,681	1,673,635	0.59
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	1.16	1,720	277,342	54	2,304	1	25	2	7,440	1,777	287,111	0.33
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	15.14	21,724	5,430,160	1,360	66,424	0	0	23	24,086	23,107	5,520,670	16.15
Jacksonville, FL MSA ^^	3.25	4,853	923,097	111	9,836	0	0	1	27,765	4,965	960,698	0.07
Lakeland-Winter Haven, FL MSA ^^	1.60	2,348	337,391	88	4,142	0	0	0	0	2,436	341,533	0.49
Naples-Marco Island, FL MSA ^	0.88	1,292	564,316	43	2,959	0	0	1	352	1,336	567,627	1.13
North Port-Bradenton-Sarasota, FL MSA ^	4.63	6,751	1,719,371	314	13,535	2	59	6	12,185	7,073	1,745,150	2.14
Orlando-Kissimmee-Sanford, FL MSA ^	15.10	21,917	4,229,435	1,125	57,399	0	0	4	20,288	23,046	4,307,122	12.96
Palm Bay-Melbourne-Titusville, FL MSA ^^	1.92	2,711	457,324	215	9,855	1	41	1	6,600	2,928	473,820	3.22
Port St. Lucie, FL MSA ^^	1.72	2,459	530,621	168	7,474	0	0	1	267	2,628	538,362	1.96
Sebastian-Vero Beach, FL MSA ^^	0.63	915	222,522	43	1,796	0	0	0	0	958	224,318	0.55
Tampa-St. Petersburg-Clearwater, FL MSA ^	15.07	22,234	4,188,393	740	41,358	5	967	21	72,206	23,000	4,302,924	3.79
West Palm Beach-Florida/Raton-	10.99	15,331	4,172,869	1,428	66,156	1	20	18	16,446	16,778	4,255,491	23.53
<b>State Total</b>	<b>100.00</b>	<b>143,601</b>	<b>33,280,888</b>	<b>8,926</b>	<b>439,853</b>	<b>10</b>	<b>1,112</b>	<b>132</b>	<b>258,991</b>	<b>152,669</b>	<b>33,980,844</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	3	14,500	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010



Table 1. Other Products

Lending Volume		Florida						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Miami-Miami Beach-Kendall, FL MD ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33.10
<b>Limited Review:</b>														
Cape Coral-Fort Myers, FL MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.59
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.33
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	53.33	2	2,596	2	2,596	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	16.15
Jacksonville, FL MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.07
Lakeland-Winter Haven, FL MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.49
Naples-Marco Island, FL MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.13
North Port-Bradenton-Sarasota, FL MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.14
Orlando-Kissimmee-Sanford, FL MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.96
Palm Bay-Melbourne-Titusville, FL MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.22
Port St. Lucie, FL MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.96
Sebastian-Vero Beach, FL MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.55
Tampa-St. Petersburg-Clearwater, FL MSA ^	46.67	1	2,272	1	2,272	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.79
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	23.53
<b>State Total</b>	100.00	3	4,868	3	4,868	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Florida								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	15,552	23.50	1.69	4.43	19.82	19.43	36.99	35.57	41.51	40.57	3.56	3.56	2.65	3.67	3.82
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	4,127	6.24	0.87	0.10	13.24	11.46	63.06	67.39	22.84	21.06	5.47	0.00	7.78	6.25	2.56
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	746	1.13	0.47	0.00	9.62	4.16	74.00	82.04	15.91	13.81	4.52	0.00	1.97	5.26	2.58
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^^	9,638	14.56	1.16	2.55	23.67	20.24	45.93	43.90	29.24	33.31	3.12	0.54	2.81	3.27	3.18
Jacksonville, FL MSA ^^	2,001	3.02	1.98	0.60	16.44	10.14	54.98	58.97	26.60	30.28	3.81	0.86	2.61	4.23	3.60
Lakeland-Winter Haven, FL MSA ^^	1,439	2.17	0.14	0.00	15.41	8.83	60.75	64.00	23.70	27.17	7.35	0.00	7.21	7.10	7.96
Naples-Marco Island, FL MSA ^	496	0.75	0.00	0.00	0.00	0.00	33.03	35.28	66.97	64.72	3.62	0.00	0.00	3.39	3.74
North Port-Bradenton-Sarasota, FL MSA ^	2,836	4.29	0.30	0.14	20.46	11.92	54.68	54.90	24.56	33.04	3.33	0.00	2.51	3.75	2.88
Orlando-Kissimmee-Sanford, FL MSA ^	10,768	16.27	0.62	0.20	17.95	16.67	49.89	54.29	31.54	28.84	5.09	1.67	5.49	5.61	4.16
Palm Bay-Melbourne-Titusville, FL MSA ^^	895	1.35	0.62	0.22	17.75	9.61	49.76	58.88	31.87	31.28	2.48	0.00	1.52	2.55	2.69
Port St. Lucie, FL MSA ^^	1,277	1.93	1.15	0.23	11.40	5.40	62.21	76.19	25.24	18.17	5.87	0.00	4.41	6.04	5.48
Sebastian-Vero Beach, FL MSA ^^	333	0.50	0.00	0.00	13.47	9.91	61.60	62.16	24.93	27.93	5.41	0.00	3.47	5.40	6.40
Tampa-St. Petersburg-Clearwater, FL MSA ^	9,569	14.46	0.77	0.84	21.94	18.51	48.28	43.84	29.01	36.82	4.28	0.61	4.92	4.22	4.10
West Palm Beach-Florida/Raton-	6,504	9.83	1.53	1.91	24.63	22.34	36.35	35.70	37.50	40.05	3.79	1.98	2.85	4.03	4.09
State Total ^^	66,181	100.00	1.02	1.79	19.36	17.15	49.02	46.93	30.59	34.13	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Florida								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	664	24.41	1.69	1.81	19.82	20.78	36.99	38.10	41.51	39.31	2.55	0.00	1.00	1.83	3.43
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	126	4.63	0.87	0.00	13.24	11.11	63.06	73.81	22.84	15.08	1.40	0.00	0.00	2.19	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	33	1.21	0.47	0.00	9.62	3.03	74.00	87.88	15.91	9.09	0.77	0.00	0.00	1.05	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	426	15.66	1.16	1.88	23.67	19.48	45.93	43.19	29.24	35.45	2.57	0.00	0.90	2.75	3.03
Jacksonville, FL MSA ^^	75	2.76	1.98	0.00	16.44	17.33	54.98	38.67	26.60	44.00	1.46	0.00	1.29	0.96	2.42
Lakeland-Winter Haven, FL MSA ^^	28	1.03	0.14	0.00	15.41	0.00	60.75	75.00	23.70	25.00	0.54	0.00	0.00	0.00	1.64
Naples-Marco Island, FL MSA ^	18	0.66	0.00	0.00	0.00	0.00	33.03	33.33	66.97	66.67	2.78	0.00	0.00	0.00	5.26
North Port-Bradenton-Sarasota, FL MSA ^	137	5.04	0.30	0.00	20.46	14.60	54.68	53.28	24.56	32.12	2.35	0.00	2.00	3.26	0.94
Orlando-Kissimmee-Sanford, FL MSA ^	392	14.41	0.62	0.26	17.95	16.84	49.89	50.51	31.54	32.40	1.64	0.00	0.88	1.32	2.22
Palm Bay-Melbourne-Titusville, FL MSA ^^	91	3.35	0.62	0.00	17.75	9.89	49.76	62.64	31.87	27.47	1.27	0.00	0.00	1.83	0.85
Port St. Lucie, FL MSA ^^	38	1.40	1.15	0.00	11.40	5.26	62.21	78.95	25.24	15.79	1.78	0.00	0.00	2.27	1.18
Sebastian-Vero Beach, FL MSA ^^	28	1.03	0.00	0.00	13.47	21.43	61.60	57.14	24.93	21.43	1.27	0.00	0.00	0.00	4.35
Tampa-St. Petersburg-Clearwater, FL MSA ^	355	13.05	0.77	1.13	21.94	17.46	48.28	47.32	29.01	34.08	0.75	0.00	0.38	0.64	1.04
West Palm Beach-Florida Raton- State Total ^^	309	11.36	1.53	2.27	24.63	18.45	36.35	40.13	37.50	39.16	2.68	0.00	1.14	1.51	3.95
State Total ^^	2,720	100.00	1.02	1.18	19.36	17.32	49.02	47.10	30.59	34.41	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Florida										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami-Miami Beach-Kendall, FL MD ^	14,873	20.46	1.69	1.90	19.82	16.83	36.99	35.17	41.51	46.10	5.69	2.58	2.93	4.55	7.08	
<b>Limited Review:</b>																
Cape Coral-Fort Myers, FL MSA ^	3,281	4.51	0.87	0.40	13.24	7.74	63.06	61.11	22.84	30.75	5.19	0.00	4.79	4.71	5.80	
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	921	1.27	0.47	0.33	9.62	6.19	74.00	69.60	15.91	23.89	4.19	0.00	5.39	4.08	4.28	
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^^	11,163	15.35	1.16	1.33	23.67	16.28	45.93	42.62	29.24	39.77	6.07	4.76	3.91	6.10	6.59	
Jacksonville, FL MSA ^^	2,739	3.77	1.98	0.66	16.44	9.16	54.98	51.41	26.60	38.77	3.41	0.96	2.82	3.53	3.44	
Lakeland-Winter Haven, FL MSA ^^	847	1.16	0.14	0.00	15.41	9.21	60.75	58.32	23.70	32.47	3.42	0.00	3.76	3.62	2.98	
Naples-Marco Island, FL MSA ^	770	1.06	0.00	0.00	0.00	0.00	33.03	32.47	66.97	67.53	6.06	0.00	0.00	7.21	5.66	
North Port-Bradenton-Sarasota, FL MSA ^	3,744	5.15	0.30	0.16	20.46	10.04	54.68	51.42	24.56	38.38	5.20	0.00	2.72	4.97	5.96	
Orlando-Kissimmee-Sanford, FL MSA ^	10,609	14.59	0.62	0.40	17.95	12.89	49.89	47.67	31.54	39.04	4.92	3.17	3.87	4.89	5.19	
Palm Bay-Melbourne-Titusville, FL MSA ^^	1,707	2.35	0.62	0.12	17.75	7.67	49.76	49.27	31.87	42.94	5.65	0.00	4.03	5.30	6.36	
Port St. Lucie, FL MSA ^^	1,116	1.53	1.15	0.54	11.40	6.18	62.21	60.93	25.24	32.35	6.06	0.00	5.12	5.81	6.71	
Sebastian-Vero Beach, FL MSA ^^	551	0.76	0.00	0.00	13.47	7.44	61.60	55.90	24.93	36.66	9.83	0.00	9.35	10.04	9.62	
Tampa-St. Petersburg-Clearwater, FL MSA ^	12,096	16.64	0.77	0.60	21.94	15.77	48.28	41.10	29.01	42.52	4.12	2.17	3.30	3.72	4.72	
West Palm Beach-Florida/Raton- State Total ^^	8,287	11.40	1.53	1.30	24.63	16.21	36.35	33.37	37.50	49.13	6.50	4.51	4.54	6.36	6.99	
	72,704	100.00	1.02	0.97	19.36	14.02	49.02	43.10	30.59	41.91	N/A	N/A	N/A	N/A	N/A	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

Table 5. Geographic Distribution of Multi-Family Loans

Geographic Distribution: MULTI-FAMILY		Geography: Florida								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	588	30.93	6.85	10.20	35.49	40.48	30.24	23.81	27.42	25.51	1.27	0.00	2.17	0.00	0.00
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	46	2.42	1.45	2.17	15.27	17.39	44.37	65.22	38.90	15.22	0.00	0.00	0.00	0.00	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	20	1.05	1.77	0.00	26.94	30.00	60.83	55.00	10.46	15.00	0.00	0.00	0.00	0.00	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	497	26.14	2.27	8.25	32.48	31.99	48.64	38.23	16.61	21.53	0.00	0.00	0.00	0.00	0.00
Jacksonville, FL MSA ^^	38	2.00	5.03	2.63	21.26	23.68	52.80	52.63	20.92	21.05	0.00	0.00	0.00	0.00	0.00
Lakeland-Winter Haven, FL MSA ^^	34	1.79	2.87	0.00	23.09	29.41	42.68	61.76	31.35	8.82	0.00	0.00	0.00	0.00	0.00
Naples-Marco Island, FL MSA ^	8	0.42	0.00	0.00	0.00	0.00	21.35	0.00	78.65	100.00	0.00	0.00	0.00	0.00	0.00
North Port-Bradenton-Sarasota, FL MSA ^	34	1.79	0.53	0.00	20.94	29.41	43.00	26.47	35.54	44.12	0.00	0.00	0.00	0.00	0.00
Orlando-Kissimmee-Sanford, FL MSA ^	148	7.79	2.41	4.05	30.42	18.24	49.93	45.27	17.23	32.43	0.00	0.00	0.00	0.00	0.00
Palm Bay-Melbourne-Titusville, FL MSA ^^	18	0.95	2.10	0.00	26.13	22.22	53.00	55.56	18.77	22.22	0.00	0.00	0.00	0.00	0.00
Port St. Lucie, FL MSA ^^	28	1.47	2.19	7.14	14.37	7.14	43.56	46.43	39.88	39.29	0.00	0.00	0.00	0.00	0.00
Sebastian-Vero Beach, FL MSA ^^	3	0.16	0.00	0.00	18.93	33.33	45.98	33.33	35.08	33.33	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater, FL MSA ^	214	11.26	4.33	6.54	18.88	28.97	49.17	37.38	27.61	27.10	0.00	0.00	0.00	0.00	0.00
West Palm Beach-Ft. Pierce-Raton-	225	11.84	3.13	6.22	32.78	44.44	31.51	33.78	32.58	15.56	0.00	0.00	0.00	0.00	0.00
State Total ^^	1,901	100.00	3.69	7.31	27.87	33.46	42.44	35.14	26.00	24.09	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Florida						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	3,107	34.93	4.08	3.80	20.30	19.76	32.22	32.09	42.88	44.35	0.36	0.39	0.28	0.36	0.39
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	101	1.14	0.84	0.99	12.71	9.90	60.98	53.47	25.48	35.64	0.18	0.96	0.22	0.17	0.15
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	54	0.61	0.83	0.00	15.53	20.37	66.17	64.81	17.47	14.81	0.15	0.00	0.12	0.17	0.10
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	1,360	15.29	4.26	4.19	20.49	19.85	41.95	42.87	33.31	33.09	0.25	0.27	0.31	0.26	0.22
Jacksonville, FL MSA ^^	111	1.25	3.57	6.31	19.68	33.33	50.82	36.04	25.93	24.32	0.20	0.57	0.28	0.12	0.21
Lakeland-Winter Haven, FL MSA ^^	88	0.99	0.28	2.27	19.26	23.86	57.67	51.14	22.78	22.73	0.06	0.00	0.17	0.02	0.05
Naples-Marco Island, FL MSA ^	43	0.48	0.00	0.00	0.00	0.00	34.55	27.91	65.45	72.09	0.35	0.00	0.00	0.00	0.51
North Port-Bradenton-Sarasota, FL MSA ^	314	3.53	0.37	0.32	18.60	17.83	51.91	51.27	29.12	30.57	0.20	0.00	0.14	0.20	0.24
Orlando-Kissimmee-Sanford, FL MSA ^	1,125	12.65	1.18	1.42	19.17	17.16	47.26	44.44	32.39	36.98	0.23	0.00	0.24	0.21	0.27
Palm Bay-Melbourne-Titusville, FL MSA ^^	215	2.42	1.06	0.47	21.92	20.47	46.59	48.84	30.44	30.23	0.12	0.00	0.26	0.09	0.09
Port St. Lucie, FL MSA ^^	168	1.89	2.22	0.60	17.60	22.62	57.37	61.31	22.81	15.48	0.33	0.59	0.36	0.26	0.43
Sebastian-Vero Beach, FL MSA ^^	43	0.48	0.00	0.00	12.68	25.58	60.31	48.84	27.01	25.58	0.25	0.00	0.44	0.24	0.19
Tampa-St. Petersburg-Clearwater, FL MSA ^	740	8.32	1.49	1.22	22.81	25.68	42.68	43.24	33.02	29.86	0.15	0.12	0.17	0.16	0.12
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	1,426	16.03	2.96	3.09	19.95	26.23	34.17	32.96	42.77	37.73	0.41	0.53	0.51	0.39	0.37
State Total ^^	8,895	100.00	2.42	2.89	19.62	21.01	43.91	38.74	33.94	37.36	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Florida						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	0	0.00	2.51	0.00	18.09	0.00	33.91	0.00	45.28	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	0	0.00	0.64	0.00	10.89	0.00	71.99	0.00	16.48	0.00	0.00	0.00	0.00	0.00	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	1	10.00	0.42	0.00	9.04	0.00	72.89	100.00	17.65	0.00	5.26	0.00	0.00	10.00	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	0	0.00	3.50	0.00	21.59	0.00	42.42	0.00	32.48	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville, FL MSA ^^	0	0.00	1.50	0.00	16.46	0.00	60.49	0.00	21.56	0.00	0.00	0.00	0.00	0.00	0.00
Lakeland-Winter Haven, FL MSA ^^	0	0.00	0.00	0.00	15.08	0.00	63.15	0.00	21.77	0.00	0.00	0.00	0.00	0.00	0.00
Naples-Marco Island, FL MSA ^	0	0.00	0.00	0.00	0.00	0.00	41.09	0.00	58.91	0.00	0.00	0.00	0.00	0.00	0.00
North Port-Bradenton-Sarasota, FL MSA ^	2	20.00	0.30	0.00	16.98	0.00	56.00	0.00	26.72	100.00	5.41	0.00	0.00	0.00	9.52
Orlando-Kissimmee-Sanford, FL MSA ^	0	0.00	0.82	0.00	17.98	0.00	55.44	0.00	25.76	0.00	0.00	0.00	0.00	0.00	0.00
Palm Bay-Melbourne-Titusville, FL MSA ^^	1	10.00	1.12	0.00	17.43	100.00	53.48	0.00	27.97	0.00	4.17	0.00	25.00	0.00	0.00
Port St. Lucie, FL MSA ^^	0	0.00	1.47	0.00	18.90	0.00	58.33	0.00	21.30	0.00	0.00	0.00	0.00	0.00	0.00
Sebastian-Vero Beach, FL MSA ^^	0	0.00	0.00	0.00	14.95	0.00	65.22	0.00	19.84	0.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater, FL MSA ^	5	50.00	0.55	0.00	23.07	0.00	48.57	80.00	27.80	20.00	1.05	0.00	0.00	0.00	3.33
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	1	10.00	3.56	0.00	22.54	0.00	35.33	0.00	38.55	100.00	0.00	0.00	0.00	0.00	0.00
State Total ^^	10	100.00	1.40	0.00	18.28	10.00	51.92	50.00	28.39	40.00	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

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

Borrower Distribution: HOME PURCHASE		Geography: Florida								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	15,612	23.57	23.00	0.60	16.98	4.15	18.53	13.63	41.50	81.62	4.42	4.50	5.41	5.61	3.78
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	4,127	6.23	17.16	8.37	19.96	21.81	23.32	21.00	39.56	48.83	4.57	7.11	7.89	4.19	2.50
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	746	1.13	17.44	9.98	19.60	34.62	23.44	29.74	39.51	25.66	3.37	4.01	4.88	3.73	1.99
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	9,638	14.55	20.85	3.18	18.17	14.88	20.48	24.16	40.50	57.77	3.62	4.00	3.96	4.35	2.96
Jacksonville, FL MSA ^^	2,001	3.02	19.42	9.15	18.51	29.28	23.14	30.53	38.94	31.03	3.85	3.45	4.01	4.62	3.20
Lakeland-Winter Haven, FL MSA ^^	1,439	2.17	18.23	8.27	19.44	36.16	22.60	31.46	39.73	24.11	4.88	4.58	6.51	5.22	3.63
Naples-Marco Island, FL MSA ^	496	0.75	12.41	1.07	14.77	11.74	18.29	14.23	54.54	72.95	3.57	2.70	9.38	4.71	2.70
North Port-Bradenton-Sarasota, FL MSA ^	2,836	4.28	17.71	5.07	19.64	16.26	23.60	20.87	39.06	57.80	2.84	2.87	3.84	2.57	2.54
Orlando-Kissimmee-Sanford, FL MSA ^	10,768	16.25	18.74	6.10	18.84	19.95	22.70	25.39	39.72	48.56	4.15	5.31	5.24	4.47	2.99
Palm Bay-Melbourne-Titusville, FL MSA ^^	895	1.35	18.27	11.50	19.30	22.08	22.67	22.63	39.76	43.78	2.54	1.86	2.21	2.44	3.12
Port St. Lucie, FL MSA ^^	1,277	1.93	18.46	8.40	19.34	32.29	22.19	29.65	40.01	29.65	6.39	5.66	7.52	7.98	4.56
Sebastian-Vero Beach, FL MSA ^^	333	0.50	17.61	7.08	19.63	31.13	22.39	20.75	40.37	41.04	5.71	2.33	7.35	4.95	6.06
Tampa-St. Petersburg-Clearwater, FL MSA ^	9,569	14.44	18.87	5.40	19.12	19.10	22.01	24.68	40.01	50.82	3.63	4.00	3.84	3.75	3.35
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	6,508	9.82	19.86	4.25	18.56	14.83	20.60	21.25	40.98	59.67	4.25	4.32	4.62	5.12	3.62
State Total ^^	66,245	100.00	19.59	4.41	18.60	15.75	21.54	21.71	40.27	58.13	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 27.3% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state



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

Borrower Distribution: HOME IMPROVEMENT			Geography: Florida						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Miami-Miami Beach-Kendall, FL MD ^	665	24.44	23.00	1.15	16.98	9.46	18.53	18.91	41.50	70.49	2.70	0.00	0.00	2.31	3.33
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA ^	126	4.63	17.16	12.00	19.96	16.00	23.32	24.00	39.56	48.00	1.57	0.00	2.94	1.75	1.25
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	33	1.21	17.44	16.67	19.60	0.00	23.44	66.67	39.51	16.67	0.82	0.00	0.00	3.03	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	426	15.66	20.85	5.71	18.17	15.24	20.48	27.14	40.50	51.90	2.73	4.55	4.50	2.92	1.80
Jacksonville, FL MSA ^^	75	2.76	19.42	20.69	18.51	17.24	23.14	17.24	38.94	44.83	1.36	3.36	1.49	0.57	1.24
Lakeland-Winter Haven, FL MSA ^^	28	1.03	18.23	0.00	19.44	0.00	22.60	83.33	39.73	16.67	0.57	0.00	0.00	1.04	0.65
Naples-Marco Island, FL MSA ^	18	0.66	12.41	0.00	14.77	10.00	18.29	20.00	54.54	70.00	2.78	0.00	0.00	0.00	4.55
North Port-Bradenton-Sarasota, FL MSA ^	137	5.03	17.71	3.41	19.64	12.50	23.60	30.68	39.06	53.41	2.45	3.23	3.80	3.57	0.75
Orlando-Kissimmee-Sanford, FL MSA ^	392	14.41	18.74	7.69	18.84	13.85	22.70	28.21	39.72	50.26	1.73	2.53	3.31	0.42	1.64
Palm Bay-Melbourne-Titusville, FL MSA ^^	91	3.34	18.27	0.00	19.30	50.00	22.67	37.50	39.76	12.50	1.31	0.00	1.47	3.85	0.00
Port St. Lucie, FL MSA ^^	38	1.40	18.46	0.00	19.34	60.00	22.19	40.00	40.01	0.00	1.87	0.00	5.17	2.94	0.00
Sebastian-Vero Beach, FL MSA ^^	28	1.03	17.61	0.00	19.63	0.00	22.39	0.00	40.37	100.00	1.35	0.00	0.00	0.00	2.94
Tampa-St. Petersburg-Clearwater, FL MSA ^	355	13.05	18.87	3.88	19.12	18.53	22.01	26.72	40.01	50.86	0.78	0.00	0.00	1.15	1.05
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	309	11.36	19.86	9.22	18.56	18.44	20.60	20.57	40.98	51.77	2.83	5.00	3.64	2.36	2.43
State Total ^^	2,721	100.00	19.59	5.18	18.60	14.50	21.54	24.72	40.27	55.60	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 51.1% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Florida										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Miami-Miami Beach-Kendall, FL MD ^	14,899	20.48	23.00	1.75	16.98	7.03	18.53	18.08	41.50	73.15	7.15	2.49	6.84	8.05	7.34	
<b>Limited Review:</b>																
Cape Coral-Fort Myers, FL MSA ^	3,281	4.51	17.16	4.18	19.96	11.52	23.32	21.70	39.56	62.60	5.97	7.17	4.32	5.75	6.31	
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	921	1.27	17.44	9.42	19.60	20.64	23.44	24.85	39.51	45.09	4.67	5.41	5.41	4.05	4.59	
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	11,163	15.35	20.85	5.03	18.17	13.84	20.48	23.75	40.50	57.38	7.24	9.66	7.88	7.01	6.94	
Jacksonville, FL MSA ^^	2,739	3.77	19.42	7.44	18.51	19.86	23.14	24.64	38.94	48.06	3.25	3.49	3.85	3.15	3.02	
Lakeland-Winter Haven, FL MSA ^^	847	1.16	18.23	5.77	19.44	16.08	22.60	25.57	39.73	52.58	3.87	2.43	4.39	4.01	3.82	
Naples-Marco Island, FL MSA ^	770	1.06	12.41	3.46	14.77	9.09	18.29	14.07	54.54	73.38	6.55	7.55	7.46	6.12	6.52	
North Port-Bradenton-Sarasota, FL MSA ^	3,744	5.15	17.71	5.90	19.64	13.75	23.60	23.25	39.06	57.10	6.05	8.23	4.98	6.03	6.11	
Orlando-Kissimmee-Sanford, FL MSA ^	10,609	14.59	18.74	5.92	18.84	16.79	22.70	24.69	39.72	52.59	5.65	6.23	5.32	5.54	5.73	
Palm Bay-Melbourne-Titusville, FL MSA ^^	1,707	2.35	18.27	10.70	19.30	16.50	22.67	29.10	39.76	43.70	6.41	7.10	4.73	7.75	6.18	
Port St. Lucie, FL MSA ^^	1,116	1.53	18.46	6.15	19.34	14.90	22.19	22.72	40.01	56.24	7.40	7.29	7.97	6.82	7.50	
Sebastian-Vero Beach, FL MSA ^^	551	0.76	17.61	6.59	19.63	14.37	22.39	22.75	40.37	56.29	11.49	11.22	8.26	13.02	11.75	
Tampa-St. Petersburg-Clearwater, FL MSA ^	12,096	16.63	18.87	5.24	19.12	16.70	22.01	23.61	40.01	54.45	4.41	5.14	4.40	4.74	4.17	
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	8,289	11.40	19.86	5.31	18.56	15.82	20.60	22.11	40.98	56.76	7.49	10.42	8.17	7.47	7.07	
State Total ^^	72,732	100.00	19.59	4.82	18.60	13.79	21.54	22.44	40.27	58.95	N/A	N/A	N/A	N/A	N/A	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 33.9% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Florida			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Miami-Miami Beach-Kendall, FL MD ^	3,136	35.13	81.30	59.44	96.52	2.42	1.05	0.36	0.24
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA ^	101	1.13	82.60	11.88	87.13	6.93	5.94	0.18	0.05
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	54	0.60	84.11	44.44	96.30	1.85	1.85	0.15	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	1,360	15.24	82.57	56.62	96.40	1.99	1.62	0.25	0.21
Jacksonville, FL MSA ^^	111	1.24	80.84	9.01	83.78	4.50	11.71	0.20	0.00
Lakeland-Winter Haven, FL MSA ^^	88	0.99	82.81	62.50	95.45	2.27	2.27	0.06	0.08
Naples-Marco Island, FL MSA ^	43	0.48	77.82	4.65	88.37	6.98	4.65	0.35	0.14
North Port-Bradenton-Sarasota, FL MSA ^	314	3.52	83.38	39.81	95.86	2.55	1.59	0.20	0.00
Orlando-Kissimmee-Sanford, FL MSA ^	1,125	12.60	82.11	64.62	94.67	2.76	2.58	0.23	0.28
Palm Bay-Melbourne-Titusville, FL MSA ^^	215	2.41	82.58	68.84	94.88	4.19	0.93	0.12	0.10
Port St. Lucie, FL MSA ^^	168	1.88	85.00	64.88	97.62	1.19	1.19	0.33	0.31
Sebastian-Vero Beach, FL MSA ^^	43	0.48	82.97	58.14	88.37	11.63	0.00	0.25	0.36
Tampa-St. Petersburg-Clearwater, FL MSA ^	740	8.29	82.14	40.95	93.51	4.32	2.16	0.15	0.05
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	1,428	16.00	82.45	57.91	95.73	2.31	1.96	0.41	0.37
State Total ^^	8,926	100.00	82.18	56.03	95.50	2.70	1.80	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 31.14% of small loans to businesses originated and purchased by the bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Florida			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Miami-Miami Beach-Kendall, FL MD ^	0	0.00	95.79	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA ^	0	0.00	97.37	0.00	0.00	0.00	0.00	0.00	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	1	10.00	98.04	0.00	100.00	0.00	0.00	5.26	0.00
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	0	0.00	96.53	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville, FL MSA ^^	0	0.00	96.80	0.00	0.00	0.00	0.00	0.00	0.00
Lakeland-Winter Haven, FL MSA ^^	0	0.00	95.58	0.00	0.00	0.00	0.00	0.00	0.00
Naples-Marco Island, FL MSA ^	0	0.00	94.18	0.00	0.00	0.00	0.00	0.00	0.00
North Port-Bradenton-Sarasota, FL MSA ^	2	20.00	95.70	0.00	100.00	0.00	0.00	5.41	0.00
Orlando-Kissimmee-Sanford, FL MSA ^	0	0.00	95.94	0.00	0.00	0.00	0.00	0.00	0.00
Palm Bay-Melbourne-Titusville, FL MSA ^^	1	10.00	97.70	0.00	100.00	0.00	0.00	4.17	0.00
Port St. Lucie, FL MSA ^^	0	0.00	93.49	0.00	0.00	0.00	0.00	0.00	0.00
Sebastian-Vero Beach, FL MSA ^^	0	0.00	92.53	0.00	0.00	0.00	0.00	0.00	0.00
Tampa-St. Petersburg-Clearwater, FL MSA ^	5	50.00	96.73	80.00	20.00	60.00	20.00	1.05	0.00
West Palm Beach-Boca Raton-Boynton Beach, FL MD ^	1	10.00	95.23	100.00	100.00	0.00	0.00	0.00	0.00
State Total ^^	10	100.00	96.17	50.00	60.00	30.00	10.00	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 50.00% of small loans to farms originated and purchased by the bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: Florida									
January 1, 2007 to December 31, 2010									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Miami-Miami Beach-Kendall, FL MD	30	23,035	84	91,825	114	114,860	39.63%	3	14,723
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA	0	0	0	0	0	0	0.00%	0	0
Deltona-Daytona Beach-Ormond Beach, FL MSA	2	8,488	3	5,417	5	13,905	4.80%	1	9,624
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	5	1,436	24	6,387	29	7,823	2.70%	0	0
Jacksonville, FL MSA	13	15,198	16	721	29	15,919	5.49%	1	51
Lakeland-Winter Haven, FL MSA	2	447	2	18,030	4	18,477	6.38%	0	0
Naples-Marco Island, FL MSA	4	755	24	385	28	1,140	0.39%	0	0
North Port-Bradenton-Sarasota, FL MSA	2	4,532	12	6,489	14	11,021	3.80%	0	0
Orlando-Kissimmee-Sanford, FL MSA	22	36,444	46	36,881	68	73,325	25.30%	3	456
Palm Bay-Melbourne-Titusville, FL MSA	3	2,742	1	35	4	2,777	0.96%	0	0
Port St. Lucie-Fort Pierce, FL MSA	0	0	1	12	1	12	0.00%	0	0
Sebastian-Vero Beach, FL	3	1,148	1	1,611	4	2,759	0.95%	2	16
Tampa-St. Petersburg-Clearwater, FL MSA	15	3,437	94	12,065	109	15,502	5.35%	2	18,282
West Palm Beach-Boca Raton-Boynton Beach, FL MD	11	1,613	53	10,699	64	12,312	4.25%	1	12,300
	112	99,275	361	190,557	473	289,832	100.00%	13	55,452
State Total									
Statewide Investments with Potential to Benefit one or more AAs	13	13,054	22	67,390	35	80,444	N/A	1	2
Statewide Investments with no Potential to Benefit one or more AAs	0	0	4	123	4	123	N/A	0	0

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Florida																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Miami-Miami Beach-Kendall, FL MD ^	33.10	61	24.02	4.92	19.67	29.51	45.90	3	0	0	1	1	1	4.89	28.61	35.68	30.79
<b>Limited Review:</b>																	
Cape Coral-Fort Myers, FL MSA ^	0.59	2	0.79	0.00	0.00	100.00	0.00	1	0	0	0	1	0	1.95	17.89	61.13	19.03
Deltona-Daytona Beach-Ormond Beach, FL MSA ^^	0.33	2	0.79	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.99	15.06	69.38	14.57
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD ^	16.15	35	13.78	0.00	11.43	48.57	40.00	1	0	0	0	1	0	3.57	26.43	43.13	26.88
Jacksonville, FL MSA ^^	0.07	1	0.39	0.00	100.00	0.00	0.00	0	0	0	0	0	0	3.22	20.31	53.75	22.72
Lakeland-Winter Haven, FL MSA ^^	0.49	6	2.36	0.00	16.67	33.33	50.00	1	1	0	-1	1	0	0.51	19.53	58.13	21.83
Naples-Marco Island, FL MSA ^	1.13	2	0.79	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	36.93	63.07
North Port-Bradenton-Sarasota, FL MSA ^	2.14	8	3.15	0.00	12.50	75.00	12.50	1	2	0	0	-1	0	0.67	25.18	52.01	22.14
Orlando-Kissimmee-Sanford, FL MSA ^	12.96	45	17.72	0.00	22.22	44.44	33.33	3	1	0	0	1	1	1.63	22.82	48.22	27.33
Palm Bay-Melbourne-Titusville, FL MSA ^^	3.22	12	4.72	0.00	33.33	50.00	16.67	0	0	0	0	0	0	1.34	19.21	51.27	28.17
Port St. Lucie, FL MSA ^^	1.96	8	3.15	0.00	25.00	75.00	0.00	1	0	0	0	1	0	3.58	17.57	57.55	21.31
Sebastian-Vero Beach, FL MSA ^^	0.55	1	0.39	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	16.49	61.66	21.84
Tampa-St. Petersburg-Clearwater, FL MSA ^	3.79	32	12.60	3.13	18.75	31.25	46.88	2	0	0	0	0	2	2.35	24.27	46.05	27.32
West Palm Beach-Rosemead-Boynton Beach, FL MD	23.53	39	15.35	2.56	25.64	33.33	38.46	0	1	0	0	-1	0	4.21	29.32	33.88	32.37
<b>State Total</b>	<b>100.00</b>	<b>254</b>	<b>100.00</b>	<b>1.97</b>	<b>20.08</b>	<b>40.55</b>	<b>37.40</b>	<b>13</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2.84</b>	<b>23.98</b>	<b>46.35</b>	<b>26.81</b>

Demographic Data Source: 2000 Census

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 234 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		Georgia						Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Atlanta-Sandy Springs-Marietta, GA MSA	100.00	26,020	4,929,537	1,879	82,159	3	636	14	86,315	27,916	5,098,647	100.00
<b>State Total</b>	100.00	26,020	4,929,537	1,879	82,159	3	636	14	86,315	27,916	5,098,647	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	4,886	0	0	N/A

\* Deposit data as of June 30, 2010.

**Table 1. Other Products**

Lending Volume		Georgia										Evaluation Period: September 26, 2008 to December 31, 2010		
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Atlanta-Sandy Springs-Marietta, GA MSA	100.00	2	27,783	2	27,783	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
State Total	100.00	2	27,783	2	27,783	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.



**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	8,670	100.00	2.35	2.39	17.94	20.72	43.69	50.62	36.02	26.27	3.68	3.04	5.52	4.07	2.38
State Total	8,670	100.00	2.35	2.39	17.94	20.72	43.69	50.62	36.02	26.27	3.68	3.04	5.52	4.07	2.38

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	353	100.00	2.35	1.42	17.94	12.18	43.69	43.63	36.02	42.78	1.48	0.00	0.44	1.21	2.16
State Total	353	100.00	2.35	1.42	17.94	12.18	43.69	43.63	36.02	42.78	1.48	0.00	0.44	1.21	2.16

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	16,922	100.00	2.35	1.49	17.94	10.83	43.69	40.63	36.02	47.06	4.36	3.08	3.73	4.33	4.58
State Total	16,922	100.00	2.35	1.49	17.94	10.83	43.69	40.63	36.02	47.06	4.36	3.08	3.73	4.33	4.58

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	75	100.00	11.41	2.67	31.17	24.00	31.09	40.00	26.33	33.33	0.00	0.00	0.00	0.00	0.00
State Total	75	100.00	11.41	2.67	31.17	24.00	31.09	40.00	26.33	33.33	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010				
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
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	1,879	100.00	4.02	4.63	18.31	14.26	39.74	41.41	37.93	39.70	0.15	0.18	0.12	0.13	0.18
State Total	1,879	100.00	4.02	4.63	18.31	14.26	39.74	41.41	37.93	39.70	0.15	0.18	0.12	0.13	0.18

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010					
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
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	3	100.00	1.62	0.00	17.56	0.00	48.40	33.33	32.42	66.67	0.35	0.00	0.00	0.72	0.00
State Total	3	100.00	1.62	0.00	17.56	0.00	48.40	33.33	32.42	66.67	0.35	0.00	0.00	0.72	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Georgia										Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Atlanta-Sandy Springs-Marietta, GA MSA	8,670	100.00	20.00	23.39	18.13	33.83	22.32	20.60	39.56	22.18	3.08	3.71	3.46	3.05	2.32	
State Total	8,670	100.00	20.00	23.39	18.13	33.83	22.32	20.60	39.56	22.18	3.08	3.71	3.46	3.05	2.32	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 25.2% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: Georgia								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	353	100.00	20.00	7.55	18.13	16.04	22.32	28.30	39.56	48.11	1.56	0.82	1.39	1.60	1.81
State Total	353	100.00	20.00	7.55	18.13	16.04	22.32	28.30	39.56	48.11	1.56	0.82	1.39	1.60	1.81

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 70.0% of loans originated and purchased by bank.



**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Georgia										Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Atlanta-Sandy Springs-Marietta, GA MSA	16,922	100.00	20.00	7.73	18.13	18.62	22.32	24.14	39.56	49.51	4.92	5.05	4.98	4.86	4.91	
State Total	16,922	100.00	20.00	7.73	18.13	18.62	22.32	24.14	39.56	49.51	4.92	5.05	4.98	4.86	4.91	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 26.6% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Georgia			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Atlanta-Sandy Springs-Marietta, GA MSA	1,879	100.00	80.60	75.52	98.14	1.01	0.85	0.15	0.07
State Total	1,879	100.00	80.60	75.52	98.14	1.01	0.85	0.15	0.07

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 13.25% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Georgia			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Atlanta-Sandy Springs-Marietta, GA MSA	3	100.00	95.66	66.67	33.33	0.00	66.67	0.35	0.00
State Total	3	100.00	95.66	66.67	33.33	0.00	66.67	0.35	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 33.33% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Georgia				September 26, 2008 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments Evaluation Period:			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Atlanta-Sandy Springs-Marietta, GA	34	51,209	99	25,172	133	76,381	100.00%	5	5,408
<b>State Total</b>	34	51,209	99	25,172	133	76,381	100.00%	5	5,408
Statewide Investments with Potential to Benefit one or more AAs	22	11,461	6	3,860	28	15,321	N/A	1	2
Statewide Investments with no Potential to Benefit one or more AAs	1	2,918	7	243	8	3,161	N/A	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Georgia																	
Evaluation Period: September 26, 2008 to December 31, 2010																	
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
<b>Full Review:</b>																	
Atlanta-Sandy Springs-Marietta, GA MSA	100.00	62	100.00	4.84	17.74	33.87	43.55	8	1	-1	0	1	7	5.72	23.65	40.60	29.99
State Total	100.00	62	100.00	4.84	17.74	33.87	43.55	8	1	-1	0	1	7	5.72	23.65	40.60	29.99

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 55 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		Idaho						Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Boise City-Nampa, ID MSA	53.89	3,714	585,112	294	10,739	0	0	0	0	4,008	595,851	61.34
<b>Limited Review:</b>												
Coeur d'Alene, ID MSA	15.77	1,129	217,929	44	2,627	0	0	0	0	1,173	220,556	12.43
Idaho Falls, ID MSA	11.56	832	127,171	27	833	1	15	0	0	860	128,019	10.38
Pocatello, ID MSA	8.69	637	92,461	9	413	0	0	0	0	646	92,874	1.97
Non-Met ID	10.10	701	101,182	49	1,833	1	350	0	0	751	103,365	13.88
State Total	100.00	7,013	1,123,855	423	16,445	2	365	0	0	7,438	1,140,665	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	14	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Idaho										Evaluation Period: September 26, 2008 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	61.34	
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.43	
Idaho Falls, ID MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.38	
Pocatello, ID MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.97	
Non-Met ID	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13.88	
State Total	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Idaho								Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	1,298	46.74	0.81	0.15	16.94	14.33	48.94	54.47	33.31	31.05	4.72	0.00	5.01	5.60	3.48
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	537	19.34	0.00	0.00	5.20	1.68	77.44	88.27	17.36	10.06	7.38	0.00	5.26	7.88	4.03
Idaho Falls, ID MSA	357	12.86	0.00	0.00	10.92	8.12	67.32	72.55	21.76	19.33	6.73	0.00	1.75	7.00	7.59
Pocatello, ID MSA	301	10.84	0.00	0.00	18.36	20.60	52.28	44.85	29.37	34.55	9.57	0.00	9.45	8.52	11.28
None of the MSA	284	10.23	0.00	0.00	5.93	5.63	73.05	75.00	21.03	19.37	6.62	0.00	3.43	7.40	5.79
State Total	2,777	100.00	0.43	0.07	13.41	10.88	58.24	64.39	27.92	24.67	5.84	0.00	5.33	6.62	4.56

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Idaho								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	74	54.81	0.81	0.00	16.94	6.76	48.94	45.95	33.31	47.30	2.73	0.00	0.00	2.58	3.93
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	15	11.11	0.00	0.00	5.20	0.00	77.44	86.67	17.36	13.33	1.23	0.00	0.00	1.63	0.00
Idaho Falls, ID MSA	15	11.11	0.00	0.00	10.92	0.00	67.32	86.67	21.76	13.33	2.53	0.00	0.00	3.01	1.79
Pocatello, ID MSA	6	4.44	0.00	0.00	18.36	16.67	52.28	33.33	29.37	50.00	4.04	0.00	6.67	2.56	4.44
Portland, ID MSA	25	18.52	0.00	0.00	5.93	16.00	73.05	44.00	21.03	40.00	5.97	0.00	16.67	3.57	7.89
State Total	135	100.00	0.43	0.00	13.41	7.41	58.24	54.07	27.92	38.52	2.75	0.00	1.95	2.47	3.52

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Idaho								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	2,336	57.11	0.81	0.13	16.94	9.16	48.94	43.66	33.31	47.05	4.92	3.85	4.66	4.70	5.21
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	575	14.06	0.00	0.00	5.20	1.91	77.44	75.83	17.36	22.26	3.23	0.00	2.00	3.16	3.63
Idaho Falls, ID MSA	458	11.20	0.00	0.00	10.92	4.80	67.32	63.54	21.76	31.66	4.08	0.00	4.28	3.36	6.18
Portland, ID MSA	330	8.07	0.00	0.00	18.36	10.91	52.28	47.27	29.37	41.82	5.25	0.00	4.01	5.29	5.54
Pocatello, ID MSA	391	9.56	0.00	0.00	5.93	9.21	73.05	67.77	21.03	23.02	5.25	0.00	7.17	5.09	4.98
State Total	4,090	100.00	0.43	0.07	13.41	7.80	58.24	53.01	27.92	39.12	4.61	3.85	4.67	4.24	5.16

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Idaho								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	6	54.55	1.79	0.00	38.62	0.00	32.77	66.67	26.82	33.33	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	2	18.18	0.00	0.00	24.85	0.00	61.21	100.00	13.94	0.00	0.00	0.00	0.00	0.00	0.00
Idaho Falls, ID MSA	2	18.18	0.00	0.00	36.24	0.00	53.48	100.00	10.29	0.00	0.00	0.00	0.00	0.00	0.00
Pocatello, ID MSA	0	0.00	0.00	0.00	48.34	0.00	43.72	0.00	7.95	0.00	0.00	0.00	0.00	0.00	0.00
None	1	9.09	0.00	0.00	9.14	0.00	64.24	100.00	26.62	0.00	0.00	0.00	0.00	0.00	0.00
State Total	11	100.00	0.97	0.00	33.18	0.00	43.86	81.82	21.98	18.18	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Idaho						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	294	69.50	0.81	1.70	22.33	28.23	42.47	35.71	34.39	34.35	0.16	1.14	0.16	0.17	0.13
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	44	10.40	0.00	0.00	12.50	13.64	72.69	79.55	14.81	6.82	0.18	0.00	0.25	0.16	0.20
Idaho Falls, ID MSA	27	6.38	0.00	0.00	17.98	25.93	60.33	40.74	21.69	33.33	0.10	0.00	0.28	0.04	0.11
Pocatello, ID MSA	9	2.13	0.00	0.00	31.54	44.44	45.74	44.44	22.72	11.11	0.24	0.00	0.37	0.30	0.00
None/Not MSA	49	11.58	0.00	0.00	12.46	2.04	67.84	91.84	19.71	6.12	0.32	0.00	0.33	0.41	0.00
<b>State Total</b>	<b>423</b>	<b>100.00</b>	<b>0.45</b>	<b>1.18</b>	<b>19.90</b>	<b>23.88</b>	<b>52.00</b>	<b>47.28</b>	<b>27.65</b>	<b>27.66</b>	<b>0.17</b>	<b>1.14</b>	<b>0.22</b>	<b>0.19</b>	<b>0.12</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Idaho						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	0	0.00	0.29	0.00	20.35	0.00	58.93	0.00	20.43	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	0	0.00	0.00	0.00	4.44	0.00	80.37	0.00	15.19	0.00	0.00	0.00	0.00	0.00	0.00
Idaho Falls, ID MSA	1	50.00	0.00	0.00	3.57	0.00	81.96	100.00	14.46	0.00	0.26	0.00	0.00	0.28	0.00
	0	0.00	0.00	0.00	7.43	0.00	74.80	0.00	17.77	0.00	0.00	0.00	0.00	0.00	0.00
Pocatello, ID MSA	1	50.00	0.00	0.00	8.21	0.00	77.97	100.00	13.82	0.00	0.15	0.00	0.00	0.17	0.00
State Total	2	100.00	0.15	0.00	13.46	0.00	68.66	100.00	17.72	0.00	0.13	0.00	0.00	0.16	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Idaho								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	1,298	46.74	17.91	17.65	19.17	27.81	23.63	25.03	39.29	29.52	4.16	4.21	3.80	3.94	4.69
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	537	19.34	17.20	5.95	19.03	36.90	25.04	34.23	38.73	22.92	4.62	3.03	5.23	6.18	3.09
Idaho Falls, ID MSA	357	12.86	18.07	7.47	18.91	32.47	23.84	32.79	39.18	27.27	6.86	4.35	7.43	8.29	5.77
Pocatello, ID MSA	301	10.84	19.76	13.09	18.53	33.45	22.10	25.45	39.62	28.00	10.52	9.84	11.62	10.10	10.09
None of the MSA	284	10.23	16.82	8.04	18.09	29.15	24.03	29.65	41.06	33.17	4.24	2.73	4.21	4.27	4.51
State Total	2,777	100.00	17.85	12.66	18.91	30.88	23.75	28.20	39.48	28.25	4.99	4.50	5.04	5.30	4.90

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 26.1% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Idaho								Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	74	54.81	17.91	6.45	19.17	12.90	23.63	29.03	39.29	51.61	2.85	1.59	2.84	2.00	3.70
<b>Limited Review:</b>															
Coeur d'Alene, ID MSA	15	11.11	17.20	0.00	19.03	12.50	25.04	87.50	38.73	0.00	1.26	0.00	1.41	4.23	0.00
Idaho Falls, ID MSA	15	11.11	18.07	11.11	18.91	22.22	23.84	33.33	39.18	33.33	2.56	0.00	5.13	2.38	1.83
Portland, ID MSA	6	4.44	19.76	0.00	18.53	20.00	22.10	0.00	39.62	80.00	3.23	0.00	4.76	0.00	4.76
State Total	135	100.00	17.85	5.71	18.91	18.57	23.75	32.86	39.48	42.86	2.78	1.89	3.82	2.56	2.60

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 48.1% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Idaho										Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Boise City-Nampa, ID MSA	2,336	57.11	17.91	9.43	19.17	20.62	23.63	25.12	39.29	44.83	5.54	5.84	5.93	5.43	5.39	
<b>Limited Review:</b>																
Coeur d'Alene, ID MSA	575	14.06	17.20	5.37	19.03	17.07	25.04	29.02	38.73	48.54	3.70	4.78	3.61	4.28	3.33	
Idaho Falls, ID MSA	458	11.20	18.07	7.71	18.91	18.86	23.84	23.14	39.18	50.29	4.72	6.18	4.73	4.39	4.71	
Portland, ID MSA	330	8.07	19.76	6.67	18.53	21.00	22.10	30.67	39.62	41.67	5.80	5.78	5.80	5.38	6.03	
Portland, OR MSA	391	9.56	16.82	3.05	18.09	19.32	24.03	28.14	41.06	49.49	6.21	5.22	8.51	6.16	5.70	
State Total	4,090	100.00	17.85	7.77	18.91	19.84	23.75	26.28	39.48	46.12	5.21	5.72	5.57	5.16	5.03	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 26.7% of loans originated and purchased by bank.



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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Idaho			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	294	69.50	82.32	74.49	97.62	1.70	0.68	0.16	0.07
<b>Limited Review:</b>									
Coeur d'Alene, ID MSA	44	10.40	82.07	68.18	93.18	0.00	6.82	0.18	0.08
Idaho Falls, ID MSA	27	6.38	80.32	59.26	100.00	0.00	0.00	0.10	0.00
None	9	2.13	76.16	44.44	100.00	0.00	0.00	0.24	0.00
Portland, ID MSA	49	11.58	78.44	59.18	93.88	6.12	0.00	0.32	0.08
State Total	423	100.00	81.19	70.45	96.93	1.89	1.18	0.17	0.06

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 20.09% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Idaho			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	0	0.00	95.96	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Coeur d'Alene, ID MSA	0	0.00	97.66	0.00	0.00	0.00	0.00	0.00	0.00
Idaho Falls, ID MSA	1	50.00	94.11	0.00	100.00	0.00	0.00	0.26	0.00
None	0	0.00	94.43	0.00	0.00	0.00	0.00	0.00	0.00
Pocatello, ID MSA	1	50.00	95.03	0.00	0.00	0.00	100.00	0.15	0.00
State Total	2	100.00	95.59	0.00	50.00	0.00	50.00	0.13	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 50.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Idaho				September 26, 2008 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	5	319	14	1,486	19	1,805	33.62%	0	0
<b>Limited Review:</b>									
Coeur d'Alene, ID MSA	3	414	2	740	5	1,154	21.49%	0	0
Idaho Falls, ID MSA	0	0	1	2,189	1	2,189	40.77%	0	0
Pocatello, ID MSA	0	0	2	4	2	4	0.07%	0	0
Non-Metro - Idaho	4	217	0	0	4	217	4.04%	0	0
<b>Total</b>	<b>12</b>	<b>950</b>	<b>19</b>	<b>4,419</b>	<b>31</b>	<b>5,369</b>	<b>100.00%</b>	<b>0</b>	<b>0</b>
Statewide Investments with Potential to Benefit one or more AAs	0	0	8	1,640	8	1,640	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	0	0	0	0	N/A	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Idaho																	
Evaluation Period: September 26, 2008 to December 31, 2010																	
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
<b>Full Review:</b>																	
Boise City-Nampa, ID MSA	61.34	14	63.64	0.00	35.71	28.57	35.71	0	0	0	0	0	0	1.56	20.97	47.20	30.27
<b>Limited Review:</b>																	
Coeur d'Alene, ID MSA	12.43	2	9.09	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	7.82	76.03	16.15
Idaho Falls, ID MSA	10.38	2	9.09	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	13.54	66.55	19.91
Pocatello, ID MSA	1.97	1	4.55	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	21.77	51.13	27.10
Non-Metro ID	13.88	3	13.64	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	7.19	74.25	18.55
<b>State Total</b>	<b>100.00</b>	<b>22</b>	<b>100.00</b>	<b>0.00</b>	<b>36.36</b>	<b>40.91</b>	<b>22.73</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.82</b>	<b>16.59</b>	<b>57.23</b>	<b>25.36</b>

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 22 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		Illinois						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Rockford, IL MSA	23.59	2,745	367,257	358	81,001	0	0	5	3,788	3,108	452,046	35.43
<b>Limited Review:</b>												
Bloomington-Normal, IL MSA	13.02	1,616	255,148	99	11,436	0	0	1	4,800	1,716	271,384	8.71
Champaign-Urbana, IL MSA	20.91	2,639	364,381	110	10,486	1	250	5	16,466	2,755	391,583	13.49
Davenport-Moline-Rock Island, IA-IL MSA	8.17	1,032	105,843	44	5,980	0	0	0	0	1,076	111,823	3.23
Peoria, IL MSA	26.17	3,260	421,534	181	26,681	1	24	6	25,932	3,448	474,171	11.23
Springfield, IL MSA	8.14	950	112,041	114	17,695	6	931	2	360	1,072	131,027	27.91
<b>State Total</b>	<b>100.00</b>	<b>12,242</b>	<b>1,626,204</b>	<b>906</b>	<b>153,279</b>	<b>8</b>	<b>1,205</b>	<b>19</b>	<b>51,346</b>	<b>13,175</b>	<b>1,832,034</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	22	60,019	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	2,790	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Illinois										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Rockford, IL MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	35.43	
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.71	
Champaign-Urbana, IL MSA	68.49	1	828	1	828	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13.49	
Davenport-Moline-Rock Island, IA-IL MSA	21.42	1	259	1	259	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.23	
Peoria, IL MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	11.23	
Springfield, IL MSA	10.09	1	122	1	122	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	27.91	
<b>State Total</b>	<b>100.00</b>	<b>3</b>	<b>1,209</b>	<b>3</b>	<b>1,209</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>100.00</b>	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	932	16.29	1.40	0.86	14.80	11.27	59.49	64.06	24.30	23.82	4.18	0.00	3.56	4.74	3.19
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	649	11.34	0.00	0.15	21.24	16.95	55.27	52.08	23.49	30.82	6.49	0.00	4.64	7.20	6.69
Champaign-Urbana, IL MSA	1,522	26.60	0.73	0.13	14.97	16.29	61.63	64.26	22.67	19.32	12.58	0.00	15.64	14.15	7.03
Davenport-Moline-Rock Island, IA-IL MSA	518	9.05	0.94	1.16	13.36	17.95	71.89	70.66	13.82	10.23	4.45	3.45	4.43	4.59	3.77
Peoria, IL MSA	1,722	30.09	3.11	0.75	9.80	7.26	66.51	69.86	20.59	22.13	9.79	0.00	10.09	11.00	7.08
	379	6.62	2.43	1.32	19.13	11.61	44.75	55.41	33.69	31.66	2.67	2.70	1.35	3.87	1.89
Springfield, IL MSA	5,722	100.00	1.71	0.61	14.53	12.67	60.98	64.52	22.78	22.20	6.83	1.18	6.39	7.88	4.86
State Total															

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	57	24.68	1.40	1.75	14.80	7.02	59.49	66.67	24.30	24.56	0.76	0.00	0.00	0.70	1.12
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	29	12.55	0.00	0.00	21.24	10.34	55.27	55.17	23.49	34.48	1.29	0.00	2.08	1.32	0.91
Champaign-Urbana, IL MSA	32	13.85	0.73	0.00	14.97	12.50	61.63	62.50	22.67	25.00	0.46	0.00	0.00	0.64	0.00
Davenport-Moline-Rock Island, IA-IL MSA	25	10.82	0.94	0.00	13.36	16.00	71.89	60.00	13.82	24.00	0.19	0.00	0.60	0.13	0.00
Peoria, IL MSA	53	22.94	3.11	5.66	9.80	7.55	66.51	56.60	20.59	30.19	0.00	0.00	0.00	0.00	0.00
	35	15.15	2.43	5.71	19.13	20.00	44.75	37.14	33.69	37.14	0.42	0.00	2.27	0.00	0.35
Springfield, IL MSA	231	100.00	1.71	2.60	14.53	11.26	60.98	57.14	22.78	29.00	0.41	0.00	0.85	0.31	0.44
State Total															

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	1,748	27.87	1.40	0.51	14.80	8.87	59.49	57.21	24.30	33.41	2.57	0.00	2.90	2.54	2.57
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	933	14.88	0.00	0.00	21.24	16.72	55.27	43.19	23.49	40.09	3.62	0.00	3.09	3.41	4.05
Champaign-Urbana, IL MSA	1,084	17.28	0.73	0.28	14.97	10.24	61.63	60.70	22.67	28.78	3.64	3.85	3.95	3.64	3.53
Davenport-Moline-Rock Island, IA-IL MSA	489	7.80	0.94	1.02	13.36	9.82	71.89	74.44	13.82	14.72	2.07	5.88	1.07	2.23	1.82
Peoria, IL MSA	1,485	23.68	3.11	0.94	9.80	7.54	66.51	62.63	20.59	28.89	2.70	2.99	1.71	2.75	2.77
	533	8.50	2.43	1.88	19.13	14.26	44.75	41.65	33.69	42.21	1.32	2.00	2.64	1.43	1.06
Springfield, IL MSA	6,272	100.00	1.71	0.65	14.53	10.49	60.98	57.03	22.78	31.82	2.58	2.71	2.61	2.63	2.49
State Total															

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	8	47.06	10.01	0.00	25.92	37.50	53.34	50.00	10.74	12.50	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	5	29.41	2.12	0.00	36.51	0.00	54.30	100.00	7.07	0.00	0.00	0.00	0.00	0.00	0.00
Champaign-Urbana, IL MSA	1	5.88	17.24	0.00	44.18	0.00	23.44	100.00	15.14	0.00	0.00	0.00	0.00	0.00	0.00
Davenport-Moline-Rock Island, IA-IL MSA	0	0.00	3.67	0.00	23.85	0.00	67.62	0.00	4.86	0.00	0.00	0.00	0.00	0.00	0.00
Peoria, IL MSA	0	0.00	14.71	0.00	14.83	0.00	44.83	0.00	25.63	0.00	0.00	0.00	0.00	0.00	0.00
	3	17.65	11.83	66.67	41.06	0.00	23.54	0.00	23.57	33.33	0.00	0.00	0.00	0.00	0.00
Springfield, IL MSA	17	100.00	11.14	11.76	31.05	17.65	42.57	58.82	15.24	11.76	0.00	0.00	0.00	0.00	0.00
State Total															

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
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
<b>Full Review:</b>															
Rockford, IL MSA	358	39.73	3.40	6.15	15.22	19.55	55.87	59.78	25.51	14.53	0.98	2.66	0.99	1.14	0.46
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	99	10.99	0.54	0.00	22.40	22.22	59.34	58.59	17.72	19.19	0.41	0.00	0.49	0.45	0.27
Champaign-Urbana, IL MSA	105	11.65	3.93	2.86	22.25	24.76	53.74	54.29	18.25	18.10	0.26	0.00	0.52	0.19	0.26
Davenport-Moline-Rock Island, IA-IL MSA	44	4.88	3.87	20.45	19.95	13.64	65.59	43.18	10.59	22.73	0.20	0.56	0.29	0.11	0.28
Peoria, IL MSA	181	20.09	7.82	8.84	11.49	13.26	58.60	49.72	22.09	28.18	0.54	0.21	1.04	0.47	0.62
	114	12.65	7.80	7.89	23.49	27.19	35.38	21.05	33.32	43.86	0.51	0.33	0.64	0.35	0.60
Springfield, IL MSA	901	100.00	4.98	6.55	18.07	19.87	54.71	51.28	21.97	22.31	0.53	0.60	0.66	0.51	0.47
State Total															

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Rockford, IL MSA	0	0.00	0.45	0.00	6.82	0.00	60.22	0.00	32.51	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	0	0.00	0.00	0.00	5.61	0.00	72.72	0.00	21.67	0.00	0.00	0.00	0.00	0.00	0.00
Champaign-Urbana, IL MSA	1	12.50	0.30	0.00	3.76	100.00	89.16	0.00	6.77	0.00	0.00	0.00	0.00	0.00	0.00
Davenport-Moline-Rock Island, IA-IL MSA	0	0.00	0.16	0.00	4.07	0.00	86.58	0.00	9.19	0.00	0.00	0.00	0.00	0.00	0.00
Peoria, IL MSA	1	12.50	0.38	0.00	2.34	0.00	82.62	100.00	14.67	0.00	0.12	0.00	0.00	0.13	0.00
Springfield, IL MSA	6	75.00	1.29	0.00	7.75	83.33	63.57	16.67	27.39	0.00	0.61	0.00	33.33	0.00	0.00
State Total	8	100.00	0.39	0.00	4.49	75.00	78.43	25.00	16.68	0.00	0.09	0.00	2.44	0.05	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	932	16.29	18.51	13.26	18.84	30.54	24.28	28.59	38.36	27.62	4.38	4.16	5.03	4.83	3.18
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	649	11.34	17.41	11.83	18.87	27.10	26.57	29.39	37.15	31.68	5.46	3.22	5.96	6.33	5.47
Champaign-Urbana, IL MSA	1,522	26.60	17.76	11.19	19.22	26.16	25.12	26.08	37.90	36.57	8.57	9.73	10.85	9.59	5.60
Davenport-Moline-Rock Island, IA-IL MSA	518	9.05	19.65	18.94	19.61	31.37	24.91	26.09	35.83	23.60	2.58	2.76	2.54	2.34	2.77
Peoria, IL MSA	1,722	30.09	18.96	18.18	18.78	31.47	24.11	26.66	38.15	23.68	6.82	7.54	7.65	7.64	4.89
	379	6.62	18.52	19.31	18.90	28.57	24.00	29.73	38.58	22.39	1.40	1.27	1.50	1.79	1.07
Springfield, IL MSA	5,722	100.00	18.60	14.78	19.00	29.20	24.62	27.33	37.78	28.69	4.99	4.76	5.62	5.58	3.91
State Total															

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 23.1% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	57	24.68	18.51	6.25	18.84	37.50	24.28	25.00	38.36	31.25	0.83	0.00	0.81	0.00	1.70
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	29	12.55	17.41	11.54	18.87	19.23	26.57	30.77	37.15	38.46	1.36	0.00	1.69	1.45	1.63
Champaign-Urbana, IL MSA	32	13.85	17.76	12.00	19.22	16.00	25.12	32.00	37.90	40.00	0.47	0.00	1.11	0.00	0.63
Davenport-Moline-Rock Island, IA-IL MSA	25	10.82	19.65	14.29	19.61	38.10	24.91	19.05	35.83	28.57	0.20	0.00	0.79	0.00	0.00
Peoria, IL MSA	53	22.94	18.96	13.51	18.78	18.92	24.11	37.84	38.15	29.73	0.00	0.00	0.00	0.00	0.00
Springfield, IL MSA	35	15.15	18.52	15.63	18.90	25.00	24.00	34.38	38.58	25.00	0.43	0.00	0.83	1.16	0.00
State Total	231	100.00	18.60	11.64	19.00	26.46	24.62	30.16	37.78	31.75	0.43	0.00	0.76	0.34	0.45

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 18.2% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Illinois								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rockford, IL MSA	1,748	27.87	18.51	8.61	18.84	19.90	24.28	30.56	38.36	40.93	2.80	2.75	2.49	3.14	2.73
<b>Limited Review:</b>															
Bloomington-Normal, IL MSA	933	14.88	17.41	5.59	18.87	14.04	26.57	28.32	37.15	52.05	3.88	2.44	2.84	3.91	4.44
Champaign-Urbana, IL MSA	1,084	17.28	17.76	5.65	19.22	19.05	25.12	26.91	37.90	48.39	3.54	3.01	4.00	3.56	3.42
Davenport-Moline-Rock Island, IA-IL MSA	489	7.80	19.65	12.29	19.61	20.39	24.91	25.80	35.83	41.52	2.22	3.61	1.82	2.33	2.01
Peoria, IL MSA	1,485	23.68	18.96	8.69	18.78	20.94	24.11	29.38	38.15	40.99	2.65	2.85	2.88	2.40	2.69
	533	8.50	18.52	10.47	18.90	18.37	24.00	29.53	38.58	41.63	1.18	1.18	1.63	1.44	0.89
Springfield, IL MSA	6,272	100.00	18.60	8.09	19.00	19.00	24.62	28.84	37.78	44.07	2.63	2.61	2.57	2.72	2.60
State Total															

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.2% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Illinois			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Rockford, IL MSA	358	39.51	76.73	32.12	53.63	17.60	28.77	0.98	0.86
<b>Limited Review:</b>									
Bloomington-Normal, IL MSA	99	10.93	73.19	25.25	82.83	6.06	11.11	0.41	0.00
Champaign-Urbana, IL MSA	110	12.14	72.79	28.18	76.36	14.55	9.09	0.25	0.00
Davenport-Moline-Rock Island, IA-IL MSA	44	4.86	74.88	34.09	70.45	15.91	13.64	0.20	0.00
Peoria, IL MSA	181	19.98	73.52	16.02	71.27	8.84	19.89	0.54	0.07
	114	12.58	73.37	31.58	71.05	8.77	20.18	0.51	0.12
Springfield, IL MSA	906	100.00	74.26	27.70	66.11	13.02	20.86	0.53	0.18
State Total									

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 33.22% of small loans to businesses originated and purchased by the bank.



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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Illinois			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Rockford, IL MSA	0	0.00	97.09	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Bloomington-Normal, IL MSA	0	0.00	97.65	0.00	0.00	0.00	0.00	0.00	0.00
Champaign-Urbana, IL MSA	1	12.50	98.42	0.00	0.00	100.00	0.00	0.00	0.00
Davenport-Moline-Rock Island, IA-IL MSA	0	0.00	98.56	0.00	0.00	0.00	0.00	0.00	0.00
Peoria, IL MSA	1	12.50	98.32	0.00	100.00	0.00	0.00	0.12	0.00
	6	75.00	97.55	66.67	33.33	66.67	0.00	0.61	1.03
Springfield, IL MSA	8	100.00	98.06	50.00	37.50	62.50	0.00	0.09	0.06
State Total									

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 25.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Illinois				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Rockford, IL MSA	4	508	33	2,606	37	3,114	13.78%	0	0
<b>Limited Review:</b>									
Bloomington-Normal, IL MSA	3	3,000	2	6	5	3,006	13.30%	0	0
Champaign-Urbana, IL MSA	3	652	1	9,609	4	10,261	45.41%	1	1,105
Davenport-Moline-Rock Island, IA-IL MSA	9	1,148	2	25	11	1,173	5.19%	0	0
Peoria, IL MSA	8	2,810	9	1,552	17	4,362	19.31%	0	0
Springfield, IL MSA	1	458	10	220	11	678	3.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	28	8,576	57	14,018	85	22,594	100.00%	1	1,105
Statewide Investments with no Potential to Benefit one or more AAs	37	21,830	19	6,673	56	28,503	N/A	2	7
Statewide Investments with no Potential to Benefit one or more AAs	2	3,667	12	9,712	14	13,379	N/A	2	158

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Illinois																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Rockford, IL MSA	35.43	7	29.17	14.29	28.57	42.86	14.29	0	0	0	0	0	0	3.72	19.51	55.62	21.15
<b>Limited Review:</b>																	
Bloomington-Normal, IL MSA	8.71	3	12.50	0.00	66.67	33.33	0.00	0	0	0	0	0	0	5.16	22.68	53.48	18.67
Champaign-Urbana, IL MSA	13.49	3	12.50	0.00	33.33	33.33	0.00	0	0	0	0	0	0	5.29	24.52	52.43	17.67
Davenport-Moline-Rock Island, IA-IL MSA	3.23	2	8.33	50.00	50.00	0.00	0.00	0	0	0	0	0	0	2.06	16.68	68.80	12.46
Peoria, IL MSA	11.23	5	20.83	20.00	20.00	40.00	20.00	0	0	0	0	0	0	5.89	12.34	61.99	19.78
Springfield, IL MSA	27.91	4	16.67	25.00	50.00	0.00	25.00	0	0	0	0	0	0	5.05	22.27	42.31	30.37
State Total	100.00	24	100.00	16.67	37.50	29.17	12.50	0	0	0	0	0	0	4.57	18.72	56.66	20.03

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Indiana						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Indianapolis-Carmel, IN MSA	63.81	24,114	3,879,457	2,413	307,150	5	1,131	30	120,091	26,562	4,307,829	72.81
<b>Limited Review:</b>												
Bloomington, IN MSA	3.21	1,192	167,207	143	18,651	0	0	1	4,400	1,336	190,258	3.18
Elkhart-Goshen, IN MSA	4.57	1,610	206,515	283	75,116	2	83	6	10,400	1,901	292,114	6.38
Fort Wayne, IN MSA	11.25	4,131	507,896	541	85,336	11	1,161	2	2,550	4,685	596,943	7.93
Lafayette, IN MSA	3.19	1,211	150,541	91	12,150	20	4,525	5	10,223	1,327	177,439	3.81
Michigan City-La Porte, IN MSA	2.29	915	148,109	37	4,017	2	70	0	0	954	152,196	0.30
South Bend, IN MSA	2.29	852	84,712	94	12,925	1	80	5	18,850	952	116,567	1.42
Muncie, IN MSA	3.68	1,395	167,740	136	27,266	0	0	0	0	1,531	195,006	0.67
Non-Metro IN	5.72	2,171	215,180	162	36,511	47	6,810	0	0	2,380	258,501	3.50
<b>State Total</b>	<b>100.00</b>	<b>37,591</b>	<b>5,527,357</b>	<b>3,900</b>	<b>579,122</b>	<b>88</b>	<b>13,860</b>	<b>49</b>	<b>166,514</b>	<b>41,628</b>	<b>6,286,853</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	5	606,950	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	2,000	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Indiana										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	72.81	
<b>Limited Review:</b>															
Bloomington, IN MSA	5.02	1	81	1	81	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.18	
Elkhart-Goshen, IN MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.38	
Fort Wayne, IN MSA	0.19	1	3	1	3	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.93	
Lafayette, IN MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.81	
Michigan City-La Porte, IN MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.30	
Muncie, IN MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.42	
South Bend-Mishawaka, IN-MI MSA	94.86	1	1,532	1	1,532	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.67	
Non-Metro IN	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.50	
Statewide	100.00	3	1,615	3	1,615	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	1	110,394	1	110,394	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	9,211	62.29	2.94	1.69	18.05	9.74	49.55	48.67	29.47	39.90	6.96	5.86	5.97	7.24	6.83
<b>Limited Review:</b>															
Bloomington, IN MSA	424	2.87	0.77	0.94	8.38	5.66	54.51	62.50	36.34	30.90	5.23	5.00	1.51	6.93	3.78
Elkhart-Goshen, IN MSA	550	3.72	0.06	0.00	2.92	2.55	90.58	90.91	6.44	6.55	5.13	0.00	5.00	5.08	5.84
Fort Wayne, IN MSA	1,797	12.15	0.81	0.56	18.66	11.24	56.03	52.48	24.49	35.73	4.76	0.00	1.99	5.48	4.41
Lafayette, IN MSA	570	3.85	0.25	0.00	9.47	4.91	54.56	50.53	35.72	44.56	5.62	0.00	1.94	7.96	4.07
Michigan City-La Porte, IN MSA	273	1.85	0.00	0.00	13.50	13.19	69.17	69.23	17.33	17.58	3.38	0.00	2.11	3.58	3.35
South Bend, IN MSA	370	2.50	0.11	0.00	26.38	9.73	34.99	36.76	38.52	53.51	8.67	0.00	5.60	9.29	8.85
Muskegon-Delta, MI MSA	577	3.90	1.29	1.73	19.73	20.28	51.29	48.70	27.68	29.29	1.81	0.00	1.20	1.95	1.88
Non-Metro IN	1,015	6.86	0.91	0.30	9.88	8.77	86.48	89.16	2.73	1.77	15.68	0.00	18.63	16.21	3.00
<b>State Total</b>	<b>14,787</b>	<b>100.00</b>	<b>1.77</b>	<b>1.24</b>	<b>16.21</b>	<b>9.76</b>	<b>56.56</b>	<b>54.03</b>	<b>25.45</b>	<b>34.97</b>	<b>6.48</b>	<b>5.06</b>	<b>4.95</b>	<b>7.10</b>	<b>5.95</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	379	61.33	2.94	5.28	18.05	18.21	49.55	47.76	29.47	28.76	3.14	0.00	3.82	2.42	4.22
<b>Limited Review:</b>															
Bloomington, IN MSA	22	3.56	0.77	0.00	8.38	9.09	54.51	59.09	36.34	31.82	0.46	0.00	0.00	0.86	0.00
Elkhart-Goshen, IN MSA	30	4.85	0.06	0.00	2.92	0.00	90.58	90.00	6.44	10.00	0.65	0.00	0.00	0.67	0.00
Fort Wayne, IN MSA	62	10.03	0.81	1.61	18.66	14.52	56.03	59.68	24.49	24.19	0.76	0.00	0.00	1.32	0.00
Lafayette, IN MSA	14	2.27	0.25	0.00	9.47	7.14	54.56	50.00	35.72	42.86	0.00	0.00	0.00	0.00	0.00
Michigan City-La Porte, IN MSA	24	3.88	0.00	0.00	13.50	12.50	69.17	45.83	17.33	41.67	0.33	0.00	0.00	0.00	1.61
South Bend, IN MSA	15	2.43	0.11	0.00	26.38	6.67	34.99	53.33	38.52	40.00	0.00	0.00	0.00	0.00	0.00
Southwest Michigan, IN-MI MSA	22	3.56	1.29	4.55	19.73	18.18	51.29	50.00	27.68	27.27	1.09	0.00	0.00	0.65	2.30
Non-Metro IN	50	8.09	0.91	2.00	9.88	12.00	86.48	86.00	2.73	0.00	1.16	0.00	0.00	1.25	0.00
<b>State Total</b>	<b>618</b>	<b>100.00</b>	<b>1.77</b>	<b>3.72</b>	<b>16.21</b>	<b>15.37</b>	<b>56.56</b>	<b>54.69</b>	<b>25.45</b>	<b>26.21</b>	<b>1.65</b>	<b>0.00</b>	<b>1.69</b>	<b>1.38</b>	<b>2.30</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	14,483	65.44	2.94	1.41	18.05	9.03	49.55	42.73	29.47	46.83	6.56	3.61	5.50	5.69	7.57
<b>Limited Review:</b>															
Bloomington, IN MSA	744	3.36	0.77	0.81	8.38	5.38	54.51	57.12	36.34	36.69	3.56	0.00	2.80	4.11	3.08
Elkhart-Goshen, IN MSA	1,029	4.65	0.06	0.00	2.92	1.75	90.58	87.17	6.44	11.08	4.21	0.00	1.69	3.90	8.42
Fort Wayne, IN MSA	2,267	10.24	0.81	0.26	18.66	9.22	56.03	48.79	24.49	41.73	4.08	0.00	2.70	3.76	4.61
Lafayette, IN MSA	627	2.83	0.25	0.00	9.47	4.94	54.56	47.69	35.72	47.37	2.82	0.00	3.88	3.24	2.39
Michigan City-La Porte, IN MSA	617	2.79	0.00	0.00	13.50	13.45	69.17	60.62	17.33	25.93	4.76	0.00	4.11	3.92	7.72
South Bend, IN MSA	464	2.10	0.11	0.43	26.38	12.07	34.99	38.15	38.52	49.35	5.46	0.00	3.67	5.50	5.77
Southwest Michigan, IN-MI MSA	796	3.60	1.29	0.63	19.73	12.56	51.29	48.62	27.68	38.19	2.73	0.00	3.14	2.73	2.68
Non-Metro IN	1,106	5.00	0.91	1.36	9.88	6.78	86.48	88.07	2.73	3.80	4.84	5.56	3.79	4.92	4.65
<b>State Total</b>	<b>22,133</b>	<b>100.00</b>	<b>1.77</b>	<b>1.08</b>	<b>16.21</b>	<b>8.67</b>	<b>56.56</b>	<b>48.92</b>	<b>25.45</b>	<b>41.33</b>	<b>5.43</b>	<b>3.15</b>	<b>4.57</b>	<b>4.81</b>	<b>6.33</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	41	77.36	6.79	9.76	31.90	29.27	47.39	48.78	13.92	12.20	2.60	0.00	10.00	0.00	0.00
<b>Limited Review:</b>															
Bloomington, IN MSA	2	3.77	25.20	0.00	18.67	0.00	33.44	100.00	22.69	0.00	0.00	0.00	0.00	0.00	0.00
Elkhart-Goshen, IN MSA	1	1.89	2.97	0.00	7.24	0.00	85.35	100.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00
Fort Wayne, IN MSA	5	9.43	2.62	0.00	38.45	20.00	52.57	60.00	6.36	20.00	0.00	0.00	0.00	0.00	0.00
Lafayette, IN MSA	0	0.00	28.12	0.00	23.97	0.00	20.11	0.00	27.79	0.00	0.00	0.00	0.00	0.00	0.00
Michigan City-La Porte, IN MSA	1	1.89	0.00	0.00	43.62	0.00	48.85	100.00	7.54	0.00	0.00	0.00	0.00	0.00	0.00
Muncie, IN MSA	3	5.66	9.02	0.00	26.64	33.33	33.28	66.67	31.06	0.00	0.00	0.00	0.00	0.00	0.00
South Bend-Mishawaka, IN-MI MSA	0	0.00	2.28	0.00	30.66	0.00	42.25	0.00	24.82	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro IN	0	0.00	8.31	0.00	15.11	0.00	65.69	0.00	10.89	0.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>53</b>	<b>100.00</b>	<b>8.65</b>	<b>7.55</b>	<b>29.64</b>	<b>26.42</b>	<b>46.34</b>	<b>54.72</b>	<b>15.36</b>	<b>11.32</b>	<b>1.03</b>	<b>0.00</b>	<b>5.00</b>	<b>0.00</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	2,408	61.82	2.65	2.37	14.46	15.37	49.31	42.86	33.51	39.41	0.87	0.81	0.89	0.81	0.94
<b>Limited Review:</b>															
Bloomington, IN MSA	143	3.67	13.98	9.79	12.62	16.78	44.20	44.06	29.20	29.37	0.76	0.26	0.80	0.89	0.77
Elkhart-Coshen, IN MSA	283	7.27	3.65	1.77	4.58	3.89	86.93	86.93	4.85	7.42	1.18	0.54	1.08	1.10	3.39
Fort Wayne, IN MSA	541	13.89	1.23	1.11	23.58	23.84	50.43	55.08	24.65	19.96	0.83	1.54	0.60	0.87	0.91
Lafayette, IN MSA	91	2.34	5.38	3.30	28.39	47.25	35.88	28.57	30.16	20.88	0.81	0.00	1.30	0.63	0.73
Michigan City-La Porte, IN MSA	37	0.95	0.00	0.00	27.63	27.03	60.03	37.84	12.34	35.14	0.23	0.00	0.20	0.20	0.40
Muskegon, MI MSA	94	2.41	1.66	0.00	31.10	35.11	32.27	30.85	34.97	34.04	0.42	0.00	0.49	0.81	0.00
South Bend-Mishawaka, IN-MI MSA	136	3.49	1.75	4.41	25.61	24.26	46.81	44.12	25.83	27.21	0.60	2.60	0.63	0.54	0.54
Non-Metro IN	162	4.16	3.98	1.85	9.89	12.35	81.91	84.57	4.21	1.23	0.70	0.00	0.24	0.79	0.65
<b>State Total</b>	<b>3,895</b>	<b>100.00</b>	<b>2.98</b>	<b>2.41</b>	<b>16.93</b>	<b>17.28</b>	<b>52.70</b>	<b>48.91</b>	<b>27.32</b>	<b>31.40</b>	<b>0.81</b>	<b>0.64</b>	<b>0.75</b>	<b>0.81</b>	<b>0.87</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	5	5.68	0.72	0.00	6.65	0.00	67.49	40.00	25.13	60.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bloomington, IN MSA	0	0.00	2.84	0.00	4.74	0.00	62.09	0.00	30.33	0.00	0.00	0.00	0.00	0.00	0.00
Elkhart-Goshen, IN MSA	2	2.27	0.29	0.00	0.58	0.00	97.22	100.00	1.90	0.00	0.00	0.00	0.00	0.00	0.00
Fort Wayne, IN MSA	11	12.50	0.19	0.00	6.48	0.00	75.49	81.82	17.85	18.18	0.00	0.00	0.00	0.00	0.00
Lafayette, IN MSA	20	22.73	0.20	0.00	4.40	0.00	61.60	95.00	33.80	5.00	4.69	0.00	0.00	6.12	0.00
Michigan City-La Porte, IN MSA	2	2.27	0.00	0.00	7.31	0.00	83.25	100.00	9.43	0.00	0.00	0.00	0.00	0.00	0.00
Muskegon, MI MSA	1	1.14	0.00	0.00	8.43	0.00	59.04	100.00	32.53	0.00	0.00	0.00	0.00	0.00	0.00
South Bend-Mishawaka, IN-MI MSA	0	0.00	0.20	0.00	6.97	0.00	69.67	0.00	23.16	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro IN	47	53.41	0.26	0.00	3.15	0.00	95.54	100.00	1.05	0.00	1.82	0.00	0.00	1.87	0.00
<b>State Total</b>	<b>88</b>	<b>100.00</b>	<b>0.48</b>	<b>0.00</b>	<b>5.61</b>	<b>0.00</b>	<b>74.81</b>	<b>93.18</b>	<b>19.10</b>	<b>6.82</b>	<b>0.76</b>	<b>0.00</b>	<b>0.00</b>	<b>0.86</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	9,211	62.29	19.10	14.61	18.49	30.23	23.06	25.06	39.35	30.10	7.27	7.67	7.82	7.30	6.36
<b>Limited Review:</b>															
Bloomington, IN MSA	424	2.87	17.40	8.62	16.89	25.86	21.13	23.85	44.58	41.67	4.67	5.33	6.10	6.25	2.90
Elkhart-Goshen, IN MSA	550	3.72	16.23	14.41	19.39	33.19	27.07	26.42	37.31	25.98	3.92	3.06	5.01	2.58	4.11
Fort Wayne, IN MSA	1,797	12.15	18.07	20.37	19.08	30.42	24.49	25.97	38.37	23.24	4.01	3.45	3.68	4.71	4.49
Lafayette, IN MSA	570	3.85	18.42	14.99	18.69	34.12	23.75	25.84	39.15	25.05	4.73	4.98	6.84	4.50	2.91
Michigan City-La Porte, IN MSA	273	1.85	17.79	11.34	19.40	25.63	25.27	18.07	37.55	44.96	3.44	2.01	5.41	1.32	3.85
Muncie, IN MSA	370	2.50	20.00	16.37	18.73	32.14	21.12	24.70	40.15	26.79	8.64	10.32	9.66	10.17	5.61
South Bend-Mishawaka, IN-MI MSA	577	3.90	18.53	13.66	18.63	25.12	23.48	23.41	39.36	37.80	2.03	0.39	1.84	1.53	3.81
Non-Metro IN	1,015	6.86	17.95	19.02	20.03	40.69	25.01	24.07	37.01	16.22	9.65	13.55	11.27	9.55	5.29
<b>State Total</b>	<b>14,787</b>	<b>100.00</b>	<b>18.56</b>	<b>15.32</b>	<b>18.75</b>	<b>30.83</b>	<b>23.65</b>	<b>24.95</b>	<b>39.04</b>	<b>28.90</b>	<b>6.27</b>	<b>6.30</b>	<b>6.86</b>	<b>6.38</b>	<b>5.48</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: Indiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Indianapolis-Carmel, IN MSA	379	61.33	19.10	15.50	18.49	27.49	23.06	21.35	39.35	35.67	3.28	3.80	5.03	2.76	2.47
<b>Limited Review:</b>															
Bloomington, IN MSA	22	3.56	17.40	4.76	16.89	14.29	21.13	38.10	44.58	42.86	0.55	0.00	0.00	2.13	0.00
Elkhart-Goshen, IN MSA	30	4.85	16.23	10.71	19.39	35.71	27.07	17.86	37.31	35.71	0.65	0.00	2.56	0.00	0.00
Fort Wayne, IN MSA	62	10.03	18.07	10.42	19.08	20.83	24.49	29.17	38.37	39.58	0.80	0.00	3.23	0.00	0.00
Lafayette, IN MSA	14	2.27	18.42	0.00	18.69	33.33	23.75	50.00	39.15	16.67	0.00	0.00	0.00	0.00	0.00
Michigan City-La Porte, IN MSA	24	3.88	17.79	0.00	19.40	23.81	25.27	14.29	37.55	61.90	0.36	0.00	0.00	0.00	0.84
South Bend, IN MSA	15	2.43	20.00	6.67	18.73	13.33	21.12	26.67	40.15	53.33	0.00	0.00	0.00	0.00	0.00
Muskegon-Benton, IN-MI MSA	22	3.56	18.53	16.67	18.63	16.67	23.48	16.67	39.36	50.00	1.14	0.00	0.00	0.00	3.23
Non-Metro IN	50	8.09	17.95	26.67	20.03	28.89	25.01	17.78	37.01	26.67	1.23	5.00	0.00	0.00	1.77
<b>State Total</b>	<b>618</b>	<b>100.00</b>	<b>18.56</b>	<b>14.18</b>	<b>18.75</b>	<b>26.18</b>	<b>23.65</b>	<b>22.55</b>	<b>39.04</b>	<b>37.09</b>	<b>1.75</b>	<b>2.00</b>	<b>2.63</b>	<b>1.24</b>	<b>1.50</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.0% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Indiana										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>	14,483	65.44	19.10	9.70	18.49	19.77	23.06	24.44	39.35	46.09	7.60	7.79	7.85	7.33	7.60	
<b>Limited Review:</b>																
Indianapolis-Carmel, IN MSA	744	3.36	17.40	6.96	16.89	21.20	21.13	24.27	44.58	47.57	4.85	6.90	6.91	6.01	3.61	
Bloomington, IN MSA	1,029	4.65	16.23	11.02	19.39	25.24	27.07	27.01	37.31	36.73	4.53	5.67	4.98	4.63	3.95	
Elkhart-Goshen, IN MSA	2,267	10.24	18.07	10.86	19.08	22.48	24.49	29.08	38.37	37.59	4.94	4.40	4.96	4.86	5.13	
Fort Wayne, IN MSA	627	2.83	18.42	9.59	18.69	19.59	23.75	29.39	39.15	41.43	3.02	4.12	3.36	2.93	2.78	
Lafayette, IN MSA	617	2.79	17.79	5.35	19.40	18.84	25.27	25.27	37.55	50.54	5.14	2.73	4.51	5.40	5.77	
Michigan City-La Porte, IN MSA	464	2.10	20.00	8.38	18.73	20.27	21.12	27.57	40.15	43.78	6.21	5.69	6.09	6.30	6.31	
Muskegon, IN MSA	796	3.60	18.53	10.23	18.63	24.78	23.48	24.78	39.36	40.22	2.89	2.77	3.61	2.53	2.78	
South Bend-Mishawaka, IN-MI MSA	1,106	5.00	17.95	11.20	20.03	25.13	25.01	29.11	37.01	34.55	5.38	6.47	6.16	5.40	4.70	
Non-Metro IN	22,133	100.00	18.56	9.74	18.75	20.78	23.65	25.52	39.04	43.97	6.25	6.32	6.46	6.07	6.25	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 19.3% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Indiana			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Indianapolis-Carmel, IN MSA	2,413	61.87	76.17	52.51	79.61	8.70	11.69	0.87	1.10
<b>Limited Review:</b>									
Bloomington, IN MSA	143	3.67	76.31	55.24	75.52	9.09	15.38	0.76	2.42
Elkhart-Goshen, IN MSA	283	7.26	74.85	31.80	44.17	18.37	37.46	1.18	1.86
Fort Wayne, IN MSA	541	13.87	75.76	38.26	70.06	11.28	18.67	0.83	0.96
Lafayette, IN MSA	91	2.33	73.43	28.57	68.13	15.38	16.48	0.81	1.16
Michigan City-La Porte, IN MSA	37	0.95	74.90	29.73	81.08	8.11	10.81	0.23	0.23
Muncie, IN MSA	94	2.41	75.56	37.23	69.15	19.15	11.70	0.42	0.19
South Bend, IN MSA	136	3.49	74.60	18.38	61.03	12.50	26.47	0.60	0.54
Mishawaka, IN-MI MSA	162	4.15	76.87	32.72	55.56	7.41	37.04	0.70	0.91
Non-Metro IN									
	3,900	100.00	75.81	45.97	73.41	10.26	16.33	0.81	1.04

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 20.03% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Indiana			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Indianapolis-Carmel, IN MSA	5	5.68	97.47	80.00	40.00	0.00	60.00	0.00	0.00
<b>Limited Review:</b>									
Bloomington, IN MSA	0	0.00	96.68	0.00	0.00	0.00	0.00	0.00	0.00
Elkhart-Goshen, IN MSA	2	2.27	98.25	100.00	100.00	0.00	0.00	0.00	0.00
Fort Wayne, IN MSA	11	12.50	97.87	54.55	54.55	45.45	0.00	0.00	0.00
Lafayette, IN MSA	20	22.73	97.60	75.00	35.00	30.00	35.00	4.69	5.71
Michigan City-La Porte, IN MSA	2	2.27	97.41	100.00	100.00	0.00	0.00	0.00	0.00
Muncie, IN MSA	1	1.14	96.69	0.00	100.00	0.00	0.00	0.00	0.00
South Bend-Mishawaka, IN-MI MSA	0	0.00	95.49	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro IN	47	53.41	98.60	59.57	48.94	29.79	21.28	1.82	1.81
<b>State Total</b>	<b>88</b>	<b>100.00</b>	<b>97.58</b>	<b>64.77</b>	<b>48.86</b>	<b>28.41</b>	<b>22.73</b>	<b>0.76</b>	<b>0.80</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 1.14% of small loans to farms originated and purchased by the bank.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Indiana				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	Evaluation Period	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Indianapolis, IN MSA	21	19,141	112	23,635	133	42,776	54.08%	4	17,390
<b>Limited Review:</b>									
Bloomington, IN MSA	2	395	4	132	6	527	0.67%	0	0
Elkhart-Goshen, IN MSA	1	47	11	402	12	449	0.57%	0	0
Fort Wayne, IN MSA	5	1,358	15	18,805	20	20,163	25.49%	1	1
Lafayette, IN MSA	2	1,216	8	89	10	1,305	1.65%	0	0
Michigan City-La Porte, IN MSA	0	0	0	0	0	0	0.00%	0	0
Muncie, IN MSA	2	702	3	1,086	5	1,788	2.26%	0	0
South Bend-Mishawaka, IN-MI MSA	2	304	4	11,483	6	11,787	14.90%	0	0
Non-Metro - Indiana	2	214	6	87	8	301	0.38%	0	0
<b>State Total</b>	<b>37</b>	<b>23,377</b>	<b>163</b>	<b>55,719</b>	<b>200</b>	<b>79,096</b>	<b>100.00%</b>	<b>5</b>	<b>17,391</b>
Statewide Investments with Potential to Benefit one or more AAs	28	9,254	22	7,791	50	17,045	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	1	3	1	3	N/A	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Indiana																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>	72.81	82	58.16	6.10	20.73	45.12	28.05	8	0	0	0	4	4	4.79	22.78	47.01	25.42
<b>Limited Review:</b>																	
Indianapolis-Carmel, IN MSA	3.18	6	4.26	33.33	0.00	50.00	16.67	0	0	0	0	0	0	14.07	15.72	43.21	27.00
Bloomington, IN MSA	6.38	11	7.80	9.09	9.09	81.82	0.00	0	1	0	0	-1	0	0.45	6.06	88.14	5.36
Elkhart-Goshen, IN MSA	7.93	16	11.35	0.00	37.50	43.75	18.75	0	0	0	0	0	0	1.55	24.30	52.62	21.43
Fort Wayne, IN MSA	3.81	6	4.26	16.67	50.00	16.67	16.67	0	0	0	0	0	0	11.66	13.40	41.74	28.61
Lafayette, IN MSA	0.30	1	0.71	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	19.42	66.44	14.14
Michigan City-La Porte, IN MSA	1.42	6	4.26	0.00	33.33	33.33	33.33	0	0	0	0	0	0	5.12	28.04	34.40	32.44
Muncie, IN MSA	0.67	3	2.13	0.00	33.33	66.67	0.00	0	0	0	0	0	0	1.84	24.20	49.83	24.13
South Bend-Mishawaka, IN-MI MSA	3.50	10	7.09	20.00	0.00	70.00	10.00	0	0	0	0	0	0	2.02	10.98	84.33	2.66
Non-Metro IN	100.00	141	100.00	7.80	21.28	48.94	21.99	8	1	0	0	3	4	4.22	20.53	53.01	22.00

State Total

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Kentucky						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Lexington-Fayette, KY MSA	59.51	5,843	916,467	528	78,930	61	14,587	1	3,765	6,433	1,013,749	70.90
<b>Limited Review:</b>												
Bowling Green, KY MSA	5.31	530	78,107	44	5,870	0	0	0	0	574	83,977	1.05
Elizabethtown, KY MSA	13.75	1,427	218,672	57	12,572	1	334	1	600	1,486	232,178	5.78
Owensboro, KY MSA	8.53	850	93,553	54	7,397	18	3,239	0	0	922	104,189	13.91
Non-Metro KY	12.90	1,317	180,298	76	8,777	2	261	0	0	1,395	189,336	8.37
<b>Statewide</b>	100.00	9,967	1,487,097	759	113,546	82	18,421	2	4,365	10,810	1,623,429	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	4	17,045	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Kentucky										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	100.00	4	13,971	4	13,971	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	70.90	
<b>Limited Review:</b>															
Bowling Green, KY MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.05	
Elizabethtown, KY MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.78	
Owensboro, KY MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13.91	
Non-Metro KY	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8.37	
	100.00	4	13,971	4	13,971	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	2,281	55.49	2.73	2.89	19.89	17.01	43.94	37.92	33.44	42.17	5.91	3.26	9.10	6.48	4.54
<b>Limited Review:</b>															
Bowling Green, KY MSA	261	6.35	0.00	0.00	9.66	6.51	54.60	57.09	35.74	36.40	3.25	0.00	0.58	4.45	2.28
Elizabethtown, KY MSA	536	13.04	0.00	0.00	1.64	2.43	82.63	78.92	15.74	18.66	7.42	0.00	4.00	7.07	9.44
Owensboro, KY MSA	413	10.05	0.00	0.00	12.09	11.62	62.07	56.42	25.84	31.96	4.86	0.00	1.10	5.59	5.20
Non-Metro KY	620	15.08	0.09	0.16	0.88	2.58	25.65	32.42	73.37	64.84	13.04	20.00	7.69	13.30	13.13
<b>State Total</b>	<b>4,111</b>	<b>100.00</b>	<b>1.40</b>	<b>1.63</b>	<b>13.15</b>	<b>11.72</b>	<b>49.97</b>	<b>45.51</b>	<b>35.47</b>	<b>41.13</b>	<b>6.35</b>	<b>3.70</b>	<b>7.25</b>	<b>6.66</b>	<b>5.84</b>

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	69	63.30	2.73	4.35	19.89	18.84	43.94	42.03	33.44	34.78	0.73	7.69	0.00	0.72	0.40
<b>Limited Review:</b>															
Bowling Green, KY MSA	4	3.67	0.00	0.00	9.66	0.00	54.60	50.00	35.74	50.00	0.00	0.00	0.00	0.00	0.00
Elizabethtown, KY MSA	11	10.09	0.00	0.00	1.64	0.00	82.63	54.55	15.74	45.45	1.23	0.00	0.00	0.76	3.45
Owensboro, KY MSA	10	9.17	0.00	0.00	12.09	20.00	62.07	40.00	25.84	40.00	0.00	0.00	0.00	0.00	0.00
Non-Metro KY	15	13.76	0.09	0.00	0.88	6.67	25.65	33.33	73.37	60.00	0.00	0.00	0.00	0.00	0.00
State Total	109	100.00	1.40	2.75	13.15	14.68	49.97	42.20	35.47	40.37	0.56	7.69	0.00	0.49	0.43

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	3,486	60.78	2.73	2.12	19.89	12.77	43.94	35.71	33.44	49.40	5.24	3.60	3.80	4.94	5.85
<b>Limited Review:</b>															
Bowling Green, KY MSA	265	4.62	0.00	0.00	9.66	3.40	54.60	39.25	35.74	57.36	2.04	0.00	0.00	1.73	2.56
Elizabethtown, KY MSA	877	15.29	0.00	0.00	1.64	1.37	82.63	78.11	15.74	20.52	7.25	0.00	5.88	7.21	7.49
Owensboro, KY MSA	427	7.45	0.00	0.00	12.09	9.13	62.07	58.08	25.84	32.79	4.51	0.00	4.17	3.82	5.73
Non-Metro KY	680	11.86	0.09	0.00	0.88	0.74	25.65	19.12	73.37	80.15	7.14	0.00	2.17	5.94	7.56
State Total	5,735	100.00	1.40	1.29	13.15	8.89	49.97	42.06	35.47	47.76	5.21	3.59	3.55	4.99	5.75

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	7	58.33	16.64	28.57	24.07	28.57	40.92	28.57	18.37	14.29	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bowling Green, KY MSA	0	0.00	0.00	0.00	41.81	0.00	47.25	0.00	10.94	0.00	0.00	0.00	0.00	0.00	0.00
Elizabethtown, KY MSA	3	25.00	0.00	0.00	21.87	0.00	69.61	100.00	8.52	0.00	0.00	0.00	0.00	0.00	0.00
Owensboro, KY MSA	0	0.00	0.00	0.00	24.69	0.00	69.29	0.00	6.02	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro KY	2	16.67	3.20	0.00	5.51	0.00	48.54	0.00	42.75	100.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>12</b>	<b>100.00</b>	<b>11.43</b>	<b>16.67</b>	<b>23.45</b>	<b>16.67</b>	<b>46.54</b>	<b>41.67</b>	<b>18.58</b>	<b>25.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	528	69.57	9.12	12.12	18.91	16.86	37.68	30.68	34.11	40.34	0.79	1.59	0.63	0.63	0.85
<b>Limited Review:</b>															
Bowling Green, KY MSA	44	5.80	0.00	0.00	20.83	27.27	52.07	43.18	27.11	29.55	0.52	0.00	0.61	0.37	0.66
Elizabethtown, KY MSA	57	7.51	0.00	0.00	6.23	5.26	77.32	77.19	16.45	17.54	0.54	0.00	0.00	0.48	1.03
Owensboro, KY MSA	54	7.11	0.00	0.00	22.62	16.67	55.37	51.85	22.02	31.48	0.51	0.00	0.18	0.63	0.56
Non-Metro KY	76	10.01	0.41	0.00	5.08	7.89	29.57	26.32	64.95	65.79	0.55	0.00	0.00	0.54	0.60
State Total	759	100.00	4.98	8.43	16.50	15.68	44.76	35.97	33.67	39.92	0.68	1.58	0.52	0.56	0.76

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	61	74.39	2.88	4.92	14.78	13.11	43.15	44.26	39.18	37.70	5.29	16.67	4.76	4.88	5.47
<b>Limited Review:</b>															
Bowling Green, KY MSA	0	0.00	0.00	0.00	5.98	0.00	55.84	0.00	38.18	0.00	0.00	0.00	0.00	0.00	0.00
Elizabethtown, KY MSA	1	1.22	0.00	0.00	0.91	0.00	77.20	0.00	21.88	100.00	0.00	0.00	0.00	0.00	0.00
Owensboro, KY MSA	18	21.95	0.00	0.00	5.14	0.00	73.43	100.00	21.43	0.00	7.69	0.00	0.00	8.47	0.00
Non-Metro KY	2	2.44	0.00	0.00	2.02	0.00	21.89	50.00	76.09	50.00	0.00	0.00	0.00	0.00	0.00
State Total	82	100.00	1.67	3.66	10.10	9.76	49.45	56.10	38.77	30.49	4.88	16.67	4.65	5.10	4.19

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	2,281	55.49	20.78	11.56	17.83	26.97	21.67	27.45	39.72	34.03	4.12	3.87	4.25	4.51	3.78
<b>Limited Review:</b>															
Bowling Green, KY MSA	261	6.35	19.59	7.01	16.71	33.64	20.88	26.64	42.83	32.71	1.92	2.44	2.93	1.46	1.34
Elizabethtown, KY MSA	536	13.04	18.06	5.31	18.48	18.31	23.03	32.48	40.43	43.90	8.04	3.94	6.96	8.25	9.22
Owensboro, KY MSA	413	10.05	18.70	14.19	17.31	27.03	23.07	31.76	40.92	27.03	3.89	3.30	3.66	5.37	3.15
Non-Metro KY	620	15.08	15.25	2.77	14.13	13.47	17.95	35.25	52.68	48.51	7.51	10.53	13.39	10.09	4.85
State Total	4,111	100.00	19.36	9.26	17.26	24.09	21.45	29.69	41.93	36.97	4.67	3.86	4.63	5.36	4.43

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.5% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	69	63.30	20.78	9.09	17.83	21.82	21.67	27.27	39.72	41.82	0.78	1.18	0.76	1.18	0.40
<b>Limited Review:</b>															
Bowling Green, KY MSA	4	3.67	19.59	0.00	16.71	0.00	20.88	25.00	42.83	75.00	0.00	0.00	0.00	0.00	0.00
Elizabethtown, KY MSA	11	10.09	18.06	0.00	18.48	25.00	23.03	50.00	40.43	25.00	1.27	0.00	5.56	0.00	0.00
Owensboro, KY MSA	10	9.17	18.70	0.00	17.31	42.86	23.07	14.29	40.92	42.86	0.00	0.00	0.00	0.00	0.00
Non-Metro KY	15	13.76	15.25	9.09	14.13	9.09	17.95	36.36	52.68	45.45	0.00	0.00	0.00	0.00	0.00
State Total	109	100.00	19.36	7.06	17.26	21.18	21.45	29.41	41.93	42.35	0.59	0.66	1.20	0.67	0.20

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 22.0% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Kentucky								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lexington-Fayette, KY MSA	3,486	60.78	20.78	8.96	17.83	21.35	21.67	26.65	39.72	43.03	5.92	6.45	6.61	5.83	5.59
<b>Limited Review:</b>															
Bowling Green, KY MSA	265	4.62	19.59	6.54	16.71	17.29	20.88	26.64	42.83	49.53	2.19	2.55	2.17	2.73	1.89
Elizabethtown, KY MSA	877	15.29	18.06	3.46	18.48	13.03	23.03	27.13	40.43	56.38	8.17	3.10	7.60	9.31	8.33
Owensboro, KY MSA	427	7.45	18.70	10.57	17.31	24.39	23.07	28.46	40.92	36.59	4.81	2.44	5.28	5.15	4.81
Non-Metro KY	680	11.86	15.25	2.36	14.13	9.97	17.95	20.61	52.68	67.06	8.17	11.90	9.55	9.32	7.60
State Total	5,735	100.00	19.36	7.34	17.26	18.75	21.45	26.13	41.93	47.78	5.81	5.58	6.21	5.99	5.61

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 14.5% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Kentucky			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Lexington-Fayette, KY MSA	528	69.57	77.27	37.88	71.59	11.17	17.23	0.79	0.49
<b>Limited Review:</b>									
Bowling Green, KY MSA	44	5.80	76.35	18.18	70.45	15.91	13.64	0.52	0.15
Elizabethtown, KY MSA	57	7.51	78.65	29.82	52.63	19.30	28.07	0.54	0.71
Owensboro, KY MSA	54	7.11	75.36	25.93	68.52	16.67	14.81	0.51	0.58
Non-Metro KY	76	10.01	78.78	43.42	78.95	11.84	9.21	0.55	0.56
State Total	759	100.00	77.29	35.84	70.62	12.52	16.86	0.68	0.47

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 28.72% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Kentucky			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Lexington-Fayette, KY MSA	61	74.39	95.38	67.21	29.51	36.07	34.43	5.29	5.15
<b>Limited Review:</b>									
Bowling Green, KY MSA	0	0.00	98.29	0.00	0.00	0.00	0.00	0.00	0.00
Elizabethtown, KY MSA	1	1.22	99.09	100.00	0.00	0.00	100.00	0.00	0.00
Owensboro, KY MSA	18	21.95	99.14	66.67	61.11	16.67	22.22	7.69	1.89
Non-Metro KY	2	2.44	98.32	50.00	50.00	50.00	0.00	0.00	0.00
<b>State Total</b>	<b>82</b>	<b>100.00</b>	<b>96.78</b>	<b>67.07</b>	<b>36.59</b>	<b>31.71</b>	<b>31.71</b>	<b>4.88</b>	<b>3.86</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 7.32% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Kentucky				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	Evaluation Period	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Lexington-Fayette, KY MSA	4	671	25	2,876	29	3,547	44.11%	0	0
<b>Limited Review:</b>									
Bowling Green, KY MSA	0	0	5	1,426	5	1,426	17.73%	0	0
Elizabethtown, KY MSA	1	118	3	975	4	1,093	13.59%	0	0
Owensboro, KY MSA	0	0	4	1,975	4	1,975	24.56%	0	0
Non-Metro - KY	0	0	1	1	1	1	0.01%	0	0
	5	789	38	7,253	43	8,042	100.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	19	5,309	6	2,219	25	7,528	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	2	3	2	3	N/A	0	0

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

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



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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Kentucky																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Lexington-Fayette, KY MSA	70.90	17	54.84	5.88	23.53	41.18	29.41	0	0	0	0	0	0	7.18	22.78	41.98	27.95
<b>Limited Review:</b>																	
Bowling Green, KY MSA	1.05	1	3.23	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	18.05	54.35	27.60
Elizabethtown, KY MSA	5.78	3	9.68	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	11.74	75.28	12.98
Owensboro, KY MSA	13.91	5	16.13	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	16.43	60.78	22.79
Non-Metro KY	8.37	5	16.13	0.00	20.00	60.00	20.00	0	0	0	0	0	0	4.38	1.99	27.91	65.73
State Total	100.00	31	100.00	3.23	19.35	51.61	25.81	0	0	0	0	0	0	4.28	17.55	47.86	30.25

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume												
Louisiana												
Evaluation Period: January 1, 2007 to December 31, 2010												
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Baton Rouge, LA MSA	25.11	12,461	2,100,035	1,620	219,677	1	35	7	34,335	14,089	2,354,082	40.46
New Orleans-Metairie-Kenner, LA MSA	32.77	15,919	2,773,103	2,424	310,695	10	1,003	32	158,836	18,385	3,243,637	30.67
<b>Limited Review:</b>												
Alexandria, LA MSA	2.58	1,335	171,202	98	13,404	14	1,842	1	3,000	1,448	189,448	1.76
Houma-Bayou Cane-Thibodaux, LA MSA	6.20	2,932	408,966	543	46,473	4	104	1	2,100	3,480	457,643	3.45
Lafayette, LA MSA	8.06	3,587	549,600	927	123,759	4	159	5	21,993	4,523	695,511	6.57
Lake Charles, LA MSA	5.44	2,627	354,896	420	55,675	5	685	1	5,000	3,053	416,256	4.32
Monroe, LA MSA	4.36	2,167	280,065	264	26,900	10	1,506	4	12,120	2,445	320,591	3.91
Shreveport-Bossier City, LA MSA	7.38	3,283	481,875	840	112,062	13	2,486	3	20,059	4,139	616,482	5.73
Non-Metro LA	8.09	4,058	534,981	458	48,952	9	2,026	11	17,879	4,536	603,838	3.12
<b>Total</b>	<b>100.00</b>	<b>48,369</b>	<b>7,654,723</b>	<b>7,594</b>	<b>957,597</b>	<b>70</b>	<b>9,846</b>	<b>65</b>	<b>275,322</b>	<b>56,098</b>	<b>8,897,488</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	14	44,059	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Louisiana										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		State-Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Baton Rouge, LA MSA	20.94	1	10,148	1	10,148	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	40.46	
New Orleans-Metairie-Kenner, LA MSA	78.83	8	38,202	8	38,202	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	30.67	
<b>Limited Review:</b>															
Alexandria, LA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.76	
Houma-Bayou Cane-Thibodaux, LA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.45	
Lafayette, LA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.57	
Lake Charles, LA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.32	
Monroe, LA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.91	
Shreveport-Bossier City, LA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.73	
Non-Metro LA	0.23	1	113	1	113	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.12	
	100.00	10	48,463	10	48,463	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baton Rouge, LA MSA	6,847	28.65	4.47	1.01	15.20	6.18	42.00	52.29	38.34	40.53	11.57	7.94	8.04	14.28	9.12
New Orleans-Metairie-Kenner, LA MSA	5,864	24.54	4.41	2.25	16.22	10.98	42.55	39.15	36.82	47.61	7.83	3.89	6.94	8.01	8.11
<b>Limited Review:</b>															
Alexandria, LA MSA	787	3.29	2.68	0.38	15.76	7.12	42.72	40.53	38.83	51.97	8.73	0.00	3.50	11.11	8.88
Houma-Bayou Cane-Thibodaux, LA MSA	1,356	5.67	0.78	0.74	14.52	9.00	69.72	65.04	14.98	25.22	11.54	27.78	7.04	12.69	9.49
Lafayette, LA MSA	2,041	8.54	3.23	0.49	12.70	11.27	42.62	40.76	41.44	47.48	11.28	5.88	15.04	12.65	9.81
Lake Charles, LA MSA	1,486	6.22	1.38	0.00	18.74	11.98	44.72	44.68	35.16	43.34	8.66	0.00	5.74	11.17	7.22
Monroe, LA MSA	1,386	5.80	6.97	0.43	15.00	3.61	43.46	53.75	34.57	42.21	15.00	12.50	6.19	18.91	12.08
Shreveport-Bossier City, LA MSA	1,665	6.97	4.74	1.08	18.58	6.67	30.55	32.13	46.13	60.12	4.65	1.64	2.99	5.37	4.59
Non-Metro LA	2,468	10.33	1.68	0.85	10.21	6.40	49.27	49.59	38.84	43.15	14.12	16.00	17.22	14.39	13.47
State Total	23,900	100.00	3.71	1.13	15.35	8.25	43.85	46.35	37.09	44.28	9.68	5.74	7.43	11.59	8.49

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baton Rouge, LA MSA	180	18.95	4.47	6.11	15.20	11.67	42.00	38.33	38.34	43.89	1.19	5.56	0.59	0.51	1.91
New Orleans-Metairie-Kenner, LA MSA	348	36.63	4.41	2.87	16.22	14.94	42.55	43.97	36.82	38.22	1.53	2.44	0.33	1.25	2.25
<b>Limited Review:</b>															
Alexandria, LA MSA	37	3.89	2.68	2.70	15.76	2.70	42.72	27.03	38.83	67.57	0.30	0.00	0.00	0.00	0.67
Houma-Bayou Cane-Thibodaux, LA MSA	59	6.21	0.78	0.00	14.52	16.95	69.72	57.63	14.98	25.42	0.75	0.00	0.00	0.21	3.51
Lafayette, LA MSA	56	5.89	3.23	3.57	12.70	10.71	42.62	42.86	41.44	42.86	1.95	0.00	0.00	1.99	2.50
Lake Charles, LA MSA	56	5.89	1.38	3.57	18.74	26.79	44.72	33.93	35.16	35.71	1.02	0.00	2.44	0.44	1.12
Monroe, LA MSA	41	4.32	6.97	4.88	15.00	2.44	43.46	48.78	34.57	43.90	2.14	0.00	0.00	1.96	3.70
Shreveport-Bossier City, LA MSA	86	9.05	4.74	6.98	18.58	13.95	30.55	31.40	46.13	47.67	1.03	0.00	0.98	1.36	0.90
Non-Metro LA	87	9.16	1.68	0.00	10.21	9.20	49.27	59.77	38.84	31.03	1.25	0.00	1.52	1.10	1.46
<b>State Total</b>	<b>950</b>	<b>100.00</b>	<b>3.71</b>	<b>3.58</b>	<b>15.35</b>	<b>13.26</b>	<b>43.85</b>	<b>42.95</b>	<b>37.09</b>	<b>40.21</b>	<b>1.26</b>	<b>2.29</b>	<b>0.67</b>	<b>0.89</b>	<b>1.89</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Louisiana										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Baton Rouge, LA MSA	5,430	23.15	4.47	1.05	15.20	6.81	42.00	41.55	38.34	50.59	6.63	1.97	4.49	6.21	7.36	
New Orleans-Metairie-Kenner, LA MSA	9,665	41.20	4.41	2.48	16.22	10.49	42.55	38.62	36.82	48.40	8.02	4.64	6.43	7.74	8.65	
<b>Limited Review:</b>																
Alexandria, LA MSA	511	2.18	2.68	0.20	15.76	7.24	42.72	35.81	38.83	56.75	3.56	0.00	1.52	4.58	3.29	
Houma-Bayou Cane-Thibodaux, LA MSA	1,516	6.46	0.78	0.20	14.52	7.85	69.72	62.86	14.98	29.09	7.37	0.00	6.74	6.68	9.22	
Lafayette, LA MSA	1,489	6.35	3.23	0.34	12.70	7.45	42.62	39.62	41.44	52.59	6.94	5.26	6.75	7.45	6.67	
Lake Charles, LA MSA	1,083	4.62	1.38	0.37	18.74	10.71	44.72	37.95	35.16	50.97	7.06	40.00	5.56	7.71	6.81	
Monroe, LA MSA	738	3.15	6.97	2.57	15.00	7.59	43.46	39.02	34.57	50.81	4.47	0.00	3.70	4.23	4.82	
Shreveport-Bossier City, LA MSA	1,527	6.51	4.74	1.70	18.58	9.23	30.55	25.21	46.13	63.85	3.75	5.75	2.78	3.35	3.96	
Non-Metro LA	1,501	6.40	1.68	0.80	10.21	5.33	49.27	46.64	38.84	47.24	4.64	5.41	4.62	4.81	4.49	
<b>State Total</b>	<b>23,460</b>	<b>100.00</b>	<b>3.71</b>	<b>1.56</b>	<b>15.35</b>	<b>8.71</b>	<b>43.85</b>	<b>40.49</b>	<b>37.09</b>	<b>49.23</b>	<b>6.54</b>	<b>4.27</b>	<b>5.35</b>	<b>6.44</b>	<b>6.85</b>	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baton Rouge, LA MSA	4	6.90	15.97	0.00	21.03	50.00	25.85	50.00	37.15	0.00	1.85	0.00	7.14	0.00	0.00
New Orleans-Metairie-Kenner, LA MSA	41	70.69	16.38	12.20	27.14	29.27	32.69	34.15	23.79	24.39	0.70	0.00	1.96	0.00	0.00
<b>Limited Review:</b>															
Alexandria, LA MSA	0	0.00	5.46	0.00	20.33	0.00	24.71	0.00	49.51	0.00	0.00	0.00	0.00	0.00	0.00
Houma-Bayou Cane-Thibodaux, LA MSA	1	1.72	1.72	0.00	8.01	0.00	61.93	100.00	28.34	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette, LA MSA	1	1.72	3.97	100.00	7.84	0.00	50.03	0.00	38.16	0.00	5.26	100.00	0.00	0.00	0.00
Lake Charles, LA MSA	2	3.45	1.23	0.00	41.78	0.00	25.34	100.00	31.64	0.00	0.00	0.00	0.00	0.00	0.00
Monroe, LA MSA	2	3.45	8.84	50.00	8.06	0.00	33.17	50.00	49.93	0.00	7.14	0.00	0.00	14.29	0.00
Shreveport-Bossier City, LA MSA	5	8.62	9.38	20.00	19.43	40.00	40.04	0.00	31.15	40.00	0.00	0.00	0.00	0.00	0.00
Non-Metro LA	2	3.45	2.32	0.00	25.65	0.00	43.39	50.00	28.64	50.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>58</b>	<b>100.00</b>	<b>12.86</b>	<b>13.79</b>	<b>23.06</b>	<b>27.59</b>	<b>33.98</b>	<b>36.21</b>	<b>30.10</b>	<b>22.41</b>	<b>1.15</b>	<b>3.70</b>	<b>2.17</b>	<b>0.75</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Baton Rouge, LA MSA	1,620	21.34	5.74	2.53	17.35	12.84	39.70	33.33	37.21	51.30	2.00	0.47	1.74	1.96	2.29
New Orleans-Metairie-Kenner, LA MSA	2,424	31.92	5.70	5.90	18.63	19.27	36.87	31.39	38.80	43.44	1.29	1.20	1.60	1.16	1.29
<b>Limited Review:</b>															
Alexandria, LA MSA	98	1.29	8.23	11.22	16.04	6.12	39.25	35.71	36.47	46.94	0.51	0.26	0.00	0.56	0.70
Houma-Bayou Cane-Thibodaux, LA MSA	542	7.14	1.48	0.37	13.11	16.79	68.14	62.18	17.02	20.66	2.66	0.00	4.24	2.19	3.14
Lafayette, LA MSA	927	12.21	3.29	2.80	8.96	6.26	42.57	43.37	45.17	47.57	2.09	0.58	1.50	2.16	2.21
Lake Charles, LA MSA	420	5.53	1.46	0.00	28.79	34.05	41.11	38.57	28.63	27.38	0.84	0.00	1.21	0.73	0.69
Monroe, LA MSA	264	3.48	10.55	10.98	20.91	24.62	37.25	34.47	31.30	29.92	1.33	1.20	1.35	1.50	1.19
Shreveport-Bossier City, LA MSA	840	11.06	6.91	12.14	22.65	23.45	32.89	27.74	37.55	36.67	1.87	4.12	2.13	2.11	1.27
Non-Metro LA	458	6.03	1.47	0.00	12.80	5.90	50.01	43.01	35.71	51.09	1.26	0.00	0.55	1.11	1.63
<b>State Total</b>	<b>7,593</b>	<b>100.00</b>	<b>5.08</b>	<b>4.66</b>	<b>17.74</b>	<b>16.62</b>	<b>40.98</b>	<b>36.32</b>	<b>36.19</b>	<b>42.39</b>	<b>1.56</b>	<b>1.29</b>	<b>1.63</b>	<b>1.52</b>	<b>1.60</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data



**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Baton Rouge, LA MSA	1	1.43	2.83	0.00	10.01	0.00	41.34	0.00	45.82	100.00	0.00	0.00	0.00	0.00	0.00
New Orleans-Metairie-Kenner, LA MSA	10	14.29	3.52	10.00	13.67	10.00	46.76	20.00	36.05	60.00	3.95	14.29	0.00	0.00	8.00
<b>Limited Review:</b>															
Alexandria, LA MSA	14	20.00	2.01	0.00	7.38	7.14	52.01	71.43	38.59	21.43	6.25	0.00	0.00	7.14	8.33
Houma-Bayou Cane-Thibodaux, LA MSA	4	5.71	0.31	0.00	11.91	0.00	68.65	100.00	19.12	0.00	0.00	0.00	0.00	0.00	0.00
Lafayette, LA MSA	4	5.71	2.02	0.00	10.66	0.00	42.07	50.00	45.24	50.00	0.00	0.00	0.00	0.00	0.00
Lake Charles, LA MSA	5	7.14	0.34	0.00	15.46	20.00	42.96	80.00	41.24	0.00	2.13	0.00	0.00	2.70	0.00
Monroe, LA MSA	10	14.29	2.80	0.00	12.40	0.00	49.20	90.00	35.60	10.00	6.67	0.00	0.00	12.50	0.00
Shreveport-Bossier City, LA MSA	13	18.57	3.56	0.00	11.92	69.23	31.85	30.77	52.67	0.00	10.81	0.00	30.00	9.09	0.00
Non-Metro LA	9	12.86	0.42	0.00	8.25	0.00	46.19	88.89	45.14	11.11	2.04	0.00	0.00	4.88	0.00
<b>State Total</b>	<b>70</b>	<b>100.00</b>	<b>2.22</b>	<b>1.43</b>	<b>11.22</b>	<b>17.14</b>	<b>45.37</b>	<b>61.43</b>	<b>41.18</b>	<b>20.00</b>	<b>3.64</b>	<b>7.69</b>	<b>4.84</b>	<b>4.07</b>	<b>2.08</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baton Rouge, LA MSA	6,847	28.65	21.93	4.98	16.05	24.41	19.16	30.48	42.85	40.14	8.22	7.29	10.36	10.21	5.63
New Orleans-Metairie-Kenner, LA MSA	5,864	24.54	23.82	4.95	16.31	18.88	18.91	27.06	40.96	49.11	6.71	5.21	6.67	6.98	6.79
<b>Limited Review:</b>															
Alexandria, LA MSA	787	3.29	23.02	2.98	16.69	17.16	18.56	37.13	41.73	42.73	4.71	1.41	8.11	6.95	3.13
Houma-Bayou Cane-Thibodaux, LA MSA	1,356	5.67	22.82	3.25	16.00	18.33	20.83	33.10	40.36	45.32	7.65	2.47	8.38	10.36	6.25
Lafayette, LA MSA	2,041	8.54	21.48	4.11	15.76	23.81	19.09	34.67	43.67	37.41	9.28	7.56	11.95	15.04	4.91
Lake Charles, LA MSA	1,486	6.22	22.54	6.13	16.53	22.14	19.57	30.74	41.35	40.99	7.73	7.38	8.45	10.86	5.42
Monroe, LA MSA	1,386	5.80	23.24	7.00	16.12	27.91	18.50	34.32	42.15	30.77	7.21	10.16	8.59	9.24	4.88
Shreveport-Bossier City, LA MSA	1,665	6.97	23.50	4.85	15.87	21.63	19.34	31.64	41.28	41.88	2.24	1.42	2.26	2.11	2.43
Non-Metro LA	2,468	10.33	23.55	2.87	14.44	16.81	17.73	30.95	44.28	49.37	10.02	14.61	14.69	12.60	7.76
State Total	23,900	100.00	23.14	4.70	15.98	21.47	18.99	30.65	41.89	43.18	7.00	5.89	8.16	8.63	5.58

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.7% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baton Rouge, LA MSA	180	18.95	21.93	10.53	16.05	13.45	19.16	26.90	42.85	49.12	1.28	2.11	0.91	1.70	1.06
New Orleans-Metairie-Kenner, LA MSA	348	36.63	23.82	8.48	16.31	15.45	18.91	23.33	40.96	52.73	1.59	1.45	1.23	1.25	1.95
<b>Limited Review:</b>															
Alexandria, LA MSA	37	3.89	23.02	0.00	16.69	0.00	18.56	27.78	41.73	72.22	0.34	0.00	0.00	0.00	0.63
Houma-Bayou Cane-Thibodaux, LA MSA	59	6.21	22.82	11.86	16.00	8.47	20.83	22.03	40.36	57.63	0.81	1.49	0.00	0.76	0.98
Lafayette, LA MSA	56	5.89	21.48	9.62	15.76	9.62	19.09	30.77	43.67	50.00	2.03	2.44	2.22	0.00	2.94
Lake Charles, LA MSA	56	5.89	22.54	7.27	16.53	14.55	19.57	41.82	41.35	36.36	1.08	1.67	1.43	1.04	0.84
Monroe, LA MSA	41	4.32	23.24	7.69	16.12	20.51	18.50	12.82	42.15	58.97	2.31	0.00	8.33	0.00	2.30
Shreveport-Bossier City, LA MSA	86	9.05	23.50	9.41	15.87	17.65	19.34	29.41	41.28	43.53	1.07	0.00	2.63	0.95	0.91
Non-Metro LA	87	9.16	23.55	7.32	14.44	12.20	17.73	24.39	44.28	56.10	1.33	1.32	0.00	2.74	1.23
<b>State Total</b>	<b>950</b>	<b>100.00</b>	<b>23.14</b>	<b>8.69</b>	<b>15.98</b>	<b>13.75</b>	<b>18.99</b>	<b>25.85</b>	<b>41.89</b>	<b>51.71</b>	<b>1.33</b>	<b>1.35</b>	<b>1.21</b>	<b>1.23</b>	<b>1.41</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

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

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Louisiana								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baton Rouge, LA MSA	5,430	23.14	21.93	4.89	16.05	15.55	19.16	23.71	42.85	55.85	7.26	9.64	7.56	7.17	7.07
New Orleans-Metairie-Kenner, LA MSA	9,666	41.20	23.82	5.12	16.31	14.89	18.91	23.76	40.96	56.23	9.09	7.80	8.68	9.45	9.15
<b>Limited Review:</b>															
Alexandria, LA MSA	511	2.18	23.02	4.36	16.69	15.01	18.56	18.64	41.73	61.99	3.91	2.60	5.50	3.10	3.94
Houma-Bayou Cane-Thibodaux, LA MSA	1,516	6.46	22.82	3.90	16.00	12.36	20.83	22.68	40.36	61.06	7.96	6.04	7.64	7.47	8.35
Lafayette, LA MSA	1,489	6.35	21.48	4.86	15.76	12.69	19.09	22.08	43.67	60.38	7.29	5.77	8.48	7.77	6.98
Lake Charles, LA MSA	1,083	4.62	22.54	7.10	16.53	13.41	19.57	23.06	41.35	56.43	7.75	12.61	7.92	6.25	7.94
Monroe, LA MSA	738	3.15	23.24	7.80	16.12	17.38	18.50	23.05	42.15	51.77	4.17	5.00	4.08	5.00	3.83
Shreveport-Bossier City, LA MSA	1,527	6.51	23.50	6.04	15.87	14.10	19.34	24.34	41.28	55.52	4.23	4.84	4.11	4.55	4.11
Non-Metro LA	1,501	6.40	23.55	2.42	14.44	8.21	17.73	17.63	44.28	71.74	5.07	3.23	4.46	5.21	5.19
State Total	23,461	100.00	23.14	5.01	15.98	14.26	18.99	23.05	41.89	57.67	7.24	7.35	7.43	7.44	7.12

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.8% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Louisiana			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Baton Rouge, LA MSA	1,620	21.33	77.44	36.60	73.58	11.73	14.69	2.00	1.76
New Orleans-Metairie-Kenner, LA MSA	2,424	31.92	78.18	46.37	77.10	9.78	13.12	1.29	1.64
<b>Limited Review:</b>									
Alexandria, LA MSA	98	1.29	77.17	32.65	75.51	10.20	14.29	0.51	0.24
Houma-Bayou Cane-Thibodaux, LA MSA	543	7.15	78.60	16.57	85.82	5.16	9.02	2.65	2.17
Lafayette, LA MSA	927	12.21	76.41	44.55	78.21	8.74	13.05	2.09	2.51
Lake Charles, LA MSA	420	5.53	78.01	47.14	75.24	10.24	14.52	0.84	0.55
Monroe, LA MSA	264	3.48	79.39	26.52	80.30	9.85	9.85	1.33	1.28
Shreveport-Bossier City, LA MSA	840	11.06	78.61	30.00	77.38	9.40	13.21	1.87	1.28
Non-Metro LA	458	6.03	79.14	27.07	81.66	6.11	12.23	1.26	0.73
<b>State Total</b>	<b>7,594</b>	<b>100.00</b>	<b>78.10</b>	<b>38.14</b>	<b>77.40</b>	<b>9.51</b>	<b>13.09</b>	<b>1.56</b>	<b>1.47</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 34.75% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Louisiana			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Baton Rouge, LA MSA	1	1.43	95.76	100.00	100.00	0.00	0.00	0.00	0.00
New Orleans-Metairie-Kenner, LA MSA	10	14.29	95.76	40.00	70.00	10.00	20.00	3.95	0.00
<b>Limited Review:</b>									
Alexandria, LA MSA	14	20.00	94.63	71.43	50.00	42.86	7.14	6.25	5.00
Houma-Bayou Cane-Thibodaux, LA MSA	4	5.71	95.92	50.00	100.00	0.00	0.00	0.00	0.00
Lafayette, LA MSA	4	5.71	97.41	75.00	100.00	0.00	0.00	0.00	0.00
Lake Charles, LA MSA	5	7.14	96.22	60.00	60.00	20.00	20.00	2.13	2.63
Monroe, LA MSA	10	14.29	98.40	90.00	40.00	40.00	20.00	6.67	16.67
Shreveport-Bossier City, LA MSA	13	18.57	95.20	76.92	30.77	46.15	23.08	10.81	11.11
Non-Metro LA	9	12.86	96.03	55.56	33.33	22.22	44.44	2.04	0.00
<b>State Total</b>	<b>70</b>	<b>100.00</b>	<b>95.96</b>	<b>67.14</b>	<b>52.86</b>	<b>28.57</b>	<b>18.57</b>	<b>3.64</b>	<b>2.76</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 12.86% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Louisiana				January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
Baton Rouge, LA MSA	12	5,573	76	17,502	88	23,075	8.02%	1	161	
New Orleans-Metairie-Kenner, LA MSA	9	3,545	88	181,554	97	185,099	64.37%	1	2,300	
<b>Limited Review:</b>										
Alexandria, LA MSA	4	337	7	17,573	11	17,910	6.23%	0	0	
Houma-Bayou Cane-Thibodaux, LA MSA	2	157	9	4,775	11	4,932	1.72%	1	645	
Lafayette, LA MSA	3	152	17	10,390	20	10,542	3.67%	0	0	
Lake Charles, LA MSA	3	90	15	21,232	18	21,322	7.42%	0	0	
Monroe, LA MSA	6	1,818	26	4,480	32	6,298	2.19%	0	0	
Shreveport-Bossier City, LA MSA	11	1,199	22	359	33	1,558	0.54%	2	94	
Non-Metro - Louisiana	11	830	14	15,973	25	16,803	5.84%	0	0	
	61	13,701	274	273,838	335	287,539	100.00%	5	3,200	
Statewide Investments with Potential to Benefit one or more AAs	26	2,310	6	3,469	32	5,779	N/A	0	0	
Statewide Investments with no Potential to Benefit one or more AAs	0	0	2	4	2	4	N/A	0	0	

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Louisiana																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Baton Rouge, LA MSA	40.46	32	20.65	9.38	25.00	31.25	34.38	3	4	0	0	2	-3	8.87	19.12	38.44	33.58
New Orleans-Metairie-Kenner, LA MSA	30.67	35	22.58	2.86	8.57	34.29	54.29	1	3	-1	0	0	-1	10.40	21.36	38.40	29.83
<b>Limited Review:</b>																	
Alexandria, LA MSA	1.76	6	3.87	16.67	0.00	50.00	33.33	0	0	0	0	0	0	4.77	20.21	41.19	33.84
Houma-Bayou Cane-Thibodaux, LA MSA	3.45	14	9.03	0.00	28.57	64.29	7.14	0	0	0	0	0	0	1.28	15.59	68.29	14.53
Lafayette, LA MSA	6.57	15	9.68	0.00	6.67	46.67	46.67	0	1	0	-1	0	0	5.14	13.48	43.93	37.45
Lake Charles, LA MSA	4.32	11	7.10	0.00	36.36	45.45	18.18	0	0	0	0	0	0	2.14	24.44	41.75	31.66
Monroe, LA MSA	3.91	12	7.74	16.67	16.67	41.67	25.00	0	1	-1	0	0	0	12.01	18.66	38.12	31.21
Shreveport-Bossier City, LA MSA	5.73	17	10.97	0.00	29.41	41.18	29.41	0	1	-1	0	0	0	7.79	23.17	31.05	37.99
Non-Metro LA	3.12	13	8.39	7.69	7.69	61.54	23.08	0	1	0	0	0	-1	2.33	13.05	49.29	35.33
State Total	100.00	155	100.00	5.16	18.06	42.58	34.19	4	11	-3	-1	2	-5	7.61	19.49	41.13	31.76

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.



Table 1. Lending Volume

Lending Volume		Michigan						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Detroit-Livonia-Dearborn, MI MD	18.75	15,900	2,197,773	1,470	191,332	3	105	19	21,130	17,392	2,410,340	50.13
<b>Limited Review:</b>												
Ann Arbor, MI MSA	4.82	4,171	774,906	299	34,277	1	35	1	4,600	4,472	813,818	3.37
Battle Creek, MI MSA	0.52	462	48,497	18	3,775	0	0	0	0	480	52,272	0.07
Flint, MI MSA	6.18	5,204	575,685	522	80,911	3	320	2	2,434	5,731	659,350	4.57
Grand Rapids-Wyoming, MI MSA	6.90	5,679	800,253	716	149,321	1	17	3	9,259	6,399	958,850	5.42
Holland-Grand Haven, MI MSA	2.93	2,525	399,168	194	26,054	0	0	0	0	2,719	425,222	0.97
Kalamazoo-Portage, MI MSA	1.98	1,704	244,794	126	23,186	1	38	3	3,385	1,834	271,403	0.45
Lansing-East Lansing, MI MSA	2.94	2,558	361,911	159	27,353	0	0	6	46,800	2,723	436,064	1.30
Marquette-Northern Shore, MI MSA	0.92	761	88,719	88	15,264	0	0	0	0	849	103,983	0.11
Niles-Benton Harbor, MI MSA	1.73	1,470	281,703	125	22,220	4	1,010	2	15,302	1,601	320,235	0.79
Saginaw-Saginaw Township North, MI MSA	1.61	1,355	147,629	136	29,723	3	870	2	8,200	1,496	186,422	0.92
Warren-Troy-Farmington Hills, MI MD	43.94	37,335	6,731,258	3,401	570,946	8	915	2	2,000	40,746	7,305,119	28.30
Non-Metro MI	6.79	5,813	851,344	449	70,432	33	5,669	3	12,045	6,298	939,490	3.59
<b>State Total</b>	<b>100.00</b>	<b>84,937</b>	<b>13,503,640</b>	<b>7,703</b>	<b>1,244,794</b>	<b>57</b>	<b>8,979</b>	<b>43</b>	<b>125,155</b>	<b>92,740</b>	<b>14,882,568</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	3	457	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	2,000	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Michigan								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Detroit-Livonia-Dearborn, MI MD	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	50.13
<b>Limited Review:</b>														
Ann Arbor, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.37
Battle Creek, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.07
Grand Rapids, MI MSA	62.60	1	241	1	241	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.57
Flint-Muskegon-Wyoming, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.42
Holland-Grand Haven, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.97
Kalamazoo-Portage, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.45
Lansing-East Lansing-Spring Lake, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.30
Niles-Benton Harbor, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.11
Saginaw-Saginaw Township North, MI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.79
Warren-Troy-Farmington Hills, MI MD	18.70	1	72	1	72	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	28.30
Non-Metro MI	18.70	1	72	1	72	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.59
Statewide	100.00	3	385	3	385	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	2	143,143	2	143,143	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	6,409	19.95	3.81	2.08	22.11	15.70	38.26	34.42	35.82	47.81	5.75	5.07	2.44	4.54	7.02
<b>Limited Review:</b>															
Ann Arbor, MI MSA	1,368	4.26	2.07	2.63	13.42	8.04	55.60	58.92	28.90	30.41	7.12	5.45	5.51	7.89	6.08
Battle Creek, MI MSA	193	0.60	1.87	0.52	26.48	16.06	35.48	35.23	36.17	48.19	4.46	0.00	3.29	3.44	5.61
Flint, MI MSA	2,348	7.31	7.56	1.24	15.95	6.30	42.80	43.06	33.69	49.40	13.53	6.98	9.12	13.44	14.19
Grand Rapids-Wyoming, MI MSA	2,007	6.25	1.09	0.50	13.43	10.46	57.93	61.43	27.54	27.60	4.66	0.00	3.45	5.28	4.15
Holland-Grand Haven, MI MSA	674	2.10	0.00	0.00	4.67	6.68	91.47	91.25	3.87	2.08	4.76	0.00	4.84	4.83	2.65
Kalamazoo-Portage, MI MSA	790	2.46	2.27	0.76	11.27	5.70	50.65	54.56	35.81	38.99	5.30	5.56	1.27	6.15	4.98
Lansing-East Lansing-Shoreline, MI MSA	965	3.00	2.49	2.49	17.53	12.12	49.18	50.67	30.80	34.72	4.89	2.86	3.03	5.64	4.69
Niles-Benton Harbor, MI MSA	338	1.05	4.16	4.14	18.79	15.98	49.58	48.82	27.47	31.07	2.75	7.14	1.00	3.29	2.33
Saginaw-Saginaw Township North, MI MSA	447	1.39	2.31	1.34	6.82	3.13	67.25	73.15	23.62	22.37	5.35	0.00	1.39	6.12	4.29
Warren-Troy-Farmington Hills, MI MD	681	2.12	8.48	0.15	8.97	3.52	58.66	65.93	23.89	30.40	9.42	0.00	6.78	10.59	8.02
Non-Metro MI	13,614	42.38	0.97	0.39	18.95	14.63	53.58	56.03	26.49	28.95	9.04	1.22	8.76	9.53	8.32
<b>State Total</b>	<b>32,123</b>	<b>100.00</b>	<b>2.41</b>	<b>0.97</b>	<b>16.79</b>	<b>12.24</b>	<b>51.90</b>	<b>53.06</b>	<b>28.90</b>	<b>33.73</b>	<b>7.74</b>	<b>3.77</b>	<b>6.56</b>	<b>8.09</b>	<b>7.64</b>

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	342	26.99	3.81	3.51	22.11	31.87	38.26	33.92	35.82	30.70	1.29	3.03	0.43	0.72	2.21
<b>Limited Review:</b>															
Ann Arbor, MI MSA	38	3.00	2.07	0.00	13.42	7.89	55.60	47.37	28.90	44.74	0.28	0.00	0.00	0.50	0.00
Battle Creek, MI MSA	4	0.32	1.87	0.00	26.48	0.00	35.48	25.00	36.17	75.00	0.00	0.00	0.00	0.00	0.00
Flint, MI MSA	119	9.39	7.56	6.72	15.95	18.49	42.80	40.34	33.69	34.45	1.18	0.00	1.72	1.17	1.17
Grand Rapids-Wyoming, MI MSA	75	5.92	1.09	1.33	13.43	20.00	57.93	45.33	27.54	33.33	0.28	0.00	0.00	0.00	0.91
Holland-Grand Haven, MI MSA	34	2.68	0.00	0.00	4.67	5.88	91.47	79.41	3.87	14.71	2.81	0.00	0.00	2.28	25.00
Kalamazoo-Portage, MI MSA	13	1.03	2.27	0.00	11.27	15.38	50.65	46.15	35.81	38.46	0.33	0.00	0.00	0.68	0.00
Lansing-East Lansing-Shoreline, MI MSA	36	2.84	2.49	2.78	17.53	27.78	49.18	36.11	30.80	33.33	0.00	0.00	0.00	0.00	0.00
Niles-Benton Harbor, MI MSA	12	0.95	4.16	8.33	18.79	33.33	49.58	58.33	27.47	0.00	0.74	0.00	0.00	1.64	0.00
Saginaw-Saginaw Township North, MI MSA	33	2.60	2.31	9.09	6.82	6.06	67.25	57.58	23.62	27.27	0.36	0.00	0.00	0.27	0.65
Warren-Troy-Farmington Hills, MI MD	24	1.89	8.48	4.17	8.97	16.67	58.66	50.00	23.89	29.17	0.37	0.00	0.00	0.00	1.10
Non-Metro MI	444	35.04	0.97	3.60	18.95	21.17	53.58	47.52	26.49	27.70	0.52	3.23	0.26	0.38	0.90
State Total	93	7.34	0.00	0.00	4.28	10.75	71.93	70.97	23.79	18.28	0.58	0.00	5.26	0.49	0.00
	1,267	100.00	2.41	3.39	16.79	21.86	51.90	45.62	28.90	29.12	0.67	1.40	0.39	0.53	1.03

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Michigan										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Detroit-Livonia-Dearborn, MI MD	9,099	17.70	3.81	1.74	22.11	12.47	38.26	31.42	35.82	54.37	6.54	1.74	1.09	3.93	8.36	
<b>Limited Review:</b>																
Ann Arbor, MI MSA	2,761	5.37	2.07	1.59	13.42	6.74	55.60	48.24	28.90	43.43	7.97	7.32	4.55	8.28	8.06	
Battle Creek, MI MSA	265	0.52	1.87	0.38	26.48	18.11	35.48	42.64	36.17	38.87	2.83	0.00	1.55	4.21	2.33	
Flint, MI MSA	2,730	5.31	7.56	3.30	15.95	6.92	42.80	39.85	33.69	49.93	6.12	2.00	2.14	4.72	7.59	
Grand Rapids-Wyoming, MI MSA	3,588	6.98	1.09	0.50	13.43	8.64	57.93	47.10	27.54	43.76	4.32	0.00	3.37	3.72	5.16	
Holland-Grand Haven, MI MSA	1,815	3.53	0.00	0.00	4.67	3.75	91.47	92.51	3.87	3.75	6.33	0.00	2.59	6.41	7.31	
Kalamazoo-Portage, MI MSA	898	1.75	2.27	0.89	11.27	7.13	50.65	46.10	35.81	45.88	3.07	0.00	2.16	2.82	3.41	
Lansing-East Lansing-Shoreline, MI MSA	1,553	3.02	2.49	2.51	17.53	13.65	49.18	41.15	30.80	42.69	3.55	0.00	1.74	3.01	4.61	
Niles-Benton Harbor, MI MSA	411	0.80	4.16	2.43	18.79	11.44	49.58	46.23	27.47	39.90	2.00	0.00	0.85	2.18	2.03	
Saginaw-Saginaw Township North, MI MSA	990	1.93	2.31	1.31	6.82	3.33	67.25	68.28	23.62	27.07	5.20	0.00	2.38	5.67	4.46	
Warren-Troy-Farmington Hills, MI MD	649	1.26	8.48	1.39	8.97	5.24	58.66	61.94	23.89	31.43	2.81	0.00	2.88	2.96	2.70	
Non-Metro MI	23,221	45.17	0.97	0.50	18.95	10.19	53.58	47.80	26.49	41.51	9.44	7.03	6.18	8.20	11.84	
	3,427	6.67	0.00	0.00	4.28	4.90	71.93	61.45	23.79	33.64	6.99	0.00	9.16	6.50	7.80	
State Total	51,407	100.00	2.41	0.98	16.79	9.46	51.90	47.24	28.90	42.32	6.85	3.15	4.37	6.13	8.18	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY			Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	48	37.80	13.15	12.50	27.75	33.33	35.30	27.08	23.80	27.08	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Ann Arbor, MI MSA	4	3.15	22.08	0.00	30.13	25.00	39.91	75.00	7.88	0.00	0.00	0.00	0.00	0.00	0.00
Battle Creek, MI MSA	0	0.00	3.43	0.00	31.84	0.00	43.19	0.00	21.54	0.00	0.00	0.00	0.00	0.00	0.00
Flint, MI MSA	7	5.51	11.66	14.29	12.88	0.00	56.68	57.14	18.78	28.57	0.00	0.00	0.00	0.00	0.00
Grand Rapids-Wyoming, MI MSA	9	7.09	0.81	0.00	19.67	55.56	68.11	44.44	11.40	0.00	0.00	0.00	0.00	0.00	0.00
Holland-Grand Haven, MI MSA	2	1.57	0.00	0.00	4.25	50.00	94.68	50.00	1.07	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo-Portage, MI MSA	3	2.36	10.12	0.00	23.21	33.33	54.93	33.33	11.74	33.33	0.00	0.00	0.00	0.00	0.00
Lansing-East Lansing-Shoreline, MI MSA	4	3.15	16.07	0.00	20.17	0.00	42.23	50.00	21.52	50.00	10.53	0.00	0.00	20.00	0.00
Niles-Benton Harbor, MI MSA	0	0.00	12.79	0.00	46.15	0.00	26.83	0.00	14.23	0.00	0.00	0.00	0.00	0.00	0.00
Saginaw-Saginaw Township North, MI MSA	0	0.00	14.41	0.00	15.61	0.00	52.34	0.00	17.64	0.00	0.00	0.00	0.00	0.00	0.00
Warren-Troy-Farmington Hills, MI MD	1	0.79	12.33	0.00	8.96	0.00	42.71	0.00	36.00	100.00	0.00	0.00	0.00	0.00	0.00
Non-Metro MI	45	35.43	5.75	2.22	27.16	40.00	55.32	42.22	11.77	15.56	0.00	0.00	0.00	0.00	0.00
State Total	127	100.00	9.78	6.30	24.39	33.07	49.46	38.58	16.37	22.05	1.14	0.00	0.00	2.08	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	1,451	18.90	5.63	4.20	22.27	19.09	35.23	39.15	36.36	37.56	0.57	0.52	0.47	0.62	0.58
<b>Limited Review:</b>															
Ann Arbor, MI MSA	299	3.89	10.04	11.71	12.85	9.70	51.97	53.18	25.14	25.42	0.45	0.79	0.43	0.47	0.31
Battle Creek, MI MSA	18	0.23	3.06	11.11	24.28	27.78	35.03	50.00	34.59	11.11	0.30	0.00	0.00	0.76	0.16
Flint, MI MSA	522	6.80	8.89	6.90	12.17	9.77	47.28	49.81	31.66	33.52	0.84	0.19	0.54	1.06	0.78
Grand Rapids-Wyoming, MI MSA	716	9.33	2.18	4.05	15.25	13.69	51.61	47.63	30.95	34.64	1.00	1.38	0.63	1.10	0.97
Holland-Grand Haven, MI MSA	194	2.53	0.00	0.00	7.79	8.76	89.66	91.24	2.54	0.00	0.59	0.00	0.52	0.61	0.00
Kalamazoo-Portage, MI MSA	126	1.64	2.91	0.79	18.89	20.63	47.52	48.41	30.68	30.16	0.61	0.00	0.78	0.44	0.79
Lansing-East Lansing, MI MSA	158	2.06	5.25	6.96	19.62	22.15	41.86	41.14	30.13	29.75	0.38	0.36	0.46	0.51	0.17
Marquette-Nonsuch, MI MSA	88	1.15	5.35	2.27	22.69	26.14	39.40	43.18	32.56	28.41	0.79	0.00	1.01	1.00	0.51
Niles-Benton Harbor, MI MSA	125	1.63	6.01	4.00	10.17	6.40	61.38	41.60	22.44	48.00	0.76	1.32	0.79	0.26	1.83
Saginaw-Saginaw Township North, MI MSA	136	1.77	7.32	5.15	10.23	22.79	56.74	47.06	25.71	25.00	0.41	0.00	1.26	0.27	0.42
Warren-Troy-Farmington Hills, MI MD	3,396	44.23	2.27	3.59	17.70	18.64	51.05	47.20	28.85	30.57	0.70	1.23	0.84	0.67	0.61
Non-Metro MI	449	5.85	0.00	0.00	3.37	1.78	72.66	73.27	23.97	24.94	0.57	0.00	0.00	0.57	0.62
<b>State Total</b>	<b>7,678</b>	<b>100.00</b>	<b>3.81</b>	<b>4.05</b>	<b>16.44</b>	<b>16.16</b>	<b>50.15</b>	<b>48.53</b>	<b>29.28</b>	<b>31.26</b>	<b>0.66</b>	<b>0.74</b>	<b>0.68</b>	<b>0.67</b>	<b>0.63</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS		Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010					
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
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	3	5.26	3.04	0.00	15.86	0.00	40.10	33.33	40.83	66.67	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Ann Arbor, MI MSA	1	1.75	2.06	0.00	5.33	0.00	61.38	0.00	31.23	100.00	0.00	0.00	0.00	0.00	0.00
Battle Creek, MI MSA	0	0.00	1.96	0.00	13.73	0.00	35.29	0.00	49.02	0.00	0.00	0.00	0.00	0.00	0.00
Flint, MI MSA	3	5.26	3.16	0.00	6.44	33.33	42.74	33.33	47.66	33.33	0.00	0.00	0.00	0.00	0.00
Grand Rapids-Wyoming, MI MSA	1	1.75	0.28	0.00	3.67	0.00	66.22	100.00	29.83	0.00	0.93	0.00	0.00	1.28	0.00
Holland-Grand Haven, MI MSA	0	0.00	0.00	0.00	1.50	0.00	97.49	0.00	1.00	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo-Portage, MI MSA	1	1.75	0.96	0.00	10.17	100.00	47.41	0.00	41.46	0.00	0.00	0.00	0.00	0.00	0.00
Lansing-East Lansing, MI MSA	0	0.00	1.87	0.00	11.05	0.00	57.25	0.00	29.56	0.00	0.00	0.00	0.00	0.00	0.00
Marquette-Niles-Shores, MI MSA	0	0.00	1.83	0.00	11.93	0.00	62.39	0.00	23.85	0.00	0.00	0.00	0.00	0.00	0.00
Niles-Benton Harbor, MI MSA	4	7.02	1.66	0.00	2.87	0.00	78.25	75.00	17.22	25.00	2.04	0.00	0.00	2.33	0.00
Saginaw-Saginaw Township North, MI MSA	3	5.26	1.78	0.00	2.08	0.00	73.74	100.00	22.40	0.00	3.23	0.00	0.00	4.35	0.00
Warren-Troy-Farmington Hills, MI MD	8	14.04	1.49	0.00	16.95	50.00	61.21	50.00	20.36	0.00	3.92	0.00	13.33	3.03	0.00
Non-Metro MI	33	57.89	0.00	0.00	0.87	0.00	77.07	96.97	22.06	3.03	2.53	0.00	0.00	2.92	0.00
<b>State Total</b>	<b>57</b>	<b>100.00</b>	<b>1.37</b>	<b>0.00</b>	<b>9.40</b>	<b>10.53</b>	<b>63.30</b>	<b>78.95</b>	<b>25.90</b>	<b>10.53</b>	<b>1.59</b>	<b>0.00</b>	<b>7.41</b>	<b>1.64</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data



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

Borrower Distribution: HOME PURCHASE		Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	6,411	19.95	23.09	7.37	16.60	26.21	19.31	29.07	41.01	37.35	6.54	5.26	5.64	7.02	7.55
<b>Limited Review:</b>															
Ann Arbor, MI MSA	1,368	4.26	19.62	16.70	18.04	28.09	22.71	27.03	39.63	28.18	6.80	8.11	7.84	6.64	4.80
Battle Creek, MI MSA	193	0.60	20.43	22.22	19.12	34.57	21.43	23.46	39.02	19.75	3.69	4.60	4.98	3.29	1.51
Flint, MI MSA	2,348	7.31	22.10	17.65	17.07	33.53	20.46	28.04	40.37	20.78	7.01	7.65	7.42	6.44	6.61
Grand Rapids-Wyoming, MI MSA	2,007	6.25	17.65	18.85	18.37	30.31	24.34	26.36	39.63	24.48	3.53	3.86	3.31	3.80	3.27
Holland-Grand Haven, MI MSA	674	2.10	14.28	26.61	19.85	29.83	29.77	20.17	36.09	23.39	4.29	5.84	4.24	3.08	3.56
Kalamazoo-Portage, MI MSA	790	2.46	17.89	17.31	17.69	32.33	23.20	25.97	41.21	24.38	2.50	2.05	3.53	1.80	2.24
Lansing-East Lansing-Shoreline, MI MSA	965	3.00	20.60	13.61	18.47	30.82	21.99	26.11	38.95	29.46	4.04	4.63	3.84	3.97	3.82
Niles-Benton Harbor, MI MSA	338	1.05	21.16	19.06	19.47	35.12	22.13	24.41	37.24	21.40	2.12	1.67	2.14	2.90	1.73
Saginaw-Saginaw Township North, MI MSA	447	1.39	20.21	8.19	17.87	21.75	21.98	17.51	39.93	52.54	4.19	2.63	3.41	4.41	4.86
Warren-Troy-Farmington Hills, MI MD	681	2.12	21.61	15.83	17.36	32.11	20.27	26.61	40.76	25.46	5.31	5.81	5.49	4.17	5.81
Non-Metro MI	13,624	42.40	18.39	20.88	18.77	31.61	23.93	22.81	38.92	24.70	7.92	7.80	7.91	7.56	8.48
State Total	2,289	7.12	15.40	14.06	18.78	31.67	24.30	27.23	41.52	27.04	9.89	13.92	13.62	10.88	5.50
	32,135	100.00	19.78	16.62	17.99	30.23	22.41	25.27	39.81	27.88	6.42	6.61	6.42	6.35	6.33

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.2% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT		Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	342	26.99	23.09	14.34	16.60	24.15	19.31	21.89	41.01	39.62	1.34	1.41	1.35	0.68	1.93
<b>Limited Review:</b>															
Ann Arbor, MI MSA	38	3.00	19.62	10.71	18.04	17.86	22.71	21.43	39.63	50.00	0.29	0.00	0.00	0.00	0.85
Battle Creek, MI MSA	4	0.32	20.43	0.00	19.12	33.33	21.43	0.00	39.02	66.67	0.00	0.00	0.00	0.00	0.00
Flint, MI MSA	119	9.39	22.10	14.15	17.07	31.13	20.46	22.64	40.37	32.08	1.26	0.00	0.80	1.69	1.80
Grand Rapids-Wyoming, MI MSA	75	5.92	17.65	9.38	18.37	25.00	24.34	23.44	39.63	42.19	0.15	0.00	0.00	0.59	0.00
Holland-Grand Haven, MI MSA	34	2.68	14.28	28.00	19.85	36.00	29.77	16.00	36.09	20.00	2.94	3.45	4.40	2.38	1.47
Kalamazoo-Portage, MI MSA	13	1.03	17.89	0.00	17.69	14.29	23.20	42.86	41.21	42.86	0.34	0.00	0.00	1.49	0.00
Lansing-East Lansing-Spring Lake, MI MSA	36	2.84	20.60	26.09	18.47	8.70	21.99	21.74	38.95	43.48	0.00	0.00	0.00	0.00	0.00
Marquette-Houghton, MI MSA	12	0.95	21.16	30.00	19.47	10.00	22.13	30.00	37.24	30.00	0.80	3.33	0.00	0.00	0.00
Niles-Benton Harbor, MI MSA	33	2.60	20.21	16.67	17.87	13.33	21.98	23.33	39.93	46.67	0.37	0.00	0.00	0.73	0.39
Saginaw-Saginaw Township North, MI MSA	24	1.89	21.61	12.50	17.36	8.33	20.27	29.17	40.76	50.00	0.39	0.00	0.00	0.00	1.33
Warren-Troy-Farmington Hills, MI MD	444	35.04	18.39	20.12	18.77	23.22	23.93	27.24	38.92	29.41	0.56	0.50	0.40	0.44	0.91
Non-Metro MI	93	7.34	15.40	17.98	18.78	15.73	24.30	19.10	41.52	47.19	0.62	0.00	0.00	1.72	0.50
<b>State Total</b>	<b>1,267</b>	<b>100.00</b>	<b>19.78</b>	<b>16.75</b>	<b>17.99</b>	<b>22.77</b>	<b>22.41</b>	<b>23.77</b>	<b>39.81</b>	<b>36.71</b>	<b>0.69</b>	<b>0.56</b>	<b>0.61</b>	<b>0.72</b>	<b>0.80</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.3% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Michigan								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Detroit-Livonia-Dearborn, MI MD	9,099	17.70	23.09	4.97	16.60	16.17	19.31	23.00	41.01	55.86	8.17	5.25	6.31	6.87	9.61
<b>Limited Review:</b>															
Ann Arbor, MI MSA	2,761	5.37	19.62	9.90	18.04	19.75	22.71	25.48	39.63	44.87	9.67	12.24	11.13	8.18	9.46
Battle Creek, MI MSA	265	0.52	20.43	13.86	19.12	18.67	21.43	31.33	39.02	36.14	2.80	3.64	2.40	3.40	2.45
Flint, MI MSA	2,730	5.31	22.10	8.57	17.07	24.05	20.46	27.03	40.37	40.35	7.93	5.81	8.53	8.30	7.82
Grand Rapids-Wyoming, MI MSA	3,588	6.98	17.65	9.02	18.37	21.36	24.34	25.48	39.63	44.14	5.05	3.15	4.76	4.85	5.76
Holland-Grand Haven, MI MSA	1,815	3.53	14.28	11.04	19.85	26.52	29.77	30.76	36.09	31.68	8.17	5.78	8.21	8.93	8.33
Kalamazoo-Portage, MI MSA	898	1.75	17.89	7.15	17.69	20.03	23.20	27.90	41.21	44.92	3.49	3.09	3.02	3.47	3.73
Lansing-East Lansing-Shoreline, MI MSA	1,553	3.02	20.60	7.09	18.47	19.84	21.99	25.94	38.95	47.13	4.60	2.93	3.80	5.10	5.07
Niles-Benton Harbor, MI MSA	411	0.80	21.16	6.11	19.47	27.01	22.13	24.44	37.24	42.44	2.67	0.00	1.72	3.38	3.44
Saginaw-Saginaw Township North, MI MSA	990	1.93	20.21	4.90	17.87	9.55	21.98	17.99	39.93	67.56	6.24	3.67	3.66	4.63	7.74
Warren-Troy-Farmington Hills, MI MD	649	1.26	21.61	7.79	17.36	22.32	20.27	26.95	40.76	42.95	2.85	1.67	4.13	2.49	2.76
Non-Metro MI	23,222	45.17	18.39	10.76	18.77	20.70	23.93	26.07	38.92	42.47	11.41	10.08	10.75	10.41	12.93
State Total	3,427	6.67	15.40	5.36	18.78	16.80	24.30	25.07	41.52	52.77	8.64	6.04	8.19	8.35	9.22
	51,408	100.00	19.78	8.82	17.99	19.86	22.41	25.53	39.81	45.78	8.37	7.21	7.94	7.86	9.14

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 22.2% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Michigan			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Detroit-Livonia-Dearborn, MI MD	1,470	19.08	78.62	50.61	75.71	10.88	13.40	0.59	0.68
<b>Limited Review:</b>									
Ann Arbor, MI MSA	299	3.88	78.62	45.48	78.93	9.03	12.04	0.45	0.35
Battle Creek, MI MSA	18	0.23	75.42	11.11	61.11	16.67	22.22	0.29	0.00
Flint, MI MSA	522	6.78	81.13	52.68	68.97	13.41	17.62	0.84	1.24
Grand Rapids-Wyoming, MI MSA	716	9.30	76.25	30.31	60.61	13.69	25.70	1.00	0.38
Holland-Grand Haven, MI MSA	194	2.52	79.74	27.32	72.16	10.31	17.53	0.59	0.51
Kalamazoo-Portage, MI MSA	126	1.64	76.40	3.17	62.70	13.49	23.81	0.61	0.10
Lansing, MI MSA	159	2.06	74.87	34.59	64.15	11.95	23.90	0.37	0.16
Marquette-Nonsuch, MI MSA	88	1.14	77.04	4.55	65.91	12.50	21.59	0.79	0.00
Niles-Benton Harbor, MI MSA	125	1.62	79.50	27.20	64.80	13.60	21.60	0.76	0.78
Saginaw-Saginaw Township North, MI MSA	136	1.77	76.49	27.21	54.41	14.71	30.88	0.41	0.16
Warren-Troy-Farmington Hills, MI MD	3,401	44.15	79.58	43.93	68.77	11.64	19.58	0.69	0.56
Non-Metro MI	449	5.83	81.71	40.98	69.04	14.03	16.93	0.57	0.55
<b>State Total</b>	<b>7,703</b>	<b>100.00</b>	<b>78.84</b>	<b>42.05</b>	<b>69.28</b>	<b>11.96</b>	<b>18.76</b>	<b>0.66</b>	<b>0.52</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 19.91% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Michigan			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Detroit-Livonia-Dearborn, MI MD	3	5.26	96.66	66.67	100.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Ann Arbor, MI MSA	1	1.75	96.73	100.00	100.00	0.00	0.00	0.00	0.00
Battle Creek, MI MSA	0	0.00	93.14	0.00	0.00	0.00	0.00	0.00	0.00
Flint, MI MSA	3	5.26	97.66	100.00	66.67	33.33	0.00	0.00	0.00
Grand Rapids-Wyoming, MI MSA	1	1.75	95.42	0.00	100.00	0.00	0.00	0.93	0.00
Holland-Grand Haven, MI MSA	0	0.00	93.98	0.00	0.00	0.00	0.00	0.00	0.00
Kalamazoo-Portage, MI MSA	1	1.75	92.13	0.00	100.00	0.00	0.00	0.00	0.00
Lansing-East Lansing-Shoreline, MI MSA	0	0.00	96.27	0.00	0.00	0.00	0.00	0.00	0.00
Marquette-Houghton, MI MSA	0	0.00	95.87	0.00	0.00	0.00	0.00	0.00	0.00
Niles-Benton Harbor, MI MSA	4	7.02	96.68	75.00	25.00	25.00	50.00	2.04	2.94
Saginaw-Saginaw Township North, MI MSA	3	5.26	97.77	0.00	0.00	33.33	66.67	3.23	0.00
Warren-Troy-Farmington Hills, MI MD	8	14.04	96.37	12.50	62.50	12.50	25.00	3.92	1.92
Non-Metro MI	33	57.89	98.03	42.42	48.48	15.15	36.36	2.53	1.05
<b>State Total</b>	<b>57</b>	<b>100.00</b>	<b>96.45</b>	<b>42.11</b>	<b>52.63</b>	<b>15.79</b>	<b>31.58</b>	<b>1.59</b>	<b>0.70</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 14.04% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: Michigan									
January 1, 2007 to December 31, 2010									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	Evaluation Period	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Detroit-Livonia-Dearborn, MI MD	79	22,937	217	93,518	296	116,455	70.64%	1	5
<b>Limited Review:</b>									
Ann Arbor, MI MSA	7	2,586	12	337	19	2,923	1.77%	0	0
Battle Creek, MI MSA	2	181	1	2,065	3	2,246	1.36%	0	0
Flint, MI MSA	12	3,368	24	850	36	4,218	2.56%	0	0
Grand Rapids-Wyoming, MI MSA	26	4,731	46	3,153	72	7,884	4.78%	0	0
Holland-Grand Haven, MI MSA	5	310	6	1,440	11	1,750	1.06%	0	0
Kalamazoo-Portage, MI MSA	9	982	8	1,750	17	2,732	1.66%	0	0
Lansing-East Lansing, MI MSA	23	1,232	12	342	35	1,574	0.95%	0	0
Muskegon-Norton Shores, MI MSA	8	1,816	1	5	9	1,821	1.10%	0	0
Niles-Benton Harbor, MI MSA	5	1,230	6	50	11	1,280	0.78%	0	0
Saginaw-Saginaw Township North, MI MSA	5	885	9	34	14	919	0.56%	0	0
Warren-Farmington Hills-Troy, MI MD	17	5,194	54	13,394	71	18,588	11.27%	0	0
Non-Metro - Michigan	28	1,998	10	475	38	2,473	1.50%	0	0
	226	47,450	406	117,413	632	164,863	100.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	73	11,445	15	12,117	88	23,562	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	8	9,025	8	9,025	N/A	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Michigan																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Detroit-Livonia-Dearborn, MI MD	50.13	70	22.95	2.86	15.71	40.00	40.00	4	2	-1	0	1	2	7.80	30.49	33.77	27.85
<b>Limited Review:</b>																	
Ann Arbor, MI MSA	3.37	13	4.26	7.69	0.00	53.85	38.46	2	0	0	0	2	0	11.48	18.11	48.69	21.72
Battle Creek, MI MSA	0.07	1	0.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.09	31.06	35.07	30.76
Flint, MI MSA	4.57	28	9.18	14.29	14.29	46.43	25.00	1	0	0	0	0	1	12.32	17.84	40.48	29.36
Grand Rapids-Wyoming, MI MSA	5.42	30	9.84	0.00	13.33	60.00	26.67	0	1	0	0	-1	0	2.34	18.66	55.30	23.70
Holland-Grand Haven, MI MSA	0.97	8	2.62	0.00	12.50	87.50	0.00	0	0	0	0	0	0	0.00	5.86	90.83	3.31
Kalamazoo-Portage, MI MSA	0.45	4	1.31	0.00	25.00	75.00	0.00	1	0	0	0	1	0	7.82	16.76	46.63	28.79
Lansing-East Lansing, MI MSA	1.30	6	1.97	0.00	16.67	50.00	16.67	1	0	0	0	1	0	7.74	20.81	43.89	26.47
Marquette-Norton Shores, MI MSA	0.11	2	0.66	0.00	0.00	50.00	50.00	0	0	0	0	0	0	7.10	26.84	42.81	23.24
Niles-Benton Harbor, MI MSA	0.79	5	1.64	20.00	20.00	0.00	60.00	0	0	0	0	0	0	5.96	9.99	63.16	20.88
Saginaw-Saginaw Township North, MI MSA	0.92	9	2.95	0.00	11.11	66.67	22.22	0	0	0	0	0	0	12.52	11.50	53.37	22.61
Warren-Troy-Farmington Hills, MI MD	28.30	104	34.10	3.85	17.31	50.00	28.85	14	1	0	1	8	4	2.05	20.52	52.36	25.06
Non-Metro MI	3.59	25	8.20	0.00	8.00	76.00	16.00	0	0	0	0	0	0	0.00	4.24	72.32	23.44
<b>State Total</b>	<b>100.00</b>	<b>305</b>	<b>100.00</b>	<b>3.93</b>	<b>14.43</b>	<b>51.80</b>	<b>29.18</b>	<b>23</b>	<b>4</b>	<b>-1</b>	<b>1</b>	<b>12</b>	<b>7</b>	<b>5.31</b>	<b>21.07</b>	<b>48.45</b>	<b>25.09</b>

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Nevada						Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Las Vegas-Paradise, NV MSA	100.00	10,002	2,176,167	587	28,688	0	0	1	655	10,590	2,205,510	100.00
<del>State Total</del>	100.00	10,002	2,176,167	587	28,688	0	0	1	655	10,590	2,205,510	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.



**Table 1. Other Products**

Lending Volume		Nevada								Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Las Vegas-Paradise, NV MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
State Total	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	4,987	100.00	0.39	0.70	16.32	6.42	44.57	44.21	38.72	48.67	2.92	3.73	3.07	2.95	2.87
State Total	4,987	100.00	0.39	0.70	16.32	6.42	44.57	44.21	38.72	48.67	2.92	3.73	3.07	2.95	2.87

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	177	100.00	0.39	0.00	16.32	3.95	44.57	36.16	38.72	59.89	3.11	0.00	2.00	2.50	3.73
State Total	177	100.00	0.39	0.00	16.32	3.95	44.57	36.16	38.72	59.89	3.11	0.00	2.00	2.50	3.73

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	4,645	100.00	0.39	0.13	16.32	4.56	44.57	34.51	38.72	60.80	4.91	3.08	2.70	4.04	5.76
State Total	4,645	100.00	0.39	0.13	16.32	4.56	44.57	34.51	38.72	60.80	4.91	3.08	2.70	4.04	5.76

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	191	100.00	5.44	1.57	45.33	16.23	37.71	39.27	11.53	42.93	0.00	0.00	0.00	0.00	0.00
State Total	191	100.00	5.44	1.57	45.33	16.23	37.71	39.27	11.53	42.93	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010				
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
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	586	100.00	2.52	1.71	19.27	12.46	37.41	35.49	40.38	50.34	0.08	0.28	0.13	0.06	0.06
	586	100.00	2.52	1.71	19.27	12.46	37.41	35.49	40.38	50.34	0.08	0.28	0.13	0.06	0.06

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010				
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
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	0	100.00	0.96	0.00	15.17	0.00	40.78	0.00	43.09	0.00	0.00	0.00	0.00	0.00	0.00
State Total	0	100.00	0.96	0.00	15.17	0.00	40.78	0.00	43.09	0.00	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	4,989	100.00	18.69	18.81	18.74	27.38	23.47	23.85	39.10	29.95	3.42	5.13	3.71	2.90	2.98
State Total	4,989	100.00	18.69	18.81	18.74	27.38	23.47	23.85	39.10	29.95	3.42	5.13	3.71	2.90	2.98

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 24.5% of loans originated and purchased by bank.



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

Borrower Distribution: HOME IMPROVEMENT		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	177	100.00	18.69	16.67	18.74	33.33	23.47	13.33	39.10	36.67	3.38	7.69	7.96	1.10	2.30
State Total	177	100.00	18.69	16.67	18.74	33.33	23.47	13.33	39.10	36.67	3.38	7.69	7.96	1.10	2.30

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 83.1% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Nevada								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	4,645	100.00	18.69	8.41	18.74	17.66	23.47	24.52	39.10	49.40	6.92	7.30	7.11	6.81	6.85
State Total	4,645	100.00	18.69	8.41	18.74	17.66	23.47	24.52	39.10	49.40	6.92	7.30	7.11	6.81	6.85

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 45.7% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Nevada			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Las Vegas-Paradise, NV MSA	587	100.00	74.99	73.08	96.59	1.53	1.87	0.08	0.02
State Total	587	100.00	74.99	73.08	96.59	1.53	1.87	0.08	0.02

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 12.10% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Nevada			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Las Vegas-Paradise, NV MSA	0	100.00	92.25	0.00	0.00	0.00	0.00	0.00	0.00
State Total	0	100.00	92.25	0.00	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Nevada				September 26, 2008 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Las Vegas-Paradise, NV MSA	18	21,754	21	16,813	39	38,567	100.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	18	4,437	4	262	22	4,699	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	3	1,164	1	70	4	1,234	N/A	1	15

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Nevada																	
Evaluation Period: September 26, 2008 to December 31, 2010																	
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
<b>Full Review:</b>																	
Las Vegas-Paradise, NV MSA	100.00	41	100.00	0.00	12.20	46.34	41.46	5	1	0	0	2	2	2.05	27.84	41.73	28.38
State Total	100.00	41	100.00	0.00	12.20	46.34	41.46	5	1	0	0	2	2	2.05	27.84	41.73	28.38

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 37 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		New Jersey						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Trenton-Ewing, NJ MSA	75.09	3,537	885,072	131	15,077	0	0	3	2,111	3,671	902,260	82.48
<b>Limited Review:</b>												
Allentown-Bethlehem-Easton, PA-NJ MSA	24.91	1,139	255,947	77	3,404	2	55	0	0	1,218	259,406	17.52
<b>State Total</b>	<b>100.00</b>	<b>4,676</b>	<b>1,141,019</b>	<b>208</b>	<b>18,481</b>	<b>2</b>	<b>55</b>	<b>3</b>	<b>2,111</b>	<b>4,889</b>	<b>1,161,666</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	8,564	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	4	24,712	0	0	N/A

\* Deposit data as of June 30, 2010.

**Table 1. Other Products**

Lending Volume		New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Trenton-Ewing, NJ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	82.48
<b>Limited Review:</b>														
Allentown-Bethlehem-Easton, PA-NJ MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	17.52
<b>State Total</b>	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.



**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	1,067	80.17	6.07	7.78	12.82	10.78	38.98	32.43	42.12	49.02	2.69	0.76	1.39	2.47	3.43
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	264	19.83	0.00	0.00	2.15	3.03	33.80	25.00	64.05	71.97	4.25	0.00	4.35	1.19	5.76
State Total	1,331	100.00	4.55	6.24	10.15	9.24	37.69	30.95	47.60	53.57	3.02	0.76	1.52	2.24	4.10

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	53	72.60	6.07	5.66	12.82	11.32	38.98	41.51	42.12	41.51	0.99	0.00	0.00	0.55	1.69
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	20	27.40	0.00	0.00	2.15	0.00	33.80	35.00	64.05	65.00	0.45	0.00	0.00	0.00	0.65
State Total	73	100.00	4.55	4.11	10.15	8.22	37.69	39.73	47.60	47.95	0.80	0.00	0.00	0.42	1.21

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	2,395	73.76	6.07	3.34	12.82	8.02	38.98	32.73	42.12	55.91	6.14	3.28	3.29	5.01	7.29
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	852	26.24	0.00	0.00	2.15	1.64	33.80	24.30	64.05	74.06	5.86	0.00	0.00	3.99	6.57
State Total	3,247	100.00	4.55	2.46	10.15	6.34	37.69	30.52	47.60	60.67	6.07	3.28	3.18	4.82	7.08

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	22	88.00	19.55	0.00	8.94	68.18	40.17	13.64	31.35	18.18	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	3	12.00	0.00	0.00	3.30	0.00	60.35	33.33	36.36	66.67	0.00	0.00	0.00	0.00	0.00
State Total	25	100.00	16.33	0.00	8.01	60.00	43.49	16.00	32.17	24.00	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010					
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
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	131	62.98	10.36	6.11	9.85	7.63	33.43	39.69	46.35	46.56	0.30	0.47	0.36	0.27	0.30
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	77	37.02	0.00	0.00	2.08	0.00	35.18	27.27	62.74	72.73	0.69	0.00	0.00	0.74	0.69
State Total	208	100.00	7.94	3.85	8.04	4.81	33.84	35.10	50.18	56.25	0.41	0.47	0.32	0.41	0.42

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	0	0.00	3.73	0.00	7.88	0.00	34.23	0.00	54.15	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	2	100.00	0.00	0.00	0.48	0.00	19.62	50.00	79.90	50.00	0.00	0.00	0.00	0.00	0.00
State Total	2	100.00	2.00	0.00	4.44	0.00	27.44	50.00	66.11	50.00	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: New Jersey										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Trenton-Ewing, NJ MSA	1,067	80.17	20.71	7.09	17.30	21.15	21.40	28.02	40.58	43.74	3.01	2.04	2.32	4.02	3.22	
<b>Limited Review:</b>																
Allentown-Bethlehem-Easton, PA-NJ MSA	264	19.83	12.10	2.80	13.72	9.35	22.60	21.96	51.59	65.89	4.43	5.00	2.12	3.76	5.80	
<b>State Total</b>	<b>1,331</b>	<b>100.00</b>	<b>18.63</b>	<b>6.27</b>	<b>16.44</b>	<b>18.89</b>	<b>21.69</b>	<b>26.86</b>	<b>43.24</b>	<b>47.99</b>	<b>3.32</b>	<b>2.23</b>	<b>2.29</b>	<b>3.95</b>	<b>3.96</b>	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: New Jersey								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Trenton-Ewing, NJ MSA	53	72.60	20.71	11.63	17.30	20.93	21.40	32.56	40.58	34.88	1.01	0.00	1.12	0.97	1.24
<b>Limited Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	20	27.40	12.10	0.00	13.72	25.00	22.60	12.50	51.59	62.50	0.46	0.00	0.00	0.00	0.94
State Total	73	100.00	18.63	8.47	16.44	22.03	21.69	27.12	43.24	42.37	0.82	0.00	0.85	0.61	1.12

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 19.2% of loans originated and purchased by bank.



**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: New Jersey										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Trenton-Ewing, NJ MSA	2,395	73.76	20.71	5.92	17.30	17.00	21.40	25.05	40.58	52.03	7.22	5.82	6.98	6.79	7.70	
<b>Limited Review:</b>																
Allentown-Bethlehem-Easton, PA-NJ MSA	852	26.24	12.10	3.20	13.72	12.35	22.60	24.24	51.59	60.21	7.14	5.63	8.31	5.95	7.47	
State Total	3,247	100.00	18.63	5.20	16.44	15.77	21.69	24.84	43.24	54.19	7.20	5.80	7.23	6.59	7.64	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 23.6% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: New Jersey			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Trenton-Ewing, NJ MSA	131	62.98	73.97	21.37	85.50	3.82	10.69	0.30	0.06
<b>Limited Review:</b>									
Allentown-Bethlehem-Easton, PA-NJ MSA	77	37.02	80.21	28.57	98.70	0.00	1.30	0.69	0.12
State Total	208	100.00	75.43	24.04	90.38	2.40	7.21	0.41	0.08

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 62.50% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: New Jersey			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Trenton-Ewing, NJ MSA	0	0.00	94.40	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Allentown-Bethlehem-Easton, PA-NJ MSA	2	100.00	98.33	0.00	100.00	0.00	0.00	0.00	0.00
State Total	2	100.00	96.22	0.00	100.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 100% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: New Jersey				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	Evaluation Period	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Trenton-Ewing, NJ MSA	8	2,063	14	6,252	22	8,315	100.00%	1	1
<b>Limited Review:</b>									
Allentown-Bethlehem-Easton, PA-NJ	0	0	0	0	0	0	0.00%	0	0
	8	2,063	14	6,252	22	8,315	100.00%	1	1
Statewide Investments with Potential to Benefit one or more AAs	20	6,323	18	35,660	38	41,983	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	8	28,138	8	28,138	N/A	3	36,688

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: New Jersey																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Trenton-Ewing, NJ MSA	82.48	9	81.82	0.00	0.00	66.67	33.33	4	0	0	0	2	2	11.94	14.87	35.29	37.37
<b>Limited Review:</b>																	
Allentown-Bethlehem-Easton, PA-NJ MSA	17.52	2	18.18	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	2.88	38.14	58.98
State Total	100.00	11	100.00	0.00	0.00	63.64	36.36	4	0	0	0	2	2	9.24	12.16	35.94	42.26

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 2 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		New York						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Rochester, NY MSA	19.04	3,580	419,814	968	126,925	3	279	27	53,252	4,578	600,270	41.31
NM NY - Sullivan County RU	2.64	570	93,906	60	3,335	2	18	3	21,731	635	118,990	1.57
<b>Limited Review:</b>												
Albany-Schenectady-Troy, NY MSA	16.84	3,805	666,720	239	25,764	0	0	7	50,309	4,051	742,793	1.53
Binghamton, NY MSA	3.40	740	75,717	72	2,414	0	0	5	13,485	817	91,616	0.00
Buffalo-Niagara Falls, NY MSA	17.57	3,920	464,411	291	24,249	2	83	12	56,251	4,225	544,994	1.65
Kingston, NY MSA	4.42	935	195,945	127	7,981	1	35	1	250	1,064	204,211	1.73
Poughkeepsie-Newburgh-Middletown, NY MSA	23.76	4,779	1,116,576	923	93,839	5	126	7	16,990	5,714	1,227,531	31.24
Syracuse, NY MSA	12.33	2,402	269,260	557	69,882	2	35	4	14,397	2,965	353,574	20.97
<b>State Total</b>	100	20,731	3,302,349	3,237	354,389	15	576	66	226,665	24,049	3,883,979	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	19	96,222	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	56	177,720	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		New York						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Rochester, NY MSA	72.03	8	116,745	8	116,745	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	42.54
NM NY - Sullivan County RU	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.54
<b>Limited Review:</b>														
Albany-Schenectady-Troy, NY MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.50
Binghamton, NY MSA	0.96	1	1,556	1	1,556	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.00
Buffalo-Niagara Falls, NY MSA	6.70	2	10,858	2	10,858	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.62
Kingston, NY MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.69
Poughkeepsie-Newburgh-Middletown, NY MSA	15.42	4	24,988	4	24,988	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	30.58
Syracuse, NY MSA	4.90	1	7,936	1	7,936	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20.53
<b>State Total</b>	<b>100.00</b>	<b>16</b>	<b>162,083</b>	<b>16</b>	<b>162,083</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>100.00</b>
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	3	12,448	3	12,448	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	1	159	1	159	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rochester, NY MSA	1,916	18.16	3.96	5.32	10.69	11.90	47.31	49.37	38.04	33.40	3.39	3.65	3.04	3.71	3.07
NM NY - Sullivan County RU	261	2.47	0.00	0.00	4.83	3.83	68.51	66.28	26.65	29.89	6.96	0.00	0.00	6.34	8.92
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	1,714	16.25	3.63	3.62	11.14	11.09	49.96	52.68	35.28	32.61	6.67	5.08	5.12	7.28	6.34
Binghamton, NY MSA	439	4.16	1.08	0.46	10.15	9.79	57.25	57.63	31.53	32.12	7.60	0.00	3.07	8.95	7.30
Buffalo-Niagara Falls, NY MSA	2,414	22.88	4.51	0.99	13.06	9.61	49.07	52.73	33.35	36.66	8.10	2.60	6.79	8.66	7.79
Kingston, NY MSA	341	3.23	0.00	0.00	8.34	7.04	76.90	75.37	14.76	17.60	3.47	0.00	1.33	3.08	6.75
Poughkeepsie-Newburgh-Middletown, NY MSA	2,044	19.38	2.07	3.23	8.38	11.89	66.59	63.31	22.96	21.58	6.01	2.36	7.57	5.95	6.13
Syracuse, NY MSA	1,420	13.46	2.64	2.25	10.11	10.85	52.49	55.14	34.76	31.76	4.68	3.23	5.67	4.97	4.08
<b>State Total</b>	<b>10,549</b>	<b>100.00</b>	<b>3.19</b>	<b>2.73</b>	<b>10.68</b>	<b>10.66</b>	<b>53.72</b>	<b>55.76</b>	<b>32.41</b>	<b>30.86</b>	<b>5.73</b>	<b>3.49</b>	<b>5.00</b>	<b>6.12</b>	<b>5.44</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rochester, NY MSA	81	15.14	3.96	6.17	10.69	14.81	47.31	46.91	38.04	32.10	0.23	0.00	0.00	0.26	0.27
NM NY - Sullivan County RU	25	4.67	0.00	0.00	4.83	8.00	68.51	68.00	26.65	24.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	71	13.27	3.63	4.23	11.14	9.86	49.96	49.30	35.28	36.62	0.66	0.00	0.00	0.67	0.86
Binghamton, NY MSA	19	3.55	1.08	0.00	10.15	26.32	57.25	57.89	31.53	15.79	0.00	0.00	0.00	0.00	0.00
Buffalo-Niagara Falls, NY MSA	79	14.77	4.51	3.80	13.06	16.46	49.07	49.37	33.35	30.38	0.65	0.00	0.65	0.50	1.06
Kingston, NY MSA	35	6.54	0.00	0.00	8.34	8.57	76.90	77.14	14.76	14.29	0.56	0.00	0.00	0.77	0.00
Poughkeepsie-Newburgh-Middletown, NY MSA	171	31.96	2.07	1.75	8.38	9.36	66.59	66.67	22.96	22.22	0.87	0.00	1.49	0.56	1.59
Syracuse, NY MSA	54	10.09	2.64	5.56	10.11	11.11	52.49	40.74	34.76	42.59	0.13	0.00	0.00	0.00	0.40
State Total	535	100.00	3.19	3.18	10.68	11.96	53.72	56.64	32.41	28.22	0.40	0.00	0.25	0.35	0.57

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rochester, NY MSA	1,576	16.44	3.96	2.47	10.69	8.19	47.31	45.94	38.04	43.40	2.60	0.00	1.90	2.65	2.70
NM NY - Sullivan County RU	284	2.96	0.00	0.00	4.83	8.80	68.51	64.08	26.65	27.11	6.86	0.00	6.90	7.35	5.93
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	2,003	20.90	3.63	3.49	11.14	8.79	49.96	49.08	35.28	38.64	3.98	2.84	3.10	4.02	4.13
Binghamton, NY MSA	282	2.94	1.08	0.35	10.15	9.22	57.25	57.45	31.53	32.98	1.49	0.00	2.16	1.61	1.24
Buffalo-Niagara Falls, NY MSA	1,417	14.78	4.51	1.41	13.06	8.61	49.07	48.55	33.35	41.43	3.59	0.96	1.51	3.54	3.92
Kingston, NY MSA	553	5.77	0.00	0.00	8.34	9.04	76.90	73.42	14.76	17.54	4.24	0.00	4.84	4.19	4.21
Poughkeepsie-Newburgh-Middletown, NY MSA	2,546	26.56	2.07	3.26	8.38	8.13	66.59	61.39	22.96	27.22	6.06	2.65	4.47	6.00	6.80
Syracuse, NY MSA	925	9.65	2.64	2.70	10.11	7.78	52.49	49.08	34.76	40.43	2.54	1.16	1.48	2.42	2.82
<b>State Total</b>	<b>9,586</b>	<b>100.00</b>	<b>3.19</b>	<b>2.48</b>	<b>10.68</b>	<b>8.42</b>	<b>53.72</b>	<b>53.85</b>	<b>32.41</b>	<b>35.25</b>	<b>3.72</b>	<b>1.80</b>	<b>2.77</b>	<b>3.88</b>	<b>3.73</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rochester, NY MSA	7	11.48	16.50	0.00	18.95	14.29	41.93	57.14	22.62	28.57	0.00	0.00	0.00	0.00	0.00
NM NY - Sullivan County RU	0	0.00	0.00	0.00	4.41	0.00	91.43	0.00	4.16	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	17	27.87	20.20	17.65	14.74	47.06	45.91	23.53	19.16	11.76	0.00	0.00	0.00	0.00	0.00
Binghamton, NY MSA	0	0.00	17.84	0.00	38.06	0.00	28.31	0.00	15.79	0.00	0.00	0.00	0.00	0.00	0.00
Buffalo-Niagara Falls, NY MSA	10	16.39	15.96	0.00	16.16	30.00	41.24	50.00	26.64	20.00	0.00	0.00	0.00	0.00	0.00
Kingston, NY MSA	6	9.84	0.00	0.00	30.39	16.67	63.99	83.33	5.62	0.00	5.56	0.00	0.00	7.69	0.00
Poughkeepsie-Newburgh-Middletown, NY MSA	18	29.51	15.63	11.11	20.85	27.78	59.37	55.56	4.16	5.56	0.00	0.00	0.00	0.00	0.00
Syracuse, NY MSA	3	4.92	26.99	33.33	23.47	33.33	33.12	33.33	16.42	0.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>61</b>	<b>100.00</b>	<b>18.19</b>	<b>9.84</b>	<b>19.62</b>	<b>31.15</b>	<b>43.81</b>	<b>47.54</b>	<b>18.38</b>	<b>11.48</b>	<b>0.39</b>	<b>0.00</b>	<b>0.00</b>	<b>0.85</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: New York						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Rochester, NY MSA	968	29.95	8.95	7.33	12.91	11.78	42.24	43.29	35.79	37.60	0.76	0.75	0.70	0.78	0.77
NM NY - Sullivan County RU	60	1.86	0.00	0.00	6.13	3.33	72.92	73.33	20.94	23.33	0.94	0.00	0.00	1.24	0.36
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	239	7.39	13.19	11.72	11.66	12.97	45.15	43.10	30.00	32.22	0.43	0.46	0.06	0.40	0.57
Binghamton, NY MSA	72	2.23	7.91	13.89	16.07	13.89	48.04	51.39	27.99	20.83	0.24	0.55	0.13	0.33	0.08
Buffalo-Niagara Falls, NY MSA	286	8.85	8.03	10.49	12.64	14.34	43.29	45.10	33.97	30.07	0.48	0.85	0.59	0.54	0.33
Kingston, NY MSA	127	3.93	0.00	0.00	10.80	11.02	75.21	70.08	13.98	18.90	0.30	0.00	0.24	0.37	0.00
Poughkeepsie-Newburgh-Middletown, NY MSA	923	28.56	7.82	11.92	11.65	8.23	61.64	55.90	18.87	23.94	0.94	0.97	1.20	0.93	0.86
Syracuse, NY MSA	557	17.23	13.29	12.93	11.42	8.26	47.05	54.22	28.24	24.60	0.55	0.39	0.62	0.64	0.46
State Total	3,232	100.00	9.26	9.93	12.15	10.33	49.34	50.71	28.81	29.02	0.60	0.64	0.54	0.65	0.55

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: New York						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Rochester, NY MSA	3	20.00	1.12	0.00	5.80	0.00	57.02	66.67	36.06	33.33	0.83	0.00	0.00	0.00	2.38
NM NY - Sullivan County RU	2	13.33	0.00	0.00	3.02	0.00	73.37	50.00	23.62	50.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	0	0.00	2.44	0.00	7.86	0.00	50.42	0.00	39.28	0.00	0.00	0.00	0.00	0.00	0.00
Binghamton, NY MSA	0	0.00	1.59	0.00	5.82	0.00	73.02	0.00	19.58	0.00	0.00	0.00	0.00	0.00	0.00
Buffalo-Niagara Falls, NY MSA	2	13.33	1.80	0.00	4.64	50.00	54.12	0.00	38.83	50.00	1.96	0.00	33.33	0.00	0.00
Kingston, NY MSA	1	6.67	0.00	0.00	6.19	0.00	72.79	0.00	21.02	100.00	0.00	0.00	0.00	0.00	0.00
Poughkeepsie-Newburgh-Middletown, NY MSA	5	33.33	1.04	0.00	7.24	0.00	65.56	100.00	26.16	0.00	3.33	0.00	0.00	5.41	0.00
Syracuse, NY MSA	2	13.33	1.49	0.00	5.80	0.00	50.70	100.00	42.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>15</b>	<b>100.00</b>	<b>1.36</b>	<b>0.00</b>	<b>6.12</b>	<b>6.67</b>	<b>58.72</b>	<b>66.67</b>	<b>33.70</b>	<b>26.67</b>	<b>0.99</b>	<b>0.00</b>	<b>7.69</b>	<b>0.74</b>	<b>0.88</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: New York								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rochester, NY MSA	1,916	18.16	19.48	13.57	17.77	30.59	22.36	26.29	40.38	29.56	3.45	4.26	3.99	3.43	2.53
NM NY - Sullivan County RU	261	2.47	20.44	0.97	16.58	8.74	20.32	19.90	42.65	70.39	7.38	0.00	9.38	3.62	9.31
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	1,714	16.25	19.48	8.08	18.02	26.03	22.43	28.90	40.06	36.98	6.94	7.15	6.90	7.64	6.27
Binghamton, NY MSA	439	4.16	18.66	12.44	18.65	36.32	22.83	30.10	39.86	21.14	7.74	8.89	10.42	10.04	3.29
Buffalo-Niagara Falls, NY MSA	2,414	22.88	20.40	10.06	17.81	30.76	21.91	29.46	39.88	29.73	8.70	8.58	9.74	9.03	7.17
Kingston, NY MSA	341	3.23	19.23	1.72	18.20	18.97	23.74	27.24	38.83	52.07	3.57	1.49	5.51	4.23	2.17
Poughkeepsie-Newburgh-Middletown, NY MSA	2,044	19.38	19.14	3.65	18.04	19.34	24.40	33.35	38.41	43.66	6.34	3.64	6.74	7.25	5.61
Syracuse, NY MSA	1,420	13.46	20.02	10.13	17.80	31.59	21.49	28.82	40.68	29.45	4.64	5.48	5.23	5.03	3.45
State Total	10,549	100.00	19.68	8.82	17.91	27.32	22.49	29.19	39.92	34.67	5.96	6.11	6.64	6.46	4.80

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.4% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: New York								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Rochester, NY MSA	81	15.14	19.48	12.00	17.77	26.67	22.36	16.00	40.38	45.33	0.23	0.00	0.18	0.16	0.42
NM NY - Sullivan County RU	25	4.67	20.44	0.00	16.58	11.11	20.32	22.22	42.65	66.67	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Albany-Schenectady-Troy, NY MSA	71	13.27	19.48	6.56	18.02	22.95	22.43	31.15	40.06	39.34	0.67	0.00	1.16	1.17	0.21
Binghamton, NY MSA	19	3.55	18.66	23.53	18.65	23.53	22.83	23.53	39.86	29.41	0.00	0.00	0.00	0.00	0.00
Buffalo-Niagara Falls, NY MSA	79	14.77	20.40	5.71	17.81	18.57	21.91	28.57	39.88	47.14	0.67	0.00	0.31	1.51	0.74
Kingston, NY MSA	35	6.54	19.23	9.38	18.20	6.25	23.74	37.50	38.83	46.88	0.56	0.00	0.00	0.86	0.76
Poughkeepsie-Newburgh-Middletown, NY MSA	171	31.96	19.14	3.60	18.04	16.55	24.40	33.81	38.41	46.04	0.88	0.00	0.53	1.77	0.62
Syracuse, NY MSA	54	10.09	20.02	17.39	17.80	19.57	21.49	32.61	40.68	30.43	0.13	0.66	0.00	0.00	0.18
State Total	535	100.00	19.68	8.08	17.91	19.00	22.49	29.04	39.92	43.89	0.41	0.11	0.32	0.65	0.37

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 14.4% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: New York										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Rochester, NY MSA	1,576	16.44	19.48	7.79	17.77	22.27	22.36	26.83	40.38	43.12	2.72	1.46	3.04	2.64	2.79	
NM NY - Sullivan County RU	284	2.96	20.44	4.98	16.58	9.95	20.32	26.24	42.65	58.82	7.94	10.53	6.67	6.75	8.57	
<b>Limited Review:</b>																
Albany-Schenectady-Troy, NY MSA	2,003	20.90	19.48	7.17	18.02	22.08	22.43	27.10	40.06	43.65	4.67	6.08	4.98	4.41	4.52	
Binghamton, NY MSA	282	2.94	18.66	10.00	18.65	30.00	22.83	25.71	39.86	34.29	1.44	1.23	2.20	1.22	1.33	
Buffalo-Niagara Falls, NY MSA	1,417	14.78	20.40	5.78	17.81	21.60	21.91	32.18	39.88	40.44	3.79	2.52	3.97	4.04	3.73	
Kingston, NY MSA	553	5.77	19.23	6.07	18.20	21.50	23.74	24.30	38.83	48.13	4.65	4.58	6.21	4.28	4.27	
Poughkeepsie-Newburgh-Middletown, NY MSA	2,546	26.56	19.14	5.54	18.04	19.67	24.40	32.49	38.41	42.30	6.79	5.25	8.43	6.92	6.16	
Syracuse, NY MSA	925	9.65	20.02	8.10	17.80	22.61	21.49	29.02	40.68	40.26	2.65	2.88	3.67	2.86	2.13	
State Total	9,586	100.00	19.68	6.69	17.91	21.30	22.49	29.17	39.92	42.84	4.09	3.61	4.74	4.15	3.84	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 18.1% of loans originated and purchased by bank.



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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: New York			Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share		
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less	
<b>Full Review:</b>										
Rochester, NY MSA	968	29.90	76.32	50.31	80.06	7.13	12.81	0.76	0.64	
NM NY - Sullivan County RU	60	1.85	75.32	21.67	93.33	1.67	5.00	0.94	0.00	
<b>Limited Review:</b>										
Albany-Schenectady-Troy, NY MSA	239	7.38	72.85	6.28	82.43	6.69	10.88	0.43	0.08	
Binghamton, NY MSA	72	2.22	73.09	0.00	98.61	1.39	0.00	0.24	0.00	
Buffalo-Niagara Falls, NY MSA	291	8.99	73.58	1.37	84.19	5.15	10.65	0.48	0.00	
Kingston, NY MSA	127	3.92	79.61	22.83	88.19	7.09	4.72	0.30	0.14	
Poughkeepsie-Newburgh-Middletown, NY MSA	923	28.51	78.60	42.15	83.32	7.15	9.53	0.94	0.95	
Syracuse, NY MSA	557	17.21	75.09	37.34	81.15	5.57	13.29	0.55	0.24	
State Total	3,237	100.00	75.35	35.37	82.70	6.43	10.87	0.60	0.34	

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 38.15% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: New York			Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share		
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less	
<b>Full Review:</b>										
Rochester, NY MSA	3	20.00	95.68	0.00	66.67	33.33	0.00	0.83	0.00	
NM NY - Sullivan County RU	2	13.33	97.49	50.00	100.00	0.00	0.00	0.00	0.00	
<b>Limited Review:</b>										
Albany-Schenectady-Troy, NY MSA	0	0.00	96.28	0.00	0.00	0.00	0.00	0.00	0.00	
Binghamton, NY MSA	0	0.00	97.35	0.00	0.00	0.00	0.00	0.00	0.00	
Buffalo-Niagara Falls, NY MSA	2	13.33	94.67	0.00	100.00	0.00	0.00	1.96	0.00	
Kingston, NY MSA	1	6.67	96.02	100.00	100.00	0.00	0.00	0.00	0.00	
Poughkeepsie-Newburgh-Middletown, NY MSA	5	33.33	95.56	20.00	100.00	0.00	0.00	3.33	0.00	
Syracuse, NY MSA	2	13.33	95.34	50.00	100.00	0.00	0.00	0.00	0.00	
State Total	15	100.00	95.68	26.67	93.33	6.67	0.00	0.99	0.00	

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 66.67% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
		Geography: New York				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Rochester, NY MSA	27	5,387	69	33,163	96	38,550	32.02%	0	0
NM NY - Sullivan County RU	0	0	1	864	1	864	0.72%	0	0
<b>Limited Review:</b>									
Albany-Schenectady-Troy, NY MSA	9	1,973	10	12,752	19	14,725	12.23%	4	6,282
Binghamton, NY MSA	10	2,864	6	478	16	3,342	2.78%	3	124
Buffalo-Niagara Falls, NY MSA	23	11,940	24	4,192	47	16,132	13.40%	1	22
Kingston, NY MSA	3	10,999	0	0	3	10,999	9.13%	3	267
Poughkeepsie-Newburgh-Middletown, NY MSA	16	13,657	7	19,392	23	33,049	27.45%	7	8,353
Syracuse, NY MSA	10	1,085	26	1,662	36	2,747	2.28%	2	51
	98	47,905	143	72,503	241	120,408	100.00%	20	15,099
Statewide Investments with Potential to Benefit one or more AAs	29	4,543	17	28,807	46	33,350	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	6	29,057	6	29,057	N/A	2	1,985

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: New York																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Rochester, NY MSA	41.31	28	34.15	7.14	7.14	57.14	25.00	0	0	0	0	0	0	9.75	13.51	44.37	31.97
NM NY - Sullivan County RU	1.57	2	2.44	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	5.97	71.66	22.37
<b>Limited Review:</b>																	
Albany-Schenectady-Troy, NY MSA	1.53	1	1.22	0.00	0.00	100.00	0.00	0	0	0	0	0	0	9.18	15.26	46.56	28.96
Binghamton, NY MSA	0.00	1	1.22	0.00	0.00	0.00	100.00	0	0	0	0	0	0	3.13	16.30	51.62	28.94
Buffalo-Niagara Falls, NY MSA	1.65	1	1.22	100.00	0.00	0.00	0.00	1	0	1	0	0	0	8.98	16.77	44.76	28.49
Elmira, NY MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	1	0	-1	0	0	2.98	15.65	57.50	21.84
Kingston, NY MSA	1.73	2	2.44	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	11.46	75.10	13.44
Poughkeepsie-Newburgh-Middletown, NY MSA	31.24	34	41.46	8.82	8.82	67.65	14.71	3	0	0	1	2	0	7.18	11.97	62.07	18.75
Syracuse, NY MSA	20.97	13	15.85	23.08	0.00	61.54	15.38	0	0	0	0	0	0	9.20	14.44	46.20	30.16
Utica-Rome, NY MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	1	-1	0	0	0	7.58	14.97	51.87	25.56
State Total	100.00	82	100.00	10.98	6.10	62.20	19.51	4	3	0	0	1	0	7.95	14.42	50.13	27.16

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Ohio						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Columbus, OH MSA	34.05	24,819	4,304,436	3,200	382,760	41	5,200	25	58,841	28,085	4,751,237	49.36
<b>Limited Review:</b>												
Akron, OH MSA	10.50	7,516	1,063,229	1,139	149,361	4	149	1	250	8,660	1,212,989	7.93
Canton-Massillon, OH MSA	5.22	3,646	441,558	654	92,819	2	70	4	351	4,306	534,798	3.55
Cleveland-Elyria-Mentor, OH MSA	22.08	15,964	2,405,329	2,237	326,766	3	97	14	37,327	18,218	2,769,519	12.58
Dayton, OH MSA	8.41	6,083	785,082	848	119,756	5	247	5	4,945	6,941	910,030	10.04
Lima, OH MSA	1.44	1,035	108,004	146	32,685	5	920	0	0	1,186	141,609	2.44
Mansfield, OH MSA	1.27	951	101,756	100	15,229	0	0	0	0	1,051	116,985	0.89
Parkersburg-Marietta-Vienna, WV-OH MSA	1.05	727	82,034	139	25,131	2	104	0	0	868	107,269	0.84
Springfield, OH MSA	0.03	20	2,785	4	1,017	0	0	1	2,325	25	6,127	0.00
Steubenville-Weirton, OH-WV MSA	0.29	191	16,380	46	2,961	0	0	0	0	237	19,341	0.56
Youngstown-Warren-Boardman, OH-PA MSA	4.54	3,308	353,416	432	74,330	2	350	1	50	3,743	428,146	4.14
Non-Metro OH	11.12	8,167	889,020	946	150,217	55	7,662	5	1,734	9,173	1,048,633	7.67
<b>State Total</b>	<b>100.00</b>	<b>72,427</b>	<b>10,553,029</b>	<b>9,891</b>	<b>1,373,032</b>	<b>119</b>	<b>14,799</b>	<b>56</b>	<b>105,823</b>	<b>82,493</b>	<b>12,046,683</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	7	8,185	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	340	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Ohio										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Columbus, OH MSA	100.00	2	6,008	2	6,008	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	49.36	
<b>Limited Review:</b>															
Akron, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.93	
Canton-Massillon, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.55	
Cleveland-Elyria-Mentor, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12.58	
Dayton, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.04	
Lima, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.44	
Mansfield, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.89	
Parkersburg-Marietta-Vienna, WV-OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.84	
Springfield, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.00	
Spanglersville, OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.56	
Youngstown-Warren-Boardman, OH-PA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.14	
Non-Metro OH	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.67	
	100.00	2	6,008	2	6,008	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Ohio								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Columbus, OH MSA	9,477	33.41	2.94	1.94	17.78	10.47	45.51	42.38	33.77	45.21	7.45	4.72	6.13	7.78	7.57
<b>Limited Review:</b>															
Akron, OH MSA	2,749	9.69	2.76	1.31	18.38	12.08	51.56	54.17	27.30	32.45	7.52	7.14	5.48	8.41	6.93
Canton-Massillon, OH MSA	1,272	4.48	0.97	0.39	14.47	9.12	64.26	67.69	20.29	22.80	6.32	0.00	5.16	6.71	5.72
Cleveland-Elyria-Mentor, OH MSA	6,604	23.28	5.05	3.18	12.97	7.16	46.52	48.53	35.46	41.13	7.02	2.31	4.54	7.39	7.24
Dayton, OH MSA	2,129	7.51	1.91	0.70	17.03	13.25	51.27	53.17	29.78	32.88	4.47	0.00	3.84	5.27	3.59
Lima, OH MSA	342	1.21	1.24	0.00	19.97	11.70	56.56	56.73	22.23	31.58	9.82	0.00	13.04	9.74	8.70
Mansfield, OH MSA	367	1.29	0.16	0.00	14.17	7.36	58.08	58.31	27.58	34.33	8.92	0.00	4.76	7.80	11.56
Parkersburg-Marietta-Vienna, WV-OH MSA	232	0.82	0.00	0.00	6.61	12.93	83.30	71.12	10.09	15.95	10.08	0.00	13.46	9.42	11.54
Springfield, OH MSA	11	0.04	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.70	0.00	0.00	8.70	0.00
Steubenville-Weirton, OH-WV MSA	80	0.28	1.92	0.00	11.44	3.75	79.70	91.25	6.95	5.00	5.69	0.00	6.25	5.46	8.33
Youngstown-Warren-Boardman, OH-PA MSA	1,254	4.42	2.87	0.32	12.93	5.10	58.89	61.16	25.30	33.41	8.05	0.00	3.28	8.69	7.77
Non-Metro OH	3,849	13.57	0.03	0.00	8.49	5.92	72.98	73.94	18.50	20.14	12.77	0.00	8.24	13.58	11.51
<b>State Total</b>	<b>28,366</b>	<b>100.00</b>	<b>2.80</b>	<b>1.60</b>	<b>14.49</b>	<b>9.12</b>	<b>53.54</b>	<b>52.79</b>	<b>29.17</b>	<b>36.49</b>	<b>7.43</b>	<b>3.71</b>	<b>5.56</b>	<b>8.09</b>	<b>7.11</b>

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Ohio								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Columbus, OH MSA	302	29.84	2.94	3.31	17.78	16.89	45.51	43.38	33.77	36.42	2.17	0.00	0.83	1.73	3.38
<b>Limited Review:</b>															
Akron, OH MSA	99	9.78	2.76	1.01	18.38	21.21	51.56	52.53	27.30	25.25	0.97	0.00	0.00	0.97	1.92
Canton-Massillon, OH MSA	71	7.02	0.97	1.41	14.47	15.49	64.26	67.61	20.29	15.49	0.72	0.00	1.28	0.75	0.00
Cleveland-Elyria-Mentor, OH MSA	185	18.28	5.05	10.81	12.97	13.51	46.52	41.62	35.46	34.05	0.72	0.79	0.28	0.69	0.96
Dayton, OH MSA	113	11.17	1.91	4.42	17.03	18.58	51.27	51.33	29.78	25.66	0.47	0.00	1.64	0.00	0.71
Lima, OH MSA	29	2.87	1.24	0.00	19.97	17.24	56.56	55.17	22.23	27.59	0.00	0.00	0.00	0.00	0.00
Mansfield, OH MSA	21	2.08	0.16	0.00	14.17	14.29	58.08	80.95	27.58	4.76	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta-Vienna, WV-OH MSA	8	0.79	0.00	0.00	6.61	12.50	83.30	87.50	10.09	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH-WV MSA	5	0.49	1.92	0.00	11.44	80.00	79.70	20.00	6.95	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman, OH-PA MSA	44	4.35	2.87	2.27	12.93	20.45	58.89	52.27	25.30	25.00	0.35	0.00	2.63	0.00	0.53
Non-Metro OH	135	13.34	0.03	0.00	8.49	15.56	72.98	66.67	18.50	17.78	0.59	0.00	1.85	0.64	0.00
<b>State Total</b>	<b>1,012</b>	<b>100.00</b>	<b>2.80</b>	<b>3.75</b>	<b>14.49</b>	<b>17.00</b>	<b>53.54</b>	<b>51.38</b>	<b>29.17</b>	<b>27.87</b>	<b>0.92</b>	<b>0.47</b>	<b>0.75</b>	<b>0.69</b>	<b>1.43</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Ohio									Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Columbus, OH MSA	15,022	34.98	2.94	1.59	17.78	8.07	45.51	36.23	33.77	54.11	8.72	4.61	4.93	7.47	10.30
<b>Limited Review:</b>															
Akron, OH MSA	4,663	10.86	2.76	1.39	18.38	10.47	51.56	51.28	27.30	36.86	6.72	2.03	4.65	7.14	6.71
Canton-Massillon, OH MSA	2,302	5.36	0.97	0.22	14.47	8.73	64.26	62.42	20.29	28.63	6.28	0.00	4.49	6.10	6.99
Cleveland-Elyria-Mentor, OH MSA	9,110	21.21	5.05	2.71	12.97	8.29	46.52	42.26	35.46	46.74	4.90	2.74	4.11	4.50	5.31
Dayton, OH MSA	3,834	8.93	1.91	1.49	17.03	12.68	51.27	45.20	29.78	40.64	3.66	1.06	3.05	3.43	4.01
Lima, OH MSA	664	1.55	1.24	0.45	19.97	10.84	56.56	51.81	22.23	36.90	4.82	0.00	3.73	4.12	6.33
Mansfield, OH MSA	561	1.31	0.16	0.00	14.17	8.91	58.08	55.97	27.58	35.12	6.04	0.00	3.23	6.14	6.22
Parkersburg-Marietta-Vienna, WV-OH MSA	487	1.13	0.00	0.00	6.61	7.80	83.30	80.70	10.09	11.50	13.18	0.00	17.24	12.50	16.42
Springfield, OH MSA	9	0.02	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	1.59	0.00	0.00	1.59	0.00
Steubenville-Wenton, OH-WV MSA	106	0.25	1.92	0.00	11.44	4.72	79.70	88.68	6.95	6.60	5.20	0.00	0.00	5.80	2.94
Youngstown-Warren-Boardman, OH-PA MSA	2,010	4.68	2.87	0.50	12.93	5.87	58.89	55.02	25.30	38.61	6.19	3.85	2.98	6.05	6.72
Non-Metro OH	4,178	9.73	0.03	0.07	8.49	5.96	72.98	69.55	18.50	24.41	5.55	40.00	3.89	5.66	5.47
<b>State Total</b>	<b>42,946</b>	<b>100.00</b>	<b>2.80</b>	<b>1.46</b>	<b>14.49</b>	<b>8.56</b>	<b>53.54</b>	<b>46.61</b>	<b>29.17</b>	<b>43.36</b>	<b>6.35</b>	<b>3.48</b>	<b>4.34</b>	<b>5.85</b>	<b>7.19</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Ohio								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Columbus, OH MSA	17	16.67	12.26	29.41	31.69	23.53	34.98	47.06	21.07	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Akron, OH MSA	5	4.90	12.03	0.00	24.76	40.00	44.88	40.00	18.33	20.00	0.00	0.00	0.00	0.00	0.00
Canton-Massillon, OH MSA	1	0.98	6.09	0.00	16.03	0.00	49.26	100.00	28.62	0.00	0.00	0.00	0.00	0.00	0.00
Cleveland-Elyria-Mentor, OH MSA	65	63.73	12.95	24.62	25.53	36.92	43.81	21.54	17.71	16.92	0.00	0.00	0.00	0.00	0.00
Dayton, OH MSA	7	6.86	8.55	0.00	21.41	42.86	48.98	57.14	21.05	0.00	0.00	0.00	0.00	0.00	0.00
Lima, OH MSA	0	0.00	10.31	0.00	43.37	0.00	37.90	0.00	8.43	0.00	0.00	0.00	0.00	0.00	0.00
Mansfield, OH MSA	2	1.96	1.06	0.00	25.75	0.00	53.27	50.00	19.92	50.00	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta-Vienna, WV-OH MSA	0	0.00	0.00	0.00	26.55	0.00	73.45	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH-WV MSA	0	0.00	1.73	0.00	52.11	0.00	37.00	0.00	9.16	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman, OH-PA MSA	0	0.00	7.91	0.00	14.89	0.00	59.66	0.00	17.53	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro OH	5	4.90	3.24	0.00	14.06	20.00	64.55	60.00	18.15	20.00	0.00	0.00	0.00	0.00	0.00
<b>State Total</b>	<b>102</b>	<b>100.00</b>	<b>10.97</b>	<b>20.59</b>	<b>25.53</b>	<b>33.33</b>	<b>44.18</b>	<b>32.35</b>	<b>19.31</b>	<b>13.73</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Ohio								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Columbus, OH MSA	3,200	32.46	6.76	4.81	18.03	15.44	40.01	37.03	35.19	42.72	1.06	1.16	1.08	1.03	1.06
<b>Limited Review:</b>															
Akron, OH MSA	1,139	11.55	8.70	10.01	13.69	15.28	44.03	40.04	33.58	34.68	1.16	1.98	1.38	0.85	1.31
Canton-Massillon, OH MSA	654	6.63	3.53	5.81	14.21	11.01	56.97	51.53	25.29	31.65	1.23	1.89	1.45	1.13	1.29
Cleveland-Elyria-Mentor, OH MSA	2,208	22.40	7.45	4.71	14.33	12.77	38.95	37.82	38.62	44.70	0.83	0.70	1.05	0.80	0.81
Dayton, OH MSA	848	8.60	5.73	7.31	18.23	20.17	45.56	37.15	30.49	35.38	0.71	1.64	0.92	0.58	0.67
Lima, OH MSA	146	1.48	8.25	6.16	20.02	26.03	51.48	37.67	20.25	30.14	0.77	0.87	1.69	0.37	1.02
Mansfield, OH MSA	100	1.01	3.01	11.00	17.95	23.00	53.12	38.00	25.91	28.00	0.32	0.52	0.15	0.41	0.23
Parkersburg-Marietta-Vienna, WV-OH MSA	139	1.41	0.00	0.00	20.24	23.74	73.35	69.06	6.41	7.19	1.28	0.00	2.35	1.14	0.00
Springfield, OH MSA	4	0.04	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH-WV MSA	46	0.47	2.56	0.00	24.58	21.74	63.50	65.22	9.37	13.04	1.09	0.00	1.97	1.01	0.00
Youngstown-Warren-Boardman, OH-PA MSA	429	4.35	4.58	3.50	13.58	16.78	50.04	48.95	31.55	30.77	0.89	1.21	1.25	0.85	0.81
Non-Metro OH	946	9.60	0.22	0.11	10.03	7.61	72.48	71.04	17.27	21.25	0.80	0.00	0.78	0.84	0.66
State Total	9,859	100.00	5.82	5.15	15.28	14.62	46.88	42.94	31.83	37.30	0.92	1.19	1.08	0.85	0.91

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Ohio						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Columbus, OH MSA	41	34.45	1.14	0.00	10.37	9.76	60.53	75.61	27.96	14.63	0.98	0.00	0.00	1.38	0.00
<b>Limited Review:</b>															
Akron, OH MSA	4	3.36	2.51	0.00	7.52	0.00	60.47	75.00	29.51	25.00	0.00	0.00	0.00	0.00	0.00
Canton-Massillon, OH MSA	2	1.68	0.85	0.00	6.58	0.00	73.99	100.00	18.58	0.00	0.00	0.00	0.00	0.00	0.00
Cleveland-Elyria-Mentor, OH MSA	3	2.52	1.87	0.00	6.54	0.00	44.66	66.67	46.82	33.33	1.41	0.00	0.00	3.33	0.00
Dayton, OH MSA	5	4.20	0.51	0.00	7.15	20.00	74.06	80.00	18.28	0.00	0.00	0.00	0.00	0.00	0.00
Lima, OH MSA	5	4.20	0.22	0.00	1.52	0.00	77.49	100.00	20.78	0.00	1.13	0.00	0.00	1.41	0.00
Mansfield, OH MSA	0	0.00	0.26	0.00	3.39	0.00	71.54	0.00	24.80	0.00	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta-Vienna, WV-OH MSA	2	1.68	0.00	0.00	4.57	0.00	82.19	0.00	13.24	100.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH MSA	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH-WV MSA	0	0.00	4.55	0.00	4.55	0.00	86.36	0.00	4.55	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman, OH-PA MSA	2	1.68	1.08	0.00	5.17	0.00	64.38	100.00	29.36	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro OH	55	46.22	0.02	0.00	1.72	1.82	75.43	76.36	22.84	21.82	1.86	0.00	0.00	2.10	1.12
<b>State Total</b>	<b>119</b>	<b>100.00</b>	<b>0.86</b>	<b>0.00</b>	<b>5.73</b>	<b>5.04</b>	<b>66.02</b>	<b>76.47</b>	<b>27.37</b>	<b>18.49</b>	<b>1.17</b>	<b>0.00</b>	<b>0.00</b>	<b>1.40</b>	<b>0.53</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Ohio								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Columbus, OH MSA	9,477	33.41	19.49	10.39	18.45	27.25	23.08	27.28	38.98	35.08	7.25	7.52	7.93	7.34	6.35
<b>Limited Review:</b>															
Akron, OH MSA	2,749	9.69	19.24	13.43	18.62	29.74	23.21	25.06	38.93	31.77	8.36	9.18	9.57	7.62	7.26
Canton-Massillon, OH MSA	1,272	4.48	17.55	12.20	19.24	29.70	23.89	29.09	39.32	29.01	6.31	6.51	6.49	6.83	5.51
Cleveland-Elyria-Mentor, OH MSA	6,604	23.28	20.60	12.14	18.06	27.86	22.06	26.61	39.28	33.39	7.57	7.91	8.19	7.67	6.66
Dayton, OH MSA	2,129	7.51	19.16	13.28	18.89	29.15	22.87	26.12	39.08	31.46	3.88	3.62	4.34	3.86	3.58
Lima, OH MSA	342	1.21	19.16	17.88	18.83	28.83	22.82	29.56	39.19	23.72	7.05	12.68	6.41	8.42	3.07
Mansfield, OH MSA	367	1.29	17.95	11.48	19.32	34.10	23.37	29.51	39.36	24.92	6.24	8.20	5.09	8.77	3.85
Parkersburg-Marietta-Vienna, WV-OH MSA	232	0.82	17.32	10.91	19.18	17.27	22.01	30.00	41.49	41.82	10.91	10.20	10.92	12.60	9.66
Springfield, OH MSA	11	0.04	20.62	50.00	25.02	25.00	30.98	25.00	23.37	0.00	4.65	14.29	0.00	0.00	0.00
Springfield, OH-WV MSA	80	0.28	20.23	10.81	18.99	40.54	21.06	24.32	39.72	24.32	5.70	19.05	8.77	3.64	0.00
Youngstown-Warren-Boardman, OH-PA MSA	1,254	4.42	18.85	12.20	18.37	29.53	22.08	28.14	40.70	30.14	7.44	6.87	7.96	7.94	6.67
Non-Metro OH	3,849	13.57	16.28	10.00	18.68	34.62	24.64	29.79	40.39	25.58	7.42	8.32	8.80	7.93	5.15
<b>State Total</b>	<b>28,366</b>	<b>100.00</b>	<b>19.14</b>	<b>11.60</b>	<b>18.51</b>	<b>28.91</b>	<b>22.94</b>	<b>27.27</b>	<b>39.41</b>	<b>32.21</b>	<b>7.03</b>	<b>7.40</b>	<b>7.73</b>	<b>7.14</b>	<b>6.03</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.6% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Ohio								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Columbus, OH MSA	302	29.84	19.49	14.98	18.45	22.27	23.08	22.27	38.98	40.49	2.07	1.83	2.03	0.86	2.88
<b>Limited Review:</b>															
Akron, OH MSA	99	9.78	19.24	10.71	18.62	27.38	23.21	23.81	38.93	38.10	1.01	0.00	0.61	2.11	1.04
Canton-Massillon, OH MSA	71	7.02	17.55	16.42	19.24	32.84	23.89	19.40	39.32	31.34	0.76	0.00	0.00	1.03	2.27
Cleveland-Elyria-Mentor, OH MSA	185	18.28	20.60	14.19	18.06	16.22	22.06	29.73	39.28	39.86	0.74	0.00	0.34	1.59	0.82
Dayton, OH MSA	113	11.17	19.16	14.85	18.89	16.83	22.87	24.75	39.08	43.56	0.49	0.69	0.49	0.00	0.74
Lima, OH MSA	29	2.87	19.16	3.57	18.83	39.29	22.82	21.43	39.19	35.71	0.00	0.00	0.00	0.00	0.00
Mansfield, OH MSA	21	2.08	17.95	23.53	19.32	11.76	23.37	47.06	39.36	17.65	0.00	0.00	0.00	0.00	0.00
Parkersburg-Marietta-Vienna, WV-OH MSA	8	0.79	17.32	12.50	19.18	12.50	22.01	50.00	41.49	25.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH MSA	0	0.00	20.62	0.00	25.02	0.00	30.98	0.00	23.37	0.00	0.00	0.00	0.00	0.00	0.00
Springfield, OH-WV MSA	5	0.49	20.23	20.00	18.99	60.00	21.06	20.00	39.72	0.00	0.00	0.00	0.00	0.00	0.00
Youngstown-Warren-Boardman, OH-PA MSA	44	4.35	18.85	20.51	18.37	25.64	22.08	20.51	40.70	33.33	0.36	0.00	1.47	0.00	0.00
Non-Metro OH	135	13.34	16.28	11.76	18.68	28.57	24.64	23.53	40.39	36.13	0.62	2.04	0.53	0.00	0.69
<b>State Total</b>	<b>1,012</b>	<b>100.00</b>	<b>19.14</b>	<b>14.14</b>	<b>18.51</b>	<b>23.41</b>	<b>22.94</b>	<b>24.57</b>	<b>39.41</b>	<b>37.89</b>	<b>0.92</b>	<b>0.57</b>	<b>0.73</b>	<b>0.85</b>	<b>1.25</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 14.7% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Ohio										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Columbus, OH MSA	15,023	34.98	19.49	5.89	18.45	16.64	23.08	25.85	38.98	51.62	8.86	6.01	7.54	8.46	9.87	
<b>Limited Review:</b>																
Akron, OH MSA	4,663	10.86	19.24	9.30	18.62	20.55	23.21	26.18	38.93	43.97	7.70	7.96	7.71	7.22	7.91	
Canton-Massillon, OH MSA	2,302	5.36	17.55	8.77	19.24	24.15	23.89	27.71	39.32	39.37	7.19	5.81	8.23	6.87	7.16	
Cleveland-Elyria-Mentor, OH MSA	9,110	21.21	20.60	7.65	18.06	19.20	22.06	25.85	39.28	47.30	5.38	4.49	5.25	5.27	5.60	
Dayton, OH MSA	3,834	8.93	19.16	8.61	18.89	21.56	22.87	27.36	39.08	42.47	3.87	2.69	3.78	4.07	3.97	
Lima, OH MSA	664	1.55	19.16	8.63	18.83	24.87	22.82	29.44	39.19	37.06	4.81	4.13	4.80	5.22	4.67	
Mansfield, OH MSA	561	1.31	17.95	10.13	19.32	25.32	23.37	28.06	39.36	36.50	6.55	6.15	8.06	5.59	6.36	
Parkersburg-Marietta-Vienna, WV-OH MSA	487	1.13	17.32	5.71	19.18	17.12	22.01	29.22	41.49	47.95	14.20	9.68	12.35	13.59	15.72	
Springfield, OH MSA	9	0.02	20.62	0.00	25.02	25.00	30.98	37.50	23.37	37.50	0.00	0.00	0.00	0.00	0.00	
Staubsville-Weirton, OH-WV MSA	106	0.25	20.23	7.69	18.99	27.47	21.06	23.08	39.72	41.76	5.67	6.45	6.06	4.31	6.29	
Youngstown-Warren-Boardman, OH-PA MSA	2,010	4.68	18.85	6.45	18.37	19.57	22.08	29.53	40.70	44.44	6.93	5.37	6.72	7.58	6.88	
Non-Metro OH	4,178	9.73	16.28	7.23	18.68	21.56	24.64	29.69	40.39	41.52	6.05	5.12	6.10	6.25	6.03	
<b>State Total</b>	<b>42,947</b>	<b>100.00</b>	<b>19.14</b>	<b>7.31</b>	<b>18.51</b>	<b>19.42</b>	<b>22.94</b>	<b>26.84</b>	<b>39.41</b>	<b>46.43</b>	<b>6.75</b>	<b>5.28</b>	<b>6.36</b>	<b>6.61</b>	<b>7.18</b>	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 19.6% of loans originated and purchased by bank.

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Ohio			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Columbus, OH MSA	3,200	32.35	75.84	52.91	78.41	9.25	12.34	1.06	0.98
<b>Limited Review:</b>									
Akron, OH MSA	1,139	11.52	75.50	29.68	76.65	8.43	14.93	1.16	0.43
Canton-Massillon, OH MSA	654	6.61	76.63	39.14	73.39	11.47	15.14	1.23	1.07
Cleveland-Elyria-Mentor, OH MSA	2,237	22.62	74.70	26.78	70.59	12.20	17.21	0.84	0.37
Dayton, OH MSA	848	8.57	75.73	31.49	68.99	16.04	14.98	0.71	0.45
Lima, OH MSA	146	1.48	74.24	36.30	50.00	19.18	30.82	0.77	1.08
Mansfield, OH MSA	100	1.01	74.16	28.00	68.00	13.00	19.00	0.32	0.17
Parkersburg-Marietta-Vienna, WV-OH MSA	139	1.41	75.74	33.09	51.08	25.90	23.02	1.28	1.20
Springfield, OH MSA	4	0.04	74.15	0.00	50.00	0.00	50.00	0.00	0.00
Springfield, OH MSA	46	0.47	72.14	28.26	84.78	10.87	4.35	1.09	0.00
Youngstown-Warren-Boardman, OH-PA MSA	432	4.37	75.04	31.71	62.04	18.06	19.91	0.91	1.00
Non-Metro OH	946	9.56	77.04	32.03	66.28	15.12	18.60	0.80	0.53
State Total	9,891	100.00	75.55	37.74	72.53	11.92	15.55	0.92	0.63

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 29.49% of small loans to businesses originated and purchased by the bank.



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

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Ohio			Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share		
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less	
<b>Full Review:</b>										
Columbus, OH MSA	41	34.45	96.82	68.29	60.98	21.95	17.07	0.98	0.00	
<b>Limited Review:</b>										
Akron, OH MSA	4	3.36	96.85	75.00	100.00	0.00	0.00	0.00	0.00	
Canton-Massillon, OH MSA	2	1.68	97.98	100.00	100.00	0.00	0.00	0.00	0.00	
Cleveland-Elyria-Mentor, OH MSA	3	2.52	95.83	33.33	100.00	0.00	0.00	1.41	0.00	
Dayton, OH MSA	5	4.20	97.77	80.00	100.00	0.00	0.00	0.00	0.00	
Lima, OH MSA	5	4.20	97.84	60.00	60.00	20.00	20.00	1.13	1.21	
Mansfield, OH MSA	0	0.00	98.69	0.00	0.00	0.00	0.00	0.00	0.00	
Parkersburg-Marietta-Vienna, WV-OH MSA	2	1.68	98.63	100.00	100.00	0.00	0.00	0.00	0.00	
Springfield, OH MSA	0	0.00	50.00	0.00	0.00	0.00	0.00	0.00	0.00	
Springfield, OH-WV MSA	0	0.00	95.45	0.00	0.00	0.00	0.00	0.00	0.00	
Youngstown-Warren-Boardman, OH-PA MSA	2	1.68	97.47	100.00	0.00	100.00	0.00	0.00	0.00	
Non-Metro OH	55	46.22	98.79	80.00	47.27	40.00	12.73	1.86	1.84	
<b>State Total</b>	<b>119</b>	<b>100.00</b>	<b>97.55</b>	<b>74.79</b>	<b>58.82</b>	<b>28.57</b>	<b>12.61</b>	<b>1.17</b>	<b>1.00</b>	

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 5.88% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Ohio				January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**		
	#	\$(000's)	#	\$(000's)	Evaluation Period	\$(000's)	% of Total	#	\$(000's)	
<b>Full Review:</b>										
Columbus, OH MSA	21	10,177	179	44,069	200	54,246	38.86%	3	390	
<b>Limited Review:</b>										
Akron, OH MSA	5	701	27	6,593	32	7,294	5.22%	0	0	
	2	2,968	24	2,373	26	5,341	3.83%	0	0	
Canton-Massillon, OH MSA	48	11,797	116	21,660	164	33,457	23.97%	0	0	
Cleveland-Elyria-Mentor, OH MSA	13	5,640	46	7,311	59	12,951	9.28%	0	0	
Dayton, OH MSA	0	0	6	57	6	57	0.04%	0	0	
Lima, OH MSA	1	150	2	262	3	412	0.30%	0	0	
Mansfield, OH MSA	0	0	4	6,192	4	6,192	4.44%	0	0	
Parkersburg-Marietta, WV-OH MSA	0	0	3	3,737	3	3,737	2.68%	0	0	
Springfield, OH MSA	4	1,438	0	0	4	1,438	1.03%	0	0	
Steubenville-Weirton, OH-WV MSA	22	2,433	27	4,032	49	6,465	4.63%	0	0	
Youngstown-Warren-Boardman, OH-PA MSA	6	1,784	17	6,225	23	8,009	5.74%	0	0	
Non-Metro - Ohio	122	37,088	451	102,511	573	139,599	100.00%	3	390	
State Total										
Statewide Investments with Potential to Benefit one or more AAs	35	6,900	32	35,394	67	42,294	N/A	0	0	
Statewide Investments with no Potential to Benefit one or more AAs	0	0	3	29	3	29	N/A	0	0	

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Ohio																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Columbus, OH MSA	49.36	77	29.62	9.09	18.18	29.87	42.86	13	3	1	-2	2	9	6.62	22.81	41.77	28.56
<b>Limited Review:</b>																	
Akron, OH MSA	7.93	21	8.08	14.29	9.52	47.62	28.57	0	0	0	0	0	0	6.29	21.45	48.11	24.15
Canton-Massillon, OH MSA	3.55	13	5.00	7.69	23.08	53.85	15.38	0	0	0	0	0	0	1.98	17.11	61.34	19.57
Cleveland-Elyria-Mentor, OH MSA	12.58	42	16.15	4.76	11.90	47.62	35.71	0	0	0	0	0	0	10.19	17.54	41.95	30.29
Dayton, OH MSA	10.04	33	12.69	12.12	12.12	51.52	24.24	1	0	0	0	1	0	3.32	21.76	49.08	25.85
Lima, OH MSA	2.44	7	2.69	14.29	14.29	57.14	14.29	0	0	0	0	0	0	2.94	24.02	53.54	19.50
Mansfield, OH MSA	0.89	4	1.54	0.00	25.00	50.00	25.00	0	0	0	0	0	0	2.08	17.95	56.06	23.91
Parkersburg-Marietta-Vienna, WV-OH MSA	0.84	5	1.92	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	9.95	81.06	8.98
Springfield, OH MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Steubenville-Weirton, OH-WV MSA	0.56	3	1.15	0.00	66.67	33.33	0.00	0	0	0	0	0	0	3.41	18.38	71.97	6.25
Youngstown-Warren-Boardman, OH-PA MSA	4.14	17	6.54	5.88	23.53	35.29	35.29	0	0	0	0	0	0	4.83	16.64	55.98	22.54
Non-Metro OH	7.67	38	14.62	0.00	13.16	65.79	21.05	0	1	0	0	-1	0	0.31	9.66	72.49	17.54
<b>State Total</b>	<b>100.00</b>	<b>260</b>	<b>100.00</b>	<b>7.31</b>	<b>16.92</b>	<b>45.00</b>	<b>30.77</b>	<b>14</b>	<b>4</b>	<b>1</b>	<b>-2</b>	<b>2</b>	<b>9</b>	<b>5.86</b>	<b>18.53</b>	<b>49.99</b>	<b>25.56</b>

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Oklahoma						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Oklahoma City, OK MSA	66.97	9,322	1,363,072	1,364	112,205	3	54	1	6,265	10,690	1,481,596	78.03
<b>Limited Review:</b>												
Tulsa, OK MSA	33.03	4,879	716,732	391	40,662	1	34	2	32,390	5,273	789,818	21.97
<b>State Total</b>	100.00	14,201	2,079,804	1,755	152,867	4	88	3	38,655	15,963	2,271,414	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	4,427	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	3	9,212	0	0	N/A

\* Deposit data as of June 30, 2010.

**Table 1. Other Products**

Lending Volume		Oklahoma										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Oklahoma City, OK MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	78.03	
<b>Limited Review:</b>															
Tulsa, OK MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	21.97	
<b>State Total</b>	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Oklahoma						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City, OK MSA	4,814	64.98	2.11	0.89	21.57	11.30	36.88	35.65	39.44	52.16	3.14	4.43	2.92	3.16	3.16
<b>Limited Review:</b>															
Tulsa, OK MSA	2,595	35.02	1.49	0.46	19.28	8.75	39.59	43.78	39.63	47.01	4.83	1.59	4.93	6.17	3.85
State Total	7,409	100.00	1.87	0.74	20.68	10.41	37.93	38.49	39.51	50.36	3.75	3.62	3.50	4.28	3.41

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Oklahoma								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City, OK MSA	237	76.95	2.11	0.84	21.57	22.36	36.88	35.02	39.44	41.77	0.67	0.00	1.00	0.62	0.60
<b>Limited Review:</b>															
Tulsa, OK MSA	71	23.05	1.49	0.00	19.28	8.45	39.59	36.62	39.63	54.93	0.19	0.00	0.00	0.16	0.25
State Total	308	100.00	1.87	0.65	20.68	19.16	37.93	35.39	39.51	44.81	0.51	0.00	0.76	0.47	0.47

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Oklahoma								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City, OK MSA	4,266	65.87	2.11	0.89	21.57	10.92	36.88	31.79	39.44	56.40	3.68	3.45	2.78	3.29	4.02
<b>Limited Review:</b>															
Tulsa, OK MSA	2,210	34.13	1.49	1.00	19.28	8.01	39.59	32.22	39.63	58.78	3.61	6.78	2.22	3.40	3.82
State Total	6,476	100.00	1.87	0.93	20.68	9.93	37.93	31.93	39.51	57.21	3.65	4.57	2.62	3.33	3.94

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Oklahoma								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City, OK MSA	4	57.14	4.67	0.00	37.31	25.00	35.20	25.00	22.82	50.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Tulsa, OK MSA	3	42.86	3.71	0.00	25.03	33.33	39.55	33.33	31.71	33.33	0.00	0.00	0.00	0.00	0.00
State Total	7	100.00	4.26	0.00	32.09	28.57	37.05	28.57	26.60	42.86	0.00	0.00	0.00	0.00	0.00

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

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

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Oklahoma								Evaluation Period: January 1, 2007 to December 31, 2010					
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
<b>Full Review:</b>															
Oklahoma City, OK MSA	1,331	77.29	4.43	7.06	21.77	23.44	34.74	27.87	36.59	41.62	0.66	1.02	0.70	0.64	0.62
<b>Limited Review:</b>															
Tulsa, OK MSA	391	22.71	1.39	0.77	21.76	25.58	35.59	30.95	41.26	42.71	0.38	0.00	0.32	0.32	0.45
State Total	1,722	100.00	3.28	5.63	21.77	23.93	35.06	28.57	38.36	41.87	0.55	0.87	0.55	0.52	0.55

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Oklahoma								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Oklahoma City, OK MSA	3	75.00	1.44	0.00	13.44	0.00	33.86	0.00	50.19	100.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Tulsa, OK MSA	1	25.00	1.20	0.00	16.64	0.00	41.01	0.00	41.15	100.00	2.78	0.00	0.00	0.00	4.55
<b>State Total</b>	<b>4</b>	<b>100.00</b>	<b>1.35</b>	<b>0.00</b>	<b>14.60</b>	<b>0.00</b>	<b>36.46</b>	<b>0.00</b>	<b>46.91</b>	<b>100.00</b>	<b>0.65</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>1.12</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

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

Borrower Distribution: HOME PURCHASE		Geography: Oklahoma										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Oklahoma City, OK MSA	4,815	64.98	19.74	6.74	17.58	22.32	21.28	27.55	41.40	43.38	3.40	3.04	3.65	3.53	3.22	
<b>Limited Review:</b>																
Tulsa, OK MSA	2,595	35.02	18.98	8.87	17.50	25.65	20.90	27.09	42.62	38.39	3.76	5.04	4.20	3.58	3.21	
State Total	7,410	100.00	19.44	7.46	17.55	23.45	21.14	27.40	41.87	41.70	3.53	3.65	3.85	3.55	3.22	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.2% of loans originated and purchased by bank.

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

Borrower Distribution: HOME IMPROVEMENT			Geography: Oklahoma								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Oklahoma City, OK MSA	237	76.95	19.74	9.13	17.58	17.81	21.28	32.88	41.40	40.18	0.70	0.00	0.57	1.11	0.72
<b>Limited Review:</b>															
Tulsa, OK MSA	71	23.05	18.98	10.94	17.50	15.63	20.90	23.44	42.62	50.00	0.20	0.00	0.00	0.81	0.00
State Total	308	100.00	19.44	9.54	17.55	17.31	21.14	30.74	41.87	42.40	0.54	0.00	0.40	1.02	0.46

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

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

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

\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.1% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Oklahoma										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Oklahoma City, OK MSA	4,266	65.87	19.74	5.35	17.58	17.16	21.28	24.91	41.40	52.58	4.04	3.67	4.05	4.17	4.01	
<b>Limited Review:</b>																
Tulsa, OK MSA	2,210	34.13	18.98	4.78	17.50	16.74	20.90	23.27	42.62	55.21	3.79	2.56	3.77	3.47	4.03	
State Total	6,476	100.00	19.44	5.15	17.55	17.02	21.14	24.35	41.87	53.48	3.94	3.30	3.95	3.92	4.02	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.2% of loans originated and purchased by bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Oklahoma			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Oklahoma City, OK MSA	1,364	77.72	76.78	49.78	89.66	5.06	5.28	0.66	0.98
<b>Limited Review:</b>									
Tulsa, OK MSA	391	22.28	74.43	31.46	82.61	7.93	9.46	0.38	0.20
State Total	1,755	100.00	75.88	45.70	88.09	5.70	6.21	0.55	0.67

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 37.72% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Oklahoma			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Oklahoma City, OK MSA	3	75.00	94.38	100.00	100.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Tulsa, OK MSA	1	25.00	93.08	0.00	100.00	0.00	0.00	2.78	0.00
State Total	4	100.00	93.91	75.00	100.00	0.00	0.00	0.65	0.00

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 25.00% of small loans to farms originated and purchased by the bank.



**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Oklahoma				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Oklahoma City, OK MSA	13	5,632	52	9,980	65	15,612	79.13%	0	0
<b>Limited Review:</b>									
Tulsa, OK MSA	7	3,657	47	460	54	4,117	20.87%	1	93
	20	9,289	99	10,440	119	19,729	100.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	18	3,051	13	7,657	31	10,708	N/A	2	54
Statewide Investments with no Potential to Benefit one or more AAs	2	747	2	10	4	757	N/A	2	197

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Oklahoma																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Oklahoma City, OK MSA	78.03	21	67.74	0.00	19.05	33.33	38.10	0	0	0	0	0	0	4.19	28.00	35.22	32.50
<b>Limited Review:</b>																	
Tulsa, OK MSA	21.97	10	32.26	0.00	40.00	20.00	40.00	0	1	0	0	0	-1	2.72	24.16	38.71	34.41
State Total	100.00	31	100.00	0.00	25.81	29.03	38.71	0	1	0	0	0	-1	3.62	26.51	36.57	33.24

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Oregon						Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Salem, OR MSA	23.87	3,023	616,512	216	9,072	0	0	16	10,471	3,255	636,055	24.41
<b>Limited Review:</b>												
Bend, OR MSA	18.07	2,303	556,556	157	8,447	0	0	4	4,312	2,464	569,315	10.73
Corvallis, OR MSA	4.23	544	105,556	29	1,690	2	65	2	2,229	577	109,540	4.86
Eugene-Springfield, OR MSA	14.21	1,804	373,124	124	7,579	1	30	9	9,789	1,938	390,522	15.44
Medford, OR MSA	13.18	1,516	317,503	277	11,427	0	0	4	5,079	1,797	334,009	20.71
Non-Metro OR	26.45	3,397	606,574	205	9,283	2	49	4	4,926	3,608	620,832	23.85
<b>State Total</b>	100.00	12,587	2,575,825	1,008	47,498	5	144	39	36,806	13,639	2,660,273	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	9,000	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	1	4,062	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Oregon										Evaluation Period: September 26, 2008 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Salem, OR MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	24.41	
<b>Limited Review:</b>															
Bend, OR MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	10.73	
Corvallis, OR MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.86	
Eugene-Springfield, OR MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	15.44	
Medford, OR MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20.71	
Non-Metro OR	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	23.85	
<b>State Total</b>	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Oregon						Evaluation Period: September 26, 2008 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	792	20.20	0.09	0.00	14.36	10.61	59.70	66.67	25.85	22.73	4.59	0.00	2.69	6.14	2.90
<b>Limited Review:</b>															
Bend, OR MSA	898	22.90	0.00	0.00	18.64	18.93	48.92	47.66	32.44	33.41	6.56	0.00	7.69	6.90	5.52
Corvallis, OR MSA	121	3.09	0.00	0.00	26.55	26.45	28.42	23.14	45.02	50.41	4.33	0.00	4.53	3.29	4.64
Eugene-Springfield, OR MSA	425	10.84	0.53	0.24	10.64	6.12	65.10	70.82	23.73	22.82	2.61	0.00	1.62	3.03	2.04
Medford, OR MSA	420	10.71	0.31	0.00	15.60	17.62	56.76	62.86	27.33	19.52	3.29	0.00	3.70	3.97	1.39
Non-Metro OR	1,265	32.26	0.00	0.00	11.99	7.75	70.71	76.60	17.30	15.65	7.37	0.00	6.46	8.05	5.39
State Total	3,921	100.00	0.16	0.03	13.78	12.34	62.15	64.22	23.91	23.41	5.05	0.00	4.51	5.84	3.69

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Oregon								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	68	23.86	0.09	0.00	14.36	13.24	59.70	55.88	25.85	30.88	3.61	0.00	2.38	3.77	3.73
<b>Limited Review:</b>															
Bend, OR MSA	35	12.28	0.00	0.00	18.64	14.29	48.92	28.57	32.44	57.14	5.48	0.00	0.00	7.55	6.25
Corvallis, OR MSA	14	4.91	0.00	0.00	26.55	21.43	28.42	14.29	45.02	64.29	1.15	0.00	0.00	0.00	2.50
Eugene-Springfield, OR MSA	42	14.74	0.53	0.00	10.64	4.76	65.10	71.43	23.73	23.81	3.39	0.00	2.70	3.64	3.17
Medford, OR MSA	41	14.39	0.31	0.00	15.60	21.95	56.76	51.22	27.33	26.83	5.08	0.00	16.67	2.02	6.67
Non-Metro OR	85	29.82	0.00	0.00	11.99	7.06	70.71	68.24	17.30	24.71	2.47	0.00	2.17	1.74	5.88
State Total	285	100.00	0.16	0.00	13.78	11.93	62.15	55.79	23.91	32.28	3.35	0.00	3.21	2.79	4.56

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Oregon								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	2,061	25.20	0.09	0.10	14.36	9.27	59.70	55.26	25.85	35.37	5.69	0.00	5.26	5.66	5.88
<b>Limited Review:</b>															
Bend, OR MSA	1,360	16.63	0.00	0.00	18.64	11.91	48.92	39.63	32.44	48.46	7.88	0.00	6.02	7.78	8.53
Corvallis, OR MSA	400	4.89	0.00	0.00	26.55	22.25	28.42	26.00	45.02	51.75	4.27	0.00	3.73	3.92	4.65
Eugene-Springfield, OR MSA	1,296	15.85	0.53	0.31	10.64	7.48	65.10	62.04	23.73	30.17	3.53	2.70	3.26	3.33	4.03
Medford, OR MSA	1,046	12.79	0.31	0.19	15.60	13.10	56.76	53.63	27.33	33.08	6.17	16.67	6.44	5.74	6.70
Non-Metro OR	2,015	24.64	0.00	0.00	11.99	8.14	70.71	66.30	17.30	25.56	4.69	0.00	4.81	4.40	5.57
State Total	8,178	100.00	0.16	0.10	13.78	10.27	62.15	54.82	23.91	34.81	5.17	3.92	4.89	4.84	5.87

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all refinance loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Oregon								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	102	50.25	0.46	0.00	40.27	38.24	41.61	45.10	17.66	16.67	2.86	0.00	5.88	0.00	0.00
<b>Limited Review:</b>															
Bend, OR MSA	10	4.93	0.00	0.00	27.32	30.00	57.45	70.00	15.23	0.00	0.00	0.00	0.00	0.00	0.00
Corvallis, OR MSA	9	4.43	0.00	0.00	69.50	100.00	11.08	0.00	19.41	0.00	0.00	0.00	0.00	0.00	0.00
Eugene-Springfield, OR MSA	41	20.20	14.02	17.07	28.02	26.83	42.14	51.22	15.82	4.88	2.27	0.00	0.00	6.67	0.00
Medford, OR MSA	9	4.43	4.18	0.00	38.22	66.67	32.71	22.22	24.89	11.11	0.00	0.00	0.00	0.00	0.00
Non-Metro OR	32	15.76	0.00	0.00	17.21	15.63	67.94	62.50	14.84	21.88	3.70	0.00	0.00	5.00	0.00
State Total	203	100.00	4.45	3.45	33.47	35.96	44.83	47.29	17.25	13.30	2.27	0.00	2.27	3.57	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\* Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by the number of multi-family housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Oregon						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Salem, OR MSA	216	21.43	0.27	0.00	22.09	17.13	57.30	62.50	20.34	20.37	0.13	0.00	0.17	0.12	0.14
<b>Limited Review:</b>															
Bend, OR MSA	157	15.58	0.00	0.00	22.64	19.75	43.52	49.68	33.84	30.57	0.21	0.00	0.33	0.20	0.16
Corvallis, OR MSA	29	2.88	0.00	0.00	43.44	37.93	23.64	27.59	32.91	34.48	0.44	0.00	0.79	0.28	0.20
Eugene-Springfield, OR MSA	124	12.30	4.42	7.26	16.88	20.16	57.25	49.19	21.46	23.39	0.05	0.37	0.00	0.06	0.00
Medford, OR MSA	277	27.48	5.15	2.17	22.91	21.66	49.54	57.04	22.40	19.13	0.23	0.00	0.17	0.32	0.15
Non-Metro OR	205	20.34	0.00	0.00	15.05	20.00	67.45	54.15	17.50	25.85	0.22	0.00	0.34	0.21	0.18
State Total	1,008	100.00	1.60	1.49	20.06	20.34	56.10	54.66	22.24	23.51	0.18	0.20	0.25	0.18	0.13

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Oregon						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Salem, OR MSA	0	0.00	0.10	0.00	7.82	0.00	73.51	0.00	18.56	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bend, OR MSA	0	0.00	0.00	0.00	13.54	0.00	50.00	0.00	36.46	0.00	0.00	0.00	0.00	0.00	0.00
Corvallis, OR MSA	2	40.00	0.00	0.00	22.87	0.00	55.72	50.00	21.41	50.00	0.00	0.00	0.00	0.00	0.00
Eugene-Springfield, OR MSA	1	20.00	0.90	0.00	7.61	0.00	71.36	100.00	20.13	0.00	1.37	0.00	0.00	1.75	0.00
Medford, OR MSA	0	0.00	1.60	0.00	16.47	0.00	59.36	0.00	22.57	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro OR	2	40.00	0.00	0.00	11.66	50.00	69.00	50.00	19.33	0.00	0.47	0.00	2.08	0.32	0.00
State Total	5	100.00	0.32	0.00	11.44	20.00	67.15	60.00	21.09	20.00	0.31	0.00	1.32	0.29	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: Oregon								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	792	20.20	18.49	6.84	18.97	28.77	23.62	36.08	38.92	28.30	3.66	5.88	3.01	4.20	3.30
<b>Limited Review:</b>															
Bend, OR MSA	898	22.90	17.37	10.93	20.54	19.28	22.66	21.47	39.43	48.31	5.07	4.73	3.96	4.20	6.24
Corvallis, OR MSA	121	3.09	19.62	5.43	18.42	27.17	22.30	34.78	39.65	32.61	4.42	3.57	4.63	3.10	5.32
Eugene-Springfield, OR MSA	425	10.84	19.02	4.23	18.57	23.08	22.91	35.00	39.49	37.69	2.01	1.18	1.70	1.77	2.46
Medford, OR MSA	420	10.71	19.34	4.12	18.89	23.53	21.45	30.59	40.32	41.76	2.04	0.61	1.99	1.81	2.47
Non-Metro OR	1,265	32.26	19.84	5.21	18.86	25.68	22.64	37.59	38.66	31.51	4.66	2.29	4.23	5.10	4.75
State Total	3,921	100.00	19.13	6.61	18.94	24.43	22.75	32.77	39.18	36.19	3.64	3.35	3.09	3.57	4.04

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all Home Purchase loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 42.5% of loans originated and purchased by bank

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: Oregon								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	68	23.86	18.49	10.34	18.97	10.34	23.62	20.69	38.92	58.62	3.85	9.52	3.51	2.13	4.17
<b>Limited Review:</b>															
Bend, OR MSA	35	12.28	17.37	23.08	20.54	30.77	22.66	30.77	39.43	15.38	5.84	20.00	5.26	8.11	1.52
Corvallis, OR MSA	14	4.91	19.62	0.00	18.42	0.00	22.30	20.00	39.65	80.00	1.19	0.00	0.00	3.03	0.00
Eugene-Springfield, OR MSA	42	14.74	19.02	5.00	18.57	20.00	22.91	25.00	39.49	50.00	3.56	0.00	2.90	3.19	4.42
Medford, OR MSA	41	14.39	19.34	6.25	18.89	6.25	21.45	43.75	40.32	43.75	5.56	10.00	2.70	6.00	6.15
Non-Metro OR	85	29.82	19.84	8.00	18.86	4.00	22.64	32.00	38.66	56.00	2.64	5.26	1.08	2.56	2.84
State Total	285	100.00	19.13	9.26	18.94	12.04	22.75	28.70	39.18	50.00	3.57	7.34	2.42	3.45	3.54

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all Home Improvement loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 62.1% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Oregon								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salem, OR MSA	2,061	25.20	18.49	4.89	18.97	17.91	23.62	25.43	38.92	51.77	6.52	7.73	6.99	5.99	6.57
<b>Limited Review:</b>															
Bend, OR MSA	1,360	16.63	17.37	4.23	20.54	16.47	22.66	23.84	39.43	55.47	9.01	8.44	10.24	9.47	8.51
Corvallis, OR MSA	400	4.89	19.62	9.36	18.42	19.10	22.30	34.83	39.65	36.70	4.73	6.25	4.94	6.33	3.59
Eugene-Springfield, OR MSA	1,296	15.85	19.02	3.95	18.57	16.49	22.91	29.50	39.49	50.06	4.07	2.82	4.45	4.47	3.82
Medford, OR MSA	1,046	12.79	19.34	4.84	18.89	15.58	21.45	27.23	40.32	52.34	7.08	9.19	8.77	7.65	6.11
Non-Metro OR	2,015	24.64	19.84	4.17	18.86	13.69	22.64	25.99	38.66	56.15	5.40	4.34	5.79	5.30	5.42
State Total	8,178	100.00	19.13	4.66	18.94	16.15	22.75	26.63	39.18	52.56	5.94	5.91	6.55	6.06	5.70

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 33.9% of loans originated and purchased by bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Oregon			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Salem, OR MSA	216	21.43	78.47	79.17	96.76	2.78	0.46	0.13	0.24
<b>Limited Review:</b>									
Bend, OR MSA	157	15.58	82.34	82.80	96.18	1.27	2.55	0.21	0.28
Corvallis, OR MSA	29	2.88	77.33	44.83	93.10	3.45	3.45	0.44	0.19
Eugene-Springfield, OR MSA	124	12.30	80.15	84.68	95.97	0.00	4.03	0.05	0.05
Medford, OR MSA	277	27.48	81.86	79.42	97.11	2.53	0.36	0.23	0.28
Non-Metro OR	205	20.34	79.89	72.20	97.56	0.98	1.46	0.22	0.09
State Total	1,008	100.00	80.13	78.08	96.73	1.79	1.49	0.18	0.17

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 8.43% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Oregon			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Salem, OR MSA	0	0.00	92.70	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Bend, OR MSA	0	0.00	97.98	0.00	0.00	0.00	0.00	0.00	0.00
Corvallis, OR MSA	2	40.00	95.62	0.00	100.00	0.00	0.00	0.00	0.00
Eugene-Springfield, OR MSA	1	20.00	96.81	0.00	100.00	0.00	0.00	1.37	0.00
Medford, OR MSA	0	0.00	97.33	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro OR	2	40.00	96.49	0.00	100.00	0.00	0.00	0.47	0.00
State Total	5	100.00	95.87	0.00	100.00	0.00	0.00	0.31	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 100.00% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Oregon				September 26, 2008 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Salem, OR MSA	2	195	4	2,860	6	3,055	11.96%	0	0
<b>Limited Review:</b>									
Bend, OR MSA	1	958	3	4,015	4	4,973	19.47%	0	0
Corvallis, OR MSA	0	0	2	1,158	2	1,158	4.53%	0	0
Eugene-Springfield, OR MSA	11	7,304	11	2,918	22	10,222	40.02%	1	3
Medford, OR MSA	2	261	7	4,778	9	5,039	19.73%	0	0
Non-Metro - Oregon	6	626	7	468	13	1,094	4.28%	0	0
<b>State Total</b>	22	9,344	34	16,197	56	25,541	100.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	3	651	20	6,613	23	7,264	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	0	0	0	0	N/A	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.



**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Oregon																	
Evaluation Period: September 26, 2008 to December 31, 2010																	
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
<b>Full Review:</b>																	
Salem, OR MSA	24.41	12	22.64	0.00	25.00	58.33	16.67	0	0	0	0	0	0	0.98	21.38	56.75	20.89
<b>Limited Review:</b>																	
Bend, OR MSA	10.73	5	9.43	0.00	40.00	60.00	0.00	0	0	0	0	0	0	0.00	21.19	49.23	29.58
Corvallis, OR MSA	4.86	2	3.77	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	43.47	23.14	33.39
Eugene-Springfield, OR MSA	15.44	9	16.98	0.00	22.22	66.67	11.11	0	0	0	0	0	0	2.90	14.69	61.85	20.56
Medford, OR MSA	20.71	11	20.75	9.09	18.18	63.64	9.09	0	0	0	0	0	0	1.16	22.53	52.66	23.65
Non-Metro OR	23.85	14	26.42	0.00	35.71	50.00	14.29	0	0	0	0	0	0	0.00	13.05	70.55	16.40
State Total	100.00	53	100.00	1.89	28.30	56.60	13.21	0	0	0	0	0	0	0.95	18.45	59.70	20.91

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 53 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

Table 1. Lending Volume

Lending Volume		Texas						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Houston-Sugar Land-Baytown, TX MSA	32.49%	82,565	13,478,854	10,532	1,009,324	11	510	58	351,924	93,166	14,840,612	51.20
<b>Limited Review:</b>												
Abilene, TX MSA	0.65	1,818	238,755	40	3,938	1	25	1	900	1,860	243,618	0.15
Austin-Round Rock-San Marcos, TX MSA	0.39	1,062	123,134	67	11,150	1	84	2	6,700	1,132	141,068	0.26
Beaumont-Port Arthur, TX MSA	11.02	29,220	5,550,803	2,361	226,348	3	517	13	43,953	31,597	5,821,621	4.12
Brownsville-Harlingen, TX MSA	0.72	1,886	228,789	178	26,905	0	0	12	31,350	2,076	287,044	0.55
Brownsville-Harlingen, TX MSA	0.36	846	84,784	188	26,159	0	0	3	3,271	1,037	114,214	0.39
College Station-Bryan, TX MSA	0.56	1,540	236,560	68	5,345	2	60	0	0	1,610	241,965	0.10
Dallas-Plano-Irving, TX MD	23.66	59,447	10,472,334	8,361	806,117	11	460	33	53,499	67,852	11,332,410	30.65
El Paso, TX MSA	2.21	5,628	723,012	717	95,174	0	0	2	3,053	6,347	821,239	1.25
Fort Worth-Arlington, TX MD	11.86	30,497	4,568,217	3,474	352,599	11	728	14	115,653	33,996	5,037,197	6.15
Killeen-Temple-Fort Hood, TX MSA	1.17	3,289	459,996	52	3,351	0	0	2	3,300	3,343	466,647	0.07
Laredo, TX MSA	0.60	1,485	196,697	222	7,723	1	23	2	2,300	1,710	206,743	0.04
Longview, TX MSA	0.51	1,295	159,207	157	23,852	0	0	0	0	1,452	183,059	0.25
McAllen-Edinburg-Mission, TX MSA	1.25	3,145	375,703	417	34,411	3	532	8	23,625	3,573	434,271	0.71
Midland, TX MSA	1.06	2,926	480,231	109	12,566	11	2,398	0	0	3,046	495,195	0.19
Odessa, TX MSA	0.42	1,061	126,318	131	22,483	1	24	0	0	1,193	148,825	0.30
San Antonio-New Braunfels, TX MSA	8.49	22,439	3,557,294	1,886	153,371	1	255	8	45,801	24,334	3,756,721	1.64
Sherman-Denison, TX MSA	0.44	1,192	138,012	66	4,966	8	1,645	0	0	1,266	144,623	0.26
Tyler, TX MSA	0.29	726	103,952	95	15,327	0	0	1	2,871	822	122,150	0.27
Waco, TX MSA	0.66	1,776	222,615	111	13,246	0	0	1	1,138	1,888	236,999	0.38
Wichita Falls, TX MSA	0.17	391	44,244	96	15,514	2	1,000	0	0	489	60,758	0.44
Non-Metro TX	1.03	2,683	385,661	273	29,663	9	822	1	3,790	2,966	419,936	0.64
<b>State Total</b>	<b>100.00</b>	<b>256,917</b>	<b>41,955,172</b>	<b>29,601</b>	<b>2,899,532</b>	<b>76</b>	<b>9,083</b>	<b>161</b>	<b>693,128</b>	<b>286,755</b>	<b>45,556,915</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	4	11,463	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	13	26,907	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Texas										Evaluation Period: January 1, 2007 to December 31, 2010		
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Houston-Sugar Land-Baytown, TX MSA	29.17	13	81,514	13	81,514	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	51.20
<b>Limited Review:</b>														
Abilene, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.15
Amarillo, TX MSA	5.50	1	15,372	1	15,372	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.26
Austin-Round Rock-San Marcos, TX MSA	10.33	10	28,878	10	28,878	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.12
Beaumont-Port Arthur, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.55
Brownsville-Harlingen, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.39
College Station-Bryan, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.10
Dallas-Plano-Irving, TX MD	25.10	4	70,135	4	70,135	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	30.65
El Paso, TX MSA	15.26	4	42,631	4	42,631	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.25
Fort Worth-Arlington, TX MD	9.94	3	27,781	3	27,781	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.15
Killeen-Temple-Fort Hood, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.07
Laredo, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.04
Longview, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.25
McAllen-Edinburg-Mission, TX MSA	2.57	3	7,180	3	7,180	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.71
Midland, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.19
Odessa, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.30
San Antonio-New Braunfels, TX MSA	0.89	3	2,496	3	2,496	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.64
Sherman-Denison, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.26
Tyler, TX MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.27
Waco, TX MSA	1.10	2	3,082	2	3,082	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.38
Wichita Falls, TX MSA	0.13	1	375	1	375	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.44
Non-Metro TX	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.64
	100.00	44	279,445	44	279,445	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	5	2,541	5	2,541	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Texas								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	46,071	32.05	2.87	2.21	23.19	12.64	32.97	29.48	40.97	55.67	6.96	8.72	7.63	6.79	6.88
<b>Limited Review:</b>															
Abilene, TX MSA	1,189	0.83	0.00	0.00	16.18	3.53	47.42	36.67	36.39	59.80	10.57	0.00	5.03	9.26	12.28
Amadori, TX MSA	701	0.49	1.45	0.57	27.92	24.68	35.09	43.79	35.53	30.96	2.77	0.00	2.11	2.80	2.97
Austin-Round Rock-San Marcos, TX MSA	16,456	11.45	2.79	2.32	18.90	13.85	42.63	52.19	35.68	31.65	7.79	5.96	8.40	9.31	5.57
Beaumont-Port Arthur, TX MSA	1,141	0.79	3.76	0.88	18.35	9.64	48.52	47.68	29.36	41.81	7.36	4.17	10.36	7.95	6.41
Brownsville-Harlingen, TX MSA	521	0.36	2.23	7.68	34.69	16.89	28.14	24.95	34.94	50.48	7.97	4.67	10.71	7.49	8.20
College Station-Bryan, TX MSA	1,014	0.71	0.08	0.00	21.69	12.43	37.81	33.14	40.41	54.44	6.29	0.00	3.21	6.84	6.74
Dallas-Plano-Irving, TX MD	30,725	21.38	2.57	1.08	20.21	9.39	36.31	38.15	40.91	51.38	5.29	4.91	4.16	5.99	5.00
El Paso, TX MSA	3,209	2.23	0.92	0.28	26.70	15.96	34.90	49.05	37.48	34.71	8.49	0.00	12.76	9.39	6.32
El Paso-El Paso, TX MSA	17,253	12.00	3.14	0.46	18.57	8.39	43.89	46.59	34.39	44.55	6.96	4.71	6.54	7.19	6.85
Killeen-Temple-Fort Hood, TX MSA	2,159	1.50	0.22	0.00	9.84	2.32	50.25	45.25	39.69	52.43	5.44	0.00	4.53	5.11	5.85
Laredo, TX MSA	1,063	0.74	0.12	0.00	34.45	17.97	33.06	23.05	32.37	58.98	6.49	0.00	7.94	4.30	6.90
Longview, TX MSA	868	0.60	0.00	0.00	22.65	14.40	44.16	47.58	33.19	38.02	4.67	0.00	2.61	4.83	5.45
MSA Allen-Edinburg-Mission, TX	1,838	1.28	0.00	0.00	27.56	14.91	48.45	40.81	23.99	44.29	7.38	0.00	9.57	6.64	7.51
Midland, TX MSA	1,908	1.33	4.50	1.26	18.42	7.60	44.68	41.61	32.40	49.53	16.22	8.93	13.75	15.50	17.58
Odessa, TX MSA	615	0.43	2.25	0.98	15.94	5.85	43.46	28.29	38.35	64.88	7.63	3.23	6.42	7.16	8.10
San Antonio-New Braunfels, TX MSA	13,369	9.30	1.49	0.29	28.43	12.21	37.16	30.06	32.91	57.43	5.51	2.16	7.59	5.47	5.18
Sherman-Denison, TX MSA	610	0.42	0.00	0.00	13.89	11.80	75.65	75.57	10.46	12.62	3.54	0.00	1.85	3.81	3.46
Tyler, TX MSA	418	0.29	4.38	1.67	28.23	13.16	21.89	20.81	45.50	64.35	5.55	6.67	4.31	6.19	5.58
Waco, TX MSA	1,064	0.74	4.80	2.35	18.68	6.86	36.55	27.35	39.97	63.44	6.77	5.08	2.31	6.89	7.55
Wichita Falls, TX MSA	140	0.10	2.38	0.71	22.17	11.43	41.65	52.14	33.80	35.71	0.65	0.00	0.00	0.68	0.85
Non-Metro TX	1,401	0.97	0.00	0.00	4.54	1.50	51.38	45.32	44.07	53.18	9.49	0.00	6.58	10.22	9.03
State Total	143,733	100.00	2.36	1.38	21.93	11.26	38.32	37.69	37.39	49.68	6.54	6.55	6.81	6.97	6.18

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT		Geography: Texas										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***					
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Houston-Sugar Land-Baytown, TX MSA	2,695	37.54	2.87	2.71	23.19	21.19	32.97	30.46	40.97	45.64	3.18	2.60	3.86	3.24	2.93	
<b>Limited Review:</b>																
Abilene, TX MSA	47	0.65	0.00	0.00	16.18	10.64	47.42	46.81	36.39	42.55	1.51	0.00	3.70	1.69	0.83	
Amarillo, TX MSA	31	0.43	1.45	0.00	27.92	35.48	35.09	35.48	35.53	29.03	1.32	0.00	1.03	2.20	0.88	
Austin-Round Rock-San Marcos, TX MSA	517	7.20	2.79	3.09	18.90	13.15	42.63	44.29	35.68	39.46	2.29	0.00	2.01	2.03	2.79	
Beaumont-Port Arthur, TX MSA	93	1.30	3.76	3.23	18.35	22.58	48.52	46.24	29.36	27.96	0.57	0.00	1.82	0.40	0.46	
Brownsville-Harlingen, TX MSA	52	0.72	2.23	1.92	34.69	26.92	28.14	25.00	34.94	46.15	3.08	0.00	5.00	2.44	2.22	
College Station-Bryan, TX MSA	15	0.21	0.08	0.00	21.69	13.33	37.81	33.33	40.41	53.33	3.45	0.00	0.00	5.71	2.94	
Dallas-Plano-Irving, TX MD	1,528	21.28	2.57	1.90	20.21	21.40	36.31	31.74	40.91	44.96	3.23	2.78	4.09	2.52	3.52	
El Paso, TX MSA	217	3.02	0.92	0.00	26.70	20.28	34.90	26.73	37.48	53.00	0.46	0.00	0.00	0.63	0.53	
El Paso-El Paso, TX MSA	699	9.74	3.14	4.29	18.57	18.31	43.89	39.20	34.39	38.20	2.78	14.29	1.91	2.20	3.32	
Killeen-Temple-Fort Hood, TX MSA	61	0.85	0.22	0.00	9.84	6.56	50.25	31.15	39.69	62.30	0.95	0.00	0.00	0.74	1.25	
Laredo, TX MSA	23	0.32	0.12	0.00	34.45	30.43	33.06	17.39	32.37	52.17	0.00	0.00	0.00	0.00	0.00	
Longview, TX MSA	45	0.63	0.00	0.00	22.65	17.78	44.16	37.78	33.19	44.44	1.29	0.00	2.27	0.97	1.18	
McAllen-Edinburg-Mission, TX MSA	138	1.92	0.00	0.00	27.56	18.12	48.45	41.30	23.99	40.58	2.01	0.00	2.44	0.00	4.38	
Midland, TX MSA	72	1.00	4.50	5.56	18.42	5.56	44.68	51.39	32.40	37.50	2.64	0.00	2.38	3.81	1.35	
Odessa, TX MSA	72	1.00	2.25	0.00	15.94	18.06	43.46	30.56	38.35	51.39	6.54	0.00	5.88	6.25	6.94	
San Antonio-New Braunfels, TX MSA	556	7.74	1.49	1.44	28.43	25.36	37.16	31.47	32.91	41.73	1.24	0.00	1.39	0.56	1.72	
Sherman-Denison, TX MSA	75	1.04	0.00	0.00	13.89	16.00	75.65	70.67	10.46	13.33	4.14	0.00	5.88	3.45	8.33	
Tyler, TX MSA	21	0.29	4.38	0.00	28.23	28.57	21.89	28.57	45.50	42.86	1.22	0.00	0.00	0.00	2.33	
Waco, TX MSA	48	0.67	4.80	4.17	18.68	18.75	36.55	35.42	39.97	41.67	1.54	0.00	0.00	2.47	1.52	
Wichita Falls, TX MSA	42	0.59	2.38	4.76	22.17	35.71	41.65	33.33	33.80	26.19	0.85	0.00	0.00	1.92	0.00	
Non-Metro TX	132	1.84	0.00	0.00	4.54	8.33	51.38	47.73	44.07	43.94	0.97	0.00	0.00	0.83	1.32	
<b>State Total</b>	<b>7,179</b>	<b>100.00</b>	<b>2.36</b>	<b>2.34</b>	<b>21.93</b>	<b>20.14</b>	<b>38.32</b>	<b>34.06</b>	<b>37.39</b>	<b>43.46</b>	<b>2.24</b>	<b>2.65</b>	<b>2.26</b>	<b>1.91</b>	<b>2.49</b>	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

Table 4. Geographic Distribution of Refinance Loans

Geographic Distribution: REFINANCE		Geography: Texas								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	32,856	31.36	2.87	1.40	23.19	12.55	32.97	27.09	40.97	58.96	8.70	7.31	7.46	7.66	9.24
<b>Limited Review:</b>															
Abilene, TX MSA	581	0.55	0.00	0.00	16.18	2.41	47.42	25.99	36.39	71.60	12.06	0.00	3.80	9.07	14.07
Amesbury, TX MSA	329	0.31	1.45	0.61	27.92	11.25	35.09	38.60	35.53	49.54	2.01	0.00	1.47	2.67	1.69
Austin-Round Rock-San Marcos, TX MSA	12,197	11.64	2.79	1.57	18.90	9.56	42.63	38.61	35.68	50.27	7.83	7.84	6.24	7.41	8.40
Beaumont-Port Arthur, TX MSA	647	0.62	3.76	1.70	18.35	9.58	48.52	39.88	29.36	48.84	4.25	0.00	3.90	3.65	4.92
Brownsville-Harlingen, TX MSA	272	0.26	2.23	3.68	34.69	16.54	28.14	26.10	34.94	53.68	4.54	2.04	4.51	4.52	4.85
College Station-Bryan, TX MSA	507	0.48	0.08	0.39	21.69	7.30	37.81	32.35	40.41	59.96	7.41	0.00	4.47	7.96	7.50
Dallas-Plano-Irving, TX MD	27,069	25.83	2.57	0.91	20.21	9.70	36.31	28.82	40.91	60.57	6.99	5.21	5.66	6.31	7.39
El Paso, TX MSA	2,197	2.10	0.92	0.09	26.70	11.47	34.90	33.32	37.48	55.12	6.44	0.00	4.10	5.79	7.32
El Paso-El Paso, TX MSA	12,521	11.95	3.14	0.69	18.57	8.31	43.89	37.88	34.39	53.12	7.70	1.86	6.26	7.25	8.16
Killeen-Temple-Fort Hood, TX MSA	1,068	1.02	0.22	0.00	9.84	2.34	50.25	43.63	39.69	54.03	6.15	0.00	5.33	5.64	6.70
Laredo, TX MSA	399	0.38	0.12	0.00	34.45	12.78	33.06	22.81	32.37	64.41	5.70	0.00	7.63	2.69	6.43
Longview, TX MSA	381	0.36	0.00	0.00	22.65	12.34	44.16	43.31	33.19	44.36	5.16	0.00	2.06	6.13	4.92
MSA															
Allen-Edinburg-Mission, TX	1,159	1.11	0.00	0.00	27.56	13.29	48.45	42.45	23.99	44.26	5.83	0.00	5.90	5.28	6.31
Midland, TX MSA	946	0.90	4.50	0.63	18.42	4.86	44.68	41.75	32.40	52.75	16.35	0.00	8.74	15.38	17.83
Odessa, TX MSA	374	0.36	2.25	0.27	15.94	6.15	43.46	27.01	38.35	66.58	8.22	0.00	1.52	7.43	9.13
San Antonio-New Braunfels, TX MSA	8,468	8.08	1.49	0.34	28.43	12.02	37.16	28.57	32.91	59.07	5.86	3.90	3.82	5.10	6.46
Sherman-Denison, TX MSA	506	0.48	0.00	0.00	13.89	7.91	75.65	78.06	10.46	14.03	5.90	0.00	3.31	6.10	6.09
Tyler, TX MSA	287	0.27	4.38	2.79	28.23	14.29	21.89	23.34	45.50	59.58	4.80	0.00	3.64	6.04	4.71
Waco, TX MSA	661	0.63	4.80	1.06	18.68	6.51	36.55	30.26	39.97	62.18	6.52	0.00	2.97	5.87	7.37
Waco, TX MSA	208	0.20	2.38	0.00	22.17	13.94	41.65	49.52	33.80	36.54	1.64	0.00	3.13	2.13	0.92
Non-Metro TX	1,146	1.09	0.00	0.00	4.54	2.09	51.38	38.31	44.07	59.60	7.47	0.00	2.33	6.78	8.02
State Total	104,779	100.00	2.36	1.01	21.93	10.44	38.32	31.49	37.39	57.06	7.41	6.01	5.85	6.72	7.95

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all refinance loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

Table 5. Geographic Distribution of Multi-Family Loans

Geographic Distribution: MULTI-FAMILY		Geography: Texas								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	829	75.92	9.84	0.60	35.87	14.11	30.30	44.03	23.99	41.25	2.19	0.00	1.72	7.14	0.00
<b>Limited Review:</b>															
Abilene, TX MSA	1	0.09	0.00	0.00	10.73	100.00	75.59	0.00	13.67	0.00	0.00	0.00	0.00	0.00	0.00
Amarillo, TX MSA	1	0.09	2.42	0.00	31.81	100.00	32.45	0.00	33.32	0.00	0.00	0.00	0.00	0.00	0.00
Amarillo-Rock-San Marcos, TX MSA	50	4.58	18.86	6.00	30.99	22.00	35.24	52.00	14.91	20.00	1.75	0.00	5.56	0.00	0.00
Beaumont-Port Arthur, TX MSA	5	0.46	6.31	0.00	27.87	20.00	33.89	80.00	31.94	0.00	14.29	0.00	0.00	28.57	0.00
Brownsville-Harlingen, TX MSA	1	0.09	7.49	0.00	25.23	0.00	27.73	100.00	39.55	0.00	0.00	0.00	0.00	0.00	0.00
College Station-Bryan, TX MSA	3	0.27	7.38	0.00	31.28	0.00	52.11	66.67	9.23	33.33	0.00	0.00	0.00	0.00	0.00
Dallas-Plano-Irving, TX MD	108	9.89	14.32	19.44	30.42	18.52	33.46	27.78	21.80	34.26	0.00	0.00	0.00	0.00	0.00
Dallas-Ft. Worth, TX MSA	5	0.46	11.43	0.00	31.34	60.00	26.23	20.00	31.00	20.00	3.70	0.00	10.00	0.00	0.00
El Paso, TX MSA	24	2.20	7.03	8.33	28.60	50.00	45.61	16.67	18.76	25.00	0.00	0.00	0.00	0.00	0.00
El Paso-El Paso, TX MSA	1	0.09	3.74	0.00	36.40	100.00	43.02	0.00	16.84	0.00	0.00	0.00	0.00	0.00	0.00
Laredo, TX MSA	0	0.00	2.50	0.00	18.94	0.00	41.52	0.00	37.04	0.00	0.00	0.00	0.00	0.00	0.00
Longview, TX MSA	1	0.09	0.00	0.00	19.87	0.00	45.64	0.00	34.49	100.00	0.00	0.00	0.00	0.00	0.00
McAllen-Edinburg-Mission, TX MSA	10	0.92	0.00	0.00	11.56	40.00	31.77	30.00	56.67	30.00	5.00	0.00	33.33	0.00	0.00
Midland, TX MSA	0	0.00	2.26	0.00	4.69	0.00	42.21	0.00	50.85	0.00	0.00	0.00	0.00	0.00	0.00
Odessa, TX MSA	0	0.00	0.72	0.00	15.47	0.00	29.62	0.00	54.19	0.00	0.00	0.00	0.00	0.00	0.00
San Antonio-New Braunfels, TX MSA	44	4.03	1.81	0.00	35.34	22.73	40.82	29.55	22.03	47.73	0.00	0.00	0.00	0.00	0.00
Sherman-Denison, TX MSA	1	0.09	0.00	0.00	14.38	0.00	83.30	100.00	2.32	0.00	0.00	0.00	0.00	0.00	0.00
Tyler, TX MSA	0	0.00	0.57	0.00	30.67	0.00	30.62	0.00	38.14	0.00	0.00	0.00	0.00	0.00	0.00
Waco, TX MSA	3	0.27	26.63	66.67	38.25	0.00	18.33	33.33	16.78	0.00	0.00	0.00	0.00	0.00	0.00
Waco-Tyler, TX MSA	1	0.09	1.93	0.00	23.69	0.00	24.48	100.00	49.90	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro TX	4	0.37	0.00	0.00	8.66	0.00	53.03	25.00	38.31	75.00	0.00	0.00	0.00	0.00	0.00
State Total	1,092	100.00	10.48	3.02	31.88	16.58	34.66	41.48	22.98	38.92	1.44	0.00	2.15	2.13	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\* Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by the number of multi-family housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Texas						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	10,479	35.67	4.22	4.86	23.05	25.31	28.75	26.14	43.39	43.70	0.72	0.73	0.81	0.62	0.74
<b>Limited Review:</b>															
Abilene, TX MSA	40	0.14	0.00	0.00	22.36	20.00	45.26	52.50	31.69	27.50	0.35	0.00	0.32	0.42	0.26
Amarillo, TX MSA	67	0.23	10.70	17.91	28.86	32.84	30.39	19.40	30.05	29.85	0.18	0.00	0.27	0.16	0.19
Austin-Round Rock-San Marcos, TX MSA	2,360	8.03	4.03	2.80	17.50	16.86	39.70	40.55	38.68	39.79	0.63	0.44	0.74	0.71	0.54
Beaumont-Port Arthur, TX MSA	178	0.61	2.85	0.00	20.76	24.72	44.75	42.13	31.62	33.15	0.49	0.00	0.57	0.61	0.33
Brownsville-Harlingen, TX MSA	188	0.64	5.53	6.91	32.72	30.32	25.45	26.06	36.29	36.70	1.27	1.60	0.56	1.39	1.68
College Station-Bryan, TX MSA	68	0.23	1.43	1.47	24.32	10.29	35.30	39.71	38.57	48.53	0.31	0.00	0.10	0.43	0.33
Dallas-Plano-Irving, TX MD	8,195	27.89	3.78	3.73	21.08	24.04	33.55	30.25	40.58	41.98	0.67	0.72	0.87	0.66	0.58
El Paso-El Paso, TX MSA	717	2.44	7.27	9.34	28.88	32.91	26.73	23.85	37.12	33.89	0.90	0.38	0.91	1.17	0.83
El Paso-El Paso, TX MD	3,474	11.82	2.76	2.62	21.44	21.73	41.06	37.39	34.73	38.26	0.61	0.38	0.68	0.56	0.62
Killeen-Temple-Fort Hood, TX MSA	52	0.18	3.25	7.69	16.19	7.69	45.34	40.38	35.22	44.23	0.17	0.57	0.00	0.13	0.25
Laredo, TX MSA	222	0.76	4.76	4.05	19.86	21.17	22.07	14.86	53.31	59.91	0.67	0.43	0.67	0.72	0.67
Longview, TX MSA	157	0.53	0.00	0.00	30.80	35.03	40.63	45.86	28.57	19.11	0.48	0.00	0.45	0.51	0.46
McAllen-Edinburg-Mission, TX MSA	417	1.42	0.00	0.00	19.75	22.54	42.20	36.69	38.05	40.77	0.67	0.00	0.75	0.62	0.68
Midland, TX MSA	109	0.37	5.19	6.42	29.26	26.61	35.36	44.95	30.20	22.02	0.32	0.00	0.23	0.33	0.42
Odessa, TX MSA	131	0.45	1.42	0.76	18.57	23.66	39.09	41.22	40.92	34.35	0.90	0.00	1.00	0.86	0.92
San Antonio-New Braunfels, TX MSA	1,886	6.42	1.48	1.75	24.13	26.56	35.84	32.61	38.37	39.08	0.48	0.32	0.41	0.49	0.51
Sherman-Denison, TX MSA	66	0.22	0.00	0.00	18.19	21.21	73.06	65.15	8.76	13.64	0.33	0.00	0.80	0.20	0.43
Tyler, TX MSA	95	0.32	5.66	4.21	32.19	16.84	16.24	20.00	45.92	58.95	0.26	0.00	0.37	0.19	0.24
Waco, TX MSA	111	0.38	4.05	2.70	27.62	19.82	28.84	14.41	39.49	63.06	0.23	0.00	0.00	0.00	0.58
Waco, TX MSA	96	0.33	1.12	2.08	36.70	45.83	27.08	26.04	35.10	26.04	0.80	0.00	0.50	1.46	0.65
Non-Metro TX	273	0.93	0.00	0.00	4.99	4.03	46.36	32.60	48.65	63.37	0.49	0.00	0.39	0.22	0.72
<b>State Total</b>	<b>29,381</b>	<b>100.00</b>	<b>3.53</b>	<b>3.84</b>	<b>22.01</b>	<b>23.88</b>	<b>34.28</b>	<b>30.70</b>	<b>39.73</b>	<b>41.58</b>	<b>0.63</b>	<b>0.56</b>	<b>0.71</b>	<b>0.60</b>	<b>0.62</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data



Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Texas						Evaluation Period: January 1, 2007 to December 31, 2010						
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
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	11	14.47	2.69	0.00	19.20	0.00	39.64	18.18	38.29	81.82	0.28	0.00	0.00	0.00	0.87
<b>Limited Review:</b>															
Abilene, TX MSA	1	1.32	0.00	0.00	6.87	0.00	44.23	0.00	48.90	100.00	0.00	0.00	0.00	0.00	0.00
Amarillo-Rowles, TX MSA	1	1.32	10.42	0.00	12.42	0.00	36.59	0.00	40.58	100.00	0.00	0.00	0.00	0.00	0.00
Armadillo-Rock-San Marcos, TX MSA	3	3.95	2.02	0.00	18.13	0.00	48.06	33.33	31.79	66.67	0.27	0.00	0.00	0.00	1.22
Beaumont-Port Arthur, TX MSA	0	0.00	2.03	0.00	11.36	0.00	57.46	0.00	29.15	0.00	0.00	0.00	0.00	0.00	0.00
Brownsville-Harlingen, TX MSA	0	0.00	2.83	0.00	17.92	0.00	34.91	0.00	44.34	0.00	0.00	0.00	0.00	0.00	0.00
College Station-Bryan, TX MSA	2	2.63	0.41	0.00	12.03	0.00	36.51	50.00	51.04	50.00	0.00	0.00	0.00	0.00	0.00
Dallas-Plano-Irving, TX MD	11	14.47	1.91	0.00	17.10	0.00	45.13	45.45	35.52	54.55	0.46	0.00	0.00	0.47	0.88
El Paso-El Paso, TX MSA	0	0.00	3.04	0.00	35.14	0.00	24.51	0.00	37.31	0.00	0.00	0.00	0.00	0.00	0.00
El Paso-El Paso, TX MD	11	14.47	1.29	0.00	13.76	9.09	54.59	54.55	30.35	36.36	0.90	0.00	0.00	1.57	0.00
Killeen-Temple-Fort Hood, TX MSA	0	0.00	0.58	0.00	7.79	0.00	41.70	0.00	49.93	0.00	0.00	0.00	0.00	0.00	0.00
Laredo, TX MSA	1	1.32	1.14	0.00	15.34	100.00	28.98	0.00	54.55	0.00	0.00	0.00	0.00	0.00	0.00
Longview, TX MSA	0	0.00	0.00	0.00	15.25	0.00	49.83	0.00	34.92	0.00	0.00	0.00	0.00	0.00	0.00
McAllen-Edinburg-Mission, TX MSA	3	3.95	0.00	0.00	15.96	33.33	49.70	0.00	34.34	66.67	0.00	0.00	0.00	0.00	0.00
Midland, TX MSA	11	14.47	1.97	0.00	20.72	0.00	51.97	100.00	25.33	0.00	10.71	0.00	0.00	17.65	0.00
Odessa, TX MSA	1	1.32	0.00	0.00	4.00	100.00	43.20	0.00	52.80	0.00	0.00	0.00	0.00	0.00	0.00
San Antonio-New Braunfels, TX MSA	1	1.32	0.65	0.00	15.70	0.00	46.68	0.00	36.86	100.00	0.00	0.00	0.00	0.00	0.00
Sherman-Denison, TX MSA	8	10.53	0.00	0.00	3.47	0.00	90.92	100.00	5.61	0.00	0.00	0.00	0.00	0.00	0.00
Tyler, TX MSA	0	0.00	2.93	0.00	21.34	0.00	22.59	0.00	53.14	0.00	0.00	0.00	0.00	0.00	0.00
Waco, TX MSA	0	0.00	1.08	0.00	8.54	0.00	44.72	0.00	45.66	0.00	0.00	0.00	0.00	0.00	0.00
Waco, TX MSA	2	2.63	1.60	0.00	30.48	0.00	34.22	0.00	33.69	100.00	0.00	0.00	0.00	0.00	0.00
Non-Metro TX	9	11.84	0.00	0.00	1.76	0.00	56.90	44.44	41.34	55.56	0.54	0.00	0.00	0.39	1.03
<b>State Total</b>	<b>76</b>	<b>100.00</b>	<b>1.79</b>	<b>0.00</b>	<b>15.98</b>	<b>5.26</b>	<b>45.99</b>	<b>50.00</b>	<b>36.12</b>	<b>44.74</b>	<b>0.37</b>	<b>0.00</b>	<b>0.00</b>	<b>0.42</b>	<b>0.50</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: Texas						Evaluation Period: January 1, 2007 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	46,163	32.09	22.61	3.74	17.36	17.28	18.97	24.57	41.06	54.41	7.53	6.67	7.23	7.64	7.73
<b>Limited Review:</b>															
Abilene, TX MSA	1,189	0.83	18.44	4.10	17.80	17.61	23.55	31.12	40.22	47.17	12.51	8.85	12.62	13.56	12.18
Arlington, TX MSA	701	0.49	20.66	11.34	18.68	26.80	21.68	30.34	38.98	31.52	3.12	2.42	3.99	3.11	2.68
Austin-Round Rock-San Marcos, TX MSA	16,456	11.44	19.76	5.76	18.30	23.41	22.76	25.92	39.17	44.91	6.42	5.68	6.66	6.89	6.11
Beaumont-Port Arthur, TX MSA	1,141	0.79	23.21	4.52	16.66	20.38	19.64	27.81	40.49	47.29	7.11	13.61	8.75	7.85	5.41
Brownsville-Harlingen, TX MSA	521	0.36	27.32	0.60	16.35	8.25	17.64	18.11	38.68	73.04	8.73	4.17	6.79	7.42	9.72
College Station-Bryan, TX MSA	1,015	0.71	23.04	2.81	15.66	11.78	17.13	24.32	44.17	61.08	6.88	5.41	7.71	7.20	6.63
Dallas-Plano-Irving, TX MD	30,739	21.37	21.32	6.19	18.00	21.07	20.39	24.40	40.30	48.35	5.21	4.77	5.30	5.31	5.19
El Paso-El Paso, TX MSA	3,209	2.23	22.11	1.61	17.46	10.93	18.92	23.82	41.51	63.64	7.30	7.84	8.92	7.67	6.76
El Paso-El Paso, TX MD	17,253	11.99	19.56	7.35	18.78	24.28	21.95	27.31	39.71	41.06	7.47	7.14	8.23	7.50	6.98
Killeen-Temple-Fort Hood, TX MSA	2,159	1.50	16.97	3.54	19.41	20.29	23.34	33.45	40.28	42.72	5.50	5.91	5.56	5.73	5.25
Laredo, TX MSA	1,063	0.74	22.96	1.18	16.89	10.26	18.19	22.19	41.96	66.37	7.37	2.50	8.41	8.04	7.00
Longview, TX MSA	868	0.60	20.39	3.67	16.86	17.83	20.16	30.72	42.60	47.79	4.04	8.33	4.17	4.51	3.44
McAllen-Edinburg-Mission, TX MSA	1,838	1.28	23.48	0.23	16.86	5.67	17.67	13.04	41.98	81.05	8.06	7.41	8.31	8.44	7.96
Midland, TX MSA	1,908	1.33	20.88	3.37	18.60	15.91	19.33	23.78	41.20	56.94	18.99	15.44	19.71	18.59	19.27
Odessa, TX MSA	615	0.43	21.22	2.39	17.50	16.01	21.98	31.35	39.30	50.26	8.92	12.24	7.33	9.62	8.93
San Antonio-New Braunfels, TX MSA	13,371	9.30	21.16	4.76	17.99	18.75	20.54	28.14	40.31	48.36	5.70	5.69	5.80	5.78	5.60
Sherman-Denison, TX MSA	610	0.42	19.46	10.09	18.09	20.18	23.05	26.75	39.40	42.98	2.53	1.95	2.27	2.20	3.07
Tyler, TX MSA	418	0.29	21.90	3.03	17.51	19.28	18.83	27.82	41.75	49.86	5.32	2.70	5.61	5.04	5.60
Waco, TX MSA	1,064	0.74	20.68	3.18	17.54	19.55	21.36	26.93	40.42	50.34	5.50	3.01	4.26	5.75	6.17
Wichita Falls, TX MSA	140	0.10	19.10	3.48	19.75	23.48	23.65	29.57	37.50	43.48	0.68	0.00	0.72	0.52	0.93
Non-Metro TX	1,401	0.97	16.54	1.78	15.64	10.85	19.33	23.11	48.49	64.27	5.64	4.00	6.15	4.80	5.88
<b>State Total</b>	<b>143,842</b>	<b>100.00</b>	<b>21.38</b>	<b>4.89</b>	<b>17.78</b>	<b>19.36</b>	<b>20.22</b>	<b>25.44</b>	<b>40.62</b>	<b>50.31</b>	<b>6.61</b>	<b>5.90</b>	<b>6.71</b>	<b>6.73</b>	<b>6.59</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all Home Purchase loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.4% of loans originated and purchased by bank.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: Texas								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	2,698	37.57	22.61	6.38	17.36	14.87	18.97	22.03	41.06	56.71	3.23	4.33	4.36	3.87	2.67
<b>Limited Review:</b>															
Abilene, TX MSA	47	0.65	18.44	8.89	17.80	15.56	23.55	31.11	40.22	44.44	1.54	9.09	0.00	3.13	0.70
Amarillo, TX MSA	31	0.43	20.66	3.85	18.68	19.23	21.68	30.77	38.98	46.15	1.37	0.00	0.00	2.78	1.61
Austin-Round Rock-San Marcos, TX MSA	517	7.20	19.76	6.17	18.30	19.51	22.76	25.43	39.17	48.89	2.37	1.28	1.69	2.51	2.71
Beaumont-Port Arthur, TX MSA	93	1.29	23.21	9.64	16.66	22.89	19.64	19.28	40.49	48.19	0.57	0.00	1.52	0.85	0.33
Brownsville-Harlingen, TX MSA	52	0.72	27.32	4.08	16.35	14.29	17.64	22.45	38.68	59.18	3.17	0.00	7.41	0.00	3.39
College Station-Bryan, TX MSA	15	0.21	23.04	0.00	15.66	7.14	17.13	14.29	44.17	78.57	3.57	0.00	0.00	5.88	3.75
Dallas-Plano-Irving, TX MD	1,528	21.28	21.32	10.09	18.00	19.78	20.39	20.47	40.30	49.66	3.30	1.54	4.76	4.57	2.83
El Paso-El Paso, TX MSA	217	3.02	22.11	7.46	17.46	11.44	18.92	14.43	41.51	66.67	0.46	0.00	0.54	0.91	0.35
El Paso-El Paso, TX MD	699	9.73	19.56	12.85	18.78	18.53	21.95	20.42	39.71	48.20	2.82	5.48	4.32	2.82	2.11
Killeen-Temple-Fort Hood, TX MSA	61	0.85	16.97	4.00	19.41	12.00	23.34	20.00	40.28	64.00	0.98	0.00	2.08	0.00	1.11
Laredo, TX MSA	23	0.32	22.96	8.70	16.89	4.35	18.19	26.09	41.96	60.87	0.00	0.00	0.00	0.00	0.00
Longview, TX MSA	45	0.63	20.39	5.88	16.86	11.76	20.16	29.41	42.60	52.94	1.35	0.00	0.00	2.50	1.53
McAllen-Edinburg-Mission, TX MSA	138	1.92	23.48	6.35	16.86	10.32	17.67	15.87	41.98	67.46	2.22	0.00	2.17	6.25	1.29
Midland, TX MSA	72	1.00	20.88	7.46	18.60	8.96	19.33	31.34	41.20	52.24	2.71	4.17	2.44	5.00	1.72
Odessa, TX MSA	72	1.00	21.22	4.29	17.50	10.00	21.98	17.14	39.30	68.57	6.67	14.29	0.00	12.50	5.75
San Antonio-New Braunfels, TX MSA	556	7.74	21.16	8.44	17.99	21.48	20.54	21.99	40.31	48.08	1.24	0.85	1.69	0.98	1.28
Sherman-Denison, TX MSA	75	1.04	19.46	9.38	18.09	15.63	23.05	28.13	39.40	46.88	4.32	0.00	4.35	10.00	2.47
Tyler, TX MSA	21	0.29	21.90	10.00	17.51	25.00	18.83	20.00	41.75	45.00	1.25	0.00	0.00	0.00	2.38
Waco, TX MSA	48	0.67	20.68	9.30	17.54	13.95	21.36	20.93	40.42	55.81	1.61	0.00	2.63	0.00	2.00
Waco, TX MSA	42	0.58	19.10	11.43	19.75	28.57	23.65	17.14	37.50	42.86	0.88	0.00	0.00	0.00	1.69
Non-Metro TX	132	1.84	16.54	3.17	15.64	11.11	19.33	16.67	48.49	69.05	1.00	0.00	1.56	1.19	0.95
<b>State Total</b>	<b>7,182</b>	<b>100.00</b>	<b>21.38</b>	<b>7.96</b>	<b>17.78</b>	<b>16.75</b>	<b>20.22</b>	<b>21.44</b>	<b>40.62</b>	<b>53.85</b>	<b>2.28</b>	<b>2.25</b>	<b>2.84</b>	<b>2.74</b>	<b>2.00</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all Home Improvement loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 27.3% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Texas								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Houston-Sugar Land-Baytown, TX MSA	32,875	31.37	22.61	2.87	17.36	10.55	18.97	18.80	41.06	67.79	9.77	6.49	8.74	9.00	10.22
<b>Limited Review:</b>															
Abilene, TX MSA	581	0.55	18.44	1.66	17.80	9.94	23.55	14.70	40.22	73.71	13.13	6.52	16.67	9.52	13.98
Arlington, TX MSA	329	0.31	20.66	4.74	18.68	12.25	21.68	28.06	38.98	54.94	1.88	2.29	1.16	2.73	1.70
Austin-Round Rock-San Marcos, TX MSA	12,197	11.64	19.76	4.11	18.30	14.74	22.76	22.42	39.17	58.73	8.80	7.21	9.13	9.13	8.70
Beaumont-Port Arthur, TX MSA	647	0.62	23.21	3.25	16.66	11.97	19.64	19.68	40.49	65.11	4.59	4.48	6.19	5.15	4.16
Brownsville-Harlingen, TX MSA	272	0.26	27.32	2.63	16.35	5.26	17.64	17.11	38.68	75.00	5.09	0.00	4.55	3.19	5.60
College Station-Bryan, TX MSA	507	0.48	23.04	1.13	15.66	8.39	17.13	20.18	44.17	70.29	8.39	2.70	8.82	8.29	8.50
Dallas-Plano-Irving, TX MD	27,072	25.83	21.32	4.04	18.00	12.46	20.39	20.20	40.30	63.30	7.95	7.14	8.17	8.00	7.94
El Paso-El Paso, TX MSA	2,197	2.10	22.11	1.70	17.46	7.57	18.92	16.90	41.51	73.83	7.30	3.47	4.67	7.27	7.73
El Paso-El Paso, TX MD	12,521	11.95	19.56	4.18	18.78	13.19	21.95	22.48	39.71	60.15	9.12	7.10	9.13	8.87	9.32
Killeen-Temple-Fort Hood, TX MSA	1,068	1.02	16.97	3.32	19.41	10.12	23.34	21.99	40.28	64.57	8.48	7.92	9.46	7.78	8.58
Laredo, TX MSA	399	0.38	22.96	0.31	16.89	6.56	18.19	19.06	41.96	74.06	6.78	0.00	5.48	4.58	7.32
Longview, TX MSA	381	0.36	20.39	4.64	16.86	13.00	20.16	25.08	42.60	57.28	5.66	3.23	9.21	5.97	4.94
McAllen-Edinburg-Mission, TX MSA	1,159	1.11	23.48	0.32	16.86	5.71	17.67	9.63	41.98	84.34	6.96	0.00	4.46	4.64	7.56
Midland, TX MSA	946	0.90	20.88	2.55	18.60	10.53	19.33	19.84	41.20	67.07	19.11	11.11	17.49	18.36	19.87
Odessa, TX MSA	374	0.36	21.22	1.46	17.50	9.06	21.98	23.10	39.30	66.37	9.79	0.00	8.75	6.16	11.26
San Antonio-New Braunfels, TX MSA	8,468	8.08	21.16	3.89	17.99	11.26	20.54	19.82	40.31	65.03	6.98	4.74	6.26	6.52	7.35
Sherman-Denison, TX MSA	506	0.48	19.46	7.02	18.09	14.77	23.05	24.70	39.40	53.51	6.60	8.70	4.69	6.33	6.99
Tyler, TX MSA	287	0.27	21.90	4.98	17.51	13.12	18.83	20.81	41.75	61.09	5.16	5.45	4.69	5.02	5.25
Waco, TX MSA	661	0.63	20.68	2.51	17.54	10.81	21.36	16.99	40.42	69.69	7.37	6.06	6.91	4.99	8.26
Waco, TX MSA	208	0.20	19.10	4.83	19.75	20.00	23.65	24.14	37.50	51.03	0.88	2.22	1.87	0.00	0.91
Non-Metro TX	1,146	1.09	16.54	2.79	15.64	5.68	19.33	16.43	48.49	75.10	8.54	10.53	6.67	11.59	8.11
<b>State Total</b>	<b>104,801</b>	<b>100.00</b>	<b>21.38</b>	<b>3.52</b>	<b>17.78</b>	<b>11.79</b>	<b>20.22</b>	<b>20.09</b>	<b>40.62</b>	<b>64.61</b>	<b>8.51</b>	<b>6.49</b>	<b>8.26</b>	<b>8.26</b>	<b>8.72</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 26.1% of loans originated and purchased by bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Texas			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Houston-Sugar Land-Baytown, TX MSA	10,532	35.58	79.12	60.49	85.24	7.53	7.23	0.73	1.01
<b>Limited Review:</b>									
Abilene, TX MSA	40	0.14	75.28	40.00	87.50	5.00	7.50	0.35	0.00
Amarillo, TX MSA	67	0.23	74.69	25.37	59.70	14.93	25.37	0.18	0.21
Austin-Round Rock-San Marcos, TX MSA	2,361	7.98	79.05	51.63	85.05	6.86	8.09	0.63	0.59
Beaumont-Port Arthur, TX MSA	178	0.60	77.48	36.52	67.42	17.42	15.17	0.49	0.22
Brownsville-Harlingen, TX MSA	188	0.64	76.73	48.94	70.74	12.23	17.02	1.27	1.56
College Station-Bryan, TX MSA	68	0.23	76.37	14.71	89.71	4.41	5.88	0.31	0.00
Dallas-Plano-Irving, TX MD	8,361	28.25	78.17	63.51	86.32	7.08	6.60	0.72	0.98
El Paso, TX MSA	717	2.42	75.18	44.35	77.13	10.46	12.41	0.90	0.83
El Paso-Wichita Falls, TX MD	3,474	11.74	80.44	64.91	86.33	6.07	7.60	0.61	0.61
Killeen-Temple-Fort Hood, TX MSA	52	0.18	78.71	32.69	86.54	11.54	1.92	0.17	0.26
Laredo, TX MSA	222	0.75	75.15	26.13	97.30	2.70	0.00	0.67	0.51
Longview, TX MSA	157	0.53	74.11	50.96	78.34	5.10	16.56	0.48	1.02
McAllen-Edinburg-Mission, TX MSA	417	1.41	76.36	36.21	88.01	4.80	7.19	0.67	0.39
Midland, TX MSA	109	0.37	75.57	22.02	81.65	5.50	12.84	0.32	0.14
Odessa, TX MSA	131	0.44	75.71	20.61	76.34	3.05	20.61	0.90	0.90
San Antonio-New Braunfels, TX MSA	1,886	6.37	78.84	44.80	88.76	5.51	5.73	0.48	0.46
Sherman-Denison, TX MSA	66	0.22	78.76	48.48	87.88	9.09	3.03	0.33	0.45
Tyler, TX MSA	95	0.32	76.28	37.89	72.63	7.37	20.00	0.26	0.00
Waco, TX MSA	111	0.37	77.16	22.52	75.68	10.81	13.51	0.23	0.43
Waco-Texas, TX MSA	96	0.32	77.16	31.25	70.83	8.33	20.83	0.80	0.26
Non-Metro TX	273	0.92	80.56	44.32	83.15	6.59	10.26	0.49	0.35
<b>State Total</b>	<b>29,601</b>	<b>100.00</b>	<b>78.56</b>	<b>57.83</b>	<b>85.35</b>	<b>7.12</b>	<b>7.53</b>	<b>0.64</b>	<b>0.75</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 16.14% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Texas			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Houston-Sugar Land-Baytown, TX MSA	11	14.47	96.39	63.64	100.00	0.00	0.00	0.28	0.00
<b>Limited Review:</b>									
Abilene, TX MSA	1	1.32	96.70	100.00	100.00	0.00	0.00	0.00	0.00
Amarillo, TX MSA	1	1.32	95.79	0.00	100.00	0.00	0.00	0.00	0.00
Armadillo-Rock-San Marcos, TX MSA	3	3.95	96.67	0.00	33.33	33.33	33.33	0.27	0.00
Beaumont-Port Arthur, TX MSA	0	0.00	98.64	0.00	0.00	0.00	0.00	0.00	0.00
Brownsville-Harlingen, TX MSA	0	0.00	95.28	0.00	0.00	0.00	0.00	0.00	0.00
College Station-Bryan, TX MSA	2	2.63	95.02	100.00	100.00	0.00	0.00	0.00	0.00
Dallas-Plano-Irving, TX MD	11	14.47	95.71	72.73	100.00	0.00	0.00	0.46	0.35
El Paso, TX MSA	0	0.00	93.71	0.00	0.00	0.00	0.00	0.00	0.00
El Paso-Wichita Falls, TX MD	11	14.47	97.13	54.55	90.91	9.09	0.00	0.90	0.68
Killeen-Temple-Fort Hood, TX MSA	0	0.00	97.69	0.00	0.00	0.00	0.00	0.00	0.00
Laredo, TX MSA	1	1.32	93.18	0.00	100.00	0.00	0.00	0.00	0.00
Longview, TX MSA	0	0.00	98.31	0.00	0.00	0.00	0.00	0.00	0.00
McAllen-Edinburg-Mission, TX MSA	3	3.95	91.42	33.33	66.67	0.00	33.33	0.00	0.00
Midland, TX MSA	11	14.47	97.70	90.91	9.09	63.64	27.27	10.71	13.64
Odessa, TX MSA	1	1.32	96.00	0.00	100.00	0.00	0.00	0.00	0.00
San Antonio-New Braunfels, TX MSA	1	1.32	97.07	0.00	0.00	0.00	100.00	0.00	0.00
Sherman-Denison, TX MSA	8	10.53	98.68	25.00	25.00	37.50	37.50	0.00	0.00
Tyler, TX MSA	0	0.00	97.49	0.00	0.00	0.00	0.00	0.00	0.00
Waco, TX MSA	0	0.00	98.24	0.00	0.00	0.00	0.00	0.00	0.00
Wichita Falls, TX MSA	2	2.63	98.40	0.00	0.00	0.00	100.00	0.00	0.00
Non-Metro TX	9	11.84	97.01	44.44	77.78	0.00	22.22	0.54	0.00
<b>State Total</b>	<b>76</b>	<b>100.00</b>	<b>96.48</b>	<b>53.95</b>	<b>67.11</b>	<b>15.79</b>	<b>17.11</b>	<b>0.37</b>	<b>0.21</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 18.42% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS									
Geography: Texas									
January 1, 2007 to December 31, 2010									
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Houston-Baytown-Sugar Land, TX MSA	50	89,524	215	148,304	265	237,828	40.35%	10	36,199
<b>Limited Review:</b>									
Abilene, TX MSA	3	619	2	2,967	5	3,586	0.61%	1	129
Amarillo, TX MSA	5	7,398	4	1,778	9	9,176	1.56%	0	0
Austin-Round Rock, TX MSA	12	12,830	97	47,592	109	60,422	10.25%	3	40
Beaumont-Port Arthur, TX MSA	4	3,086	2	14,456	6	17,542	2.98%	0	0
Brownsville-Harlingen, TX MSA	3	2,660	12	1,744	15	4,404	0.75%	1	4
College Station-Bryan, TX MSA	5	411	0	0	5	411	0.07%	0	0
Dallas-Plano-Irving, TX MD	28	40,769	189	25,734	217	66,503	11.28%	3	5,545
El Paso, TX MSA	18	2,983	56	27,677	74	30,660	5.20%	0	0
Fort Worth-Arlington, TX MD	15	24,963	117	7,904	132	32,867	5.58%	2	5,792
Killeen-Temple-Fort Hood, TX MSA	2	2,412	0	0	2	2,412	0.41%	1	60
Laredo, TX MSA	0	0	3	18	3	18	0.00%	0	0
Longview, TX MSA	2	6,099	2	10	4	6,109	1.04%	0	0
McAllen-Edinburg-Pharr, TX MSA	8	7,955	17	304	25	8,259	1.40%	1	12
Midland, TX MSA	1	463	0	0	1	463	0.08%	0	0
Odessa, TX MSA	1	85	5	2,956	6	3,041	0.52%	0	0
San Antonio, TX MSA	18	34,083	86	53,797	104	87,880	14.91%	4	12,092
Sherman-Denison, TX MSA	0	0	1	5	1	5	0.00%	0	0
Tyler, TX MSA	3	8,569	3	8,112	6	16,681	2.83%	0	0
Waco, TX MSA	2	184	2	6	4	190	0.03%	0	0
Wichita Falls, TX MSA	1	52	1	5	2	57	0.01%	0	0
Non-Metro - Texas	4	753	2	118	6	871	0.15%	0	0
<b>State Total</b>	<b>185</b>	<b>245,898</b>	<b>816</b>	<b>343,487</b>	<b>1001</b>	<b>589,385</b>	<b>100.00%</b>	<b>26</b>	<b>59,873</b>
Statewide Investments with Potential to Benefit one or more AAs	16	4,663	26	42,930	42	47,593	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	3	3,668	4	17	7	3,685	N/A	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Texas																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Houston-Sugar Land-Baytown, TX MSA	51.20	217	33.49	3.69	19.82	25.81	49.77	22	3	0	0	8	11	6.43	30.28	31.45	31.74
<b>Limited Review:</b>																	
Abilene, TX MSA	0.15	2	0.31	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	19.54	50.36	28.92
Amarillo, TX MSA	0.26	3	0.46	66.67	0.00	33.33	0.00	0	0	0	0	0	0	2.14	34.85	34.77	28.25
Austin-Round Rock-San Marcos, TX MSA	4.12	66	10.19	6.06	7.58	50.00	36.36	14	3	1	0	5	5	8.31	25.66	39.38	26.46
Beaumont-Port Arthur, TX MSA	0.55	7	1.08	0.00	28.57	42.86	28.57	2	1	0	0	1	0	4.64	23.23	43.77	26.15
Brownsville-Harlingen, TX MSA	0.39	3	0.46	0.00	33.33	0.00	66.67	1	0	0	0	0	1	4.93	37.57	29.63	27.88
College Station-Bryan, TX MSA	0.10	3	0.46	0.00	33.33	0.00	66.67	2	1	-1	0	0	2	2.27	29.66	35.40	26.28
Dallas-Plano-Irving, TX MD	30.65	179	27.62	2.23	17.88	27.37	51.96	26	12	0	-1	3	12	7.60	27.39	34.04	30.98
El Paso, TX MSA	1.25	11	1.70	18.18	27.27	18.18	36.36	2	0	0	0	2	0	3.70	30.92	33.98	31.40
Fort Worth-Arlington, TX MD	6.15	68	10.49	1.47	22.06	38.24	38.24	10	3	0	1	2	4	5.10	24.80	41.72	28.37
Killeen-Temple-Fort Hood, TX MSA	0.07	2	0.31	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.98	15.19	54.26	29.56
Laredo, TX MSA	0.04	3	0.46	0.00	0.00	66.67	33.33	2	0	0	0	1	1	0.52	38.06	33.72	27.69
Longview, TX MSA	0.25	3	0.46	0.00	33.33	33.33	33.33	1	0	0	0	0	1	0.00	30.08	41.47	28.45
MSA Allen-Edinburg-Mission, TX	0.71	7	1.08	0.00	14.29	28.57	57.14	4	0	0	0	1	3	0.00	29.73	48.29	21.98
Midland, TX MSA	0.19	3	0.46	0.00	66.67	0.00	33.33	0	0	0	0	0	0	5.79	19.81	43.64	30.76
Odessa, TX MSA	0.30	2	0.31	0.00	0.00	0.00	100.00	0	0	0	0	0	0	1.84	19.77	42.31	36.08
San Antonio-New Braunfels, TX MSA	1.64	49	7.56	0.00	26.53	34.69	38.78	15	1	0	0	2	12	2.45	35.31	35.83	26.41
Sherman-Denison, TX MSA	0.26	3	0.46	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	17.24	73.81	8.94
Tyler, TX MSA	0.27	4	0.62	0.00	50.00	0.00	50.00	3	0	0	2	0	1	5.62	38.04	19.94	36.40
Waco, TX MSA	0.38	3	0.46	0.00	66.67	0.00	33.33	0	0	0	0	0	0	10.94	25.71	31.10	32.24
Wichita Falls, TX MSA	0.44	4	0.62	0.00	50.00	0.00	50.00	0	0	0	0	0	0	2.31	29.92	40.25	27.53
Non-Metro TX	0.64	6	0.93	0.00	16.67	33.33	50.00	1	0	0	0	0	1	0.00	6.35	52.35	41.30
State Total	100.00	648	100.00	3.24	19.91	30.56	45.83	106	24	0	2	26	54	5.41	28.48	36.37	29.58

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 171 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.



**Table 1. Lending Volume**

Lending Volume		Utah						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Salt Lake City, UT MSA ^	51.32	12,812	3,086,323	1,472	212,539	1	35	13	23,269	14,298	3,322,166	94.51
<b>Limited Review:</b>												
Logan, UT-ID MSA ^^	2.12	563	87,517	27	1,709	0	0	0	0	590	89,226	0.29
Ogden-Clearfield, UT MSA ^	22.35	5,809	1,117,039	412	50,458	0	0	6	17,080	6,227	1,184,577	2.46
Provo-Orem, UT MSA ^	19.38	4,931	1,060,087	463	57,033	5	112	1	31	5,400	1,117,263	2.00
St. George, UT MSA ^^	2.91	774	204,200	34	1,473	1	14	2	48	811	205,735	0.58
Non-Metro UT ^^	1.92	522	77,420	12	542	0	0	1	41	535	78,003	0.16
	100.00	25,411	5,632,586	2,420	323,754	7	161	23	40,469	27,861	5,996,970	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	10,197	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	1,584	0	0	N/A

\* Deposit data as of June 30, 2010.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

Table 1. Other Products

Lending Volume		Utah										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	94.51	
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.29	
Ogden-Clearfield, UT MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.46	
Provo-Orem, UT MSA ^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.00	
St. George, UT MSA ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.58	
Non-Metro UT ^^	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.16	
Statewide	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	3,884	45.16	0.20	0.31	16.53	16.50	52.75	53.86	30.52	29.33	2.55	2.35	2.09	2.67	2.57
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	273	3.17	0.31	0.00	20.62	11.72	42.42	53.48	36.65	34.80	7.30	0.00	2.28	11.05	7.01
Ogden-Clearfield, UT MSA ^	1,822	21.19	0.84	1.21	13.51	15.70	59.46	60.26	26.19	22.83	2.65	0.65	2.82	2.72	2.45
Provo-Orem, UT MSA ^	2,057	23.92	1.40	1.02	10.97	5.30	54.53	71.75	33.10	21.93	3.71	0.90	0.80	5.51	1.06
St. George, UT MSA ^^	328	3.81	0.00	0.00	9.35	7.93	71.27	75.00	19.38	17.07	2.68	0.00	1.88	3.11	1.62
Non-Metro UT ^^	236	2.74	0.00	0.00	0.00	0.00	59.23	75.85	40.77	24.15	13.74	0.00	0.00	15.76	9.49
State Total ^^	8,600	100.00	0.52	0.64	14.38	12.72	55.28	60.90	29.82	25.74	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	246	60.00	0.20	0.41	16.53	16.26	52.75	48.78	30.52	34.55	1.77	0.00	0.65	1.26	2.92
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	8	1.95	0.31	0.00	20.62	50.00	42.42	37.50	36.65	12.50	0.78	0.00	3.70	0.00	0.00
Ogden-Clearfield, UT MSA ^	85	20.73	0.84	1.18	13.51	4.71	59.46	61.18	26.19	32.94	1.24	0.00	0.00	0.86	2.65
Provo-Orem, UT MSA ^	49	11.95	1.40	2.04	10.97	4.08	54.53	48.98	33.10	44.90	0.86	0.00	0.00	0.33	1.67
St. George, UT MSA ^^	14	3.41	0.00	0.00	9.35	7.14	71.27	57.14	19.38	35.71	0.85	0.00	0.00	1.32	0.00
Non-Metro UT ^^	8	1.95	0.00	0.00	0.00	0.00	59.23	50.00	40.77	50.00	0.00	0.00	0.00	0.00	0.00
State Total ^^	410	100.00	0.52	0.73	14.38	12.44	55.28	51.46	29.82	35.37	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	8,649	52.87	0.20	0.16	16.53	10.83	52.75	52.24	30.52	36.77	3.36	4.07	2.68	3.13	3.98
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	282	1.72	0.31	0.00	20.62	17.73	42.42	43.26	36.65	39.01	2.52	0.00	2.84	2.92	2.03
Ogden-Clearfield, UT MSA ^	3,897	23.82	0.84	0.59	13.51	8.83	59.46	59.38	26.19	31.20	3.04	0.57	2.51	2.79	3.88
Provo-Orem, UT MSA ^	2,821	17.24	1.40	1.13	10.97	5.00	54.53	53.28	33.10	40.59	2.10	2.26	1.44	2.12	2.17
St. George, UT MSA ^^	432	2.64	0.00	0.00	9.35	8.10	71.27	64.81	19.38	27.08	3.11	0.00	1.78	3.28	3.07
Non-Metro UT ^^	278	1.70	0.00	0.00	0.00	0.00	59.23	60.79	40.77	39.21	4.47	0.00	0.00	4.79	4.04
State Total ^^	16,359	100.00	0.52	0.42	14.38	9.21	55.28	54.44	29.82	35.93	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all refinance loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	33	78.57	3.14	0.00	49.56	45.45	36.55	45.45	10.76	9.09	2.44	0.00	4.00	0.00	0.00
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	0	0.00	25.11	0.00	67.14	0.00	5.77	0.00	1.98	0.00	0.00	0.00	0.00	0.00	0.00
Ogden-Clearfield, UT MSA ^	5	11.90	10.09	0.00	37.76	20.00	43.01	80.00	9.14	0.00	0.00	0.00	0.00	0.00	0.00
Provo-Orem, UT MSA ^	4	9.52	37.41	100.00	29.69	0.00	28.80	0.00	4.10	0.00	0.00	0.00	0.00	0.00	0.00
St. George, UT MSA ^^	0	0.00	0.00	0.00	17.60	0.00	80.02	0.00	2.38	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro UT ^^	0	0.00	0.00	0.00	0.00	0.00	80.53	0.00	19.47	0.00	0.00	0.00	0.00	0.00	0.00
State Total ^^	42	100.00	9.80	9.52	44.11	38.10	37.01	45.24	9.08	7.14	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\* Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by the number of multi-family housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES		Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010					
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
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	1,472	60.83	6.16	12.98	18.97	20.72	41.23	37.84	33.65	28.46	0.51	1.49	0.63	0.40	0.36
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	27	1.12	1.25	0.00	31.54	44.44	36.10	40.74	31.11	14.81	0.04	0.00	0.00	0.11	0.00
Ogden-Clearfield, UT MSA ^	412	17.02	4.41	10.44	14.68	22.82	53.48	45.15	27.43	21.60	0.40	1.28	0.67	0.34	0.21
Provo-Orem, UT MSA ^	463	19.13	2.75	2.81	11.06	16.20	49.43	52.92	36.74	28.08	0.42	0.37	0.60	0.49	0.27
St. George, UT MSA ^^	34	1.40	0.00	0.00	10.37	14.71	71.03	70.59	18.61	14.71	0.31	0.00	0.27	0.36	0.15
Non-Metro UT ^^	12	0.50	0.00	0.00	0.00	0.00	63.74	16.67	36.26	83.33	0.00	0.00	0.00	0.00	0.00
State Total ^^	2,420	100.00	4.45	10.21	16.24	20.29	47.22	42.36	32.08	27.15	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	1	14.29	2.49	0.00	14.45	0.00	48.38	0.00	34.68	100.00	0.98	0.00	0.00	0.00	2.78
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	0	0.00	0.28	0.00	10.47	0.00	60.61	0.00	28.65	0.00	0.00	0.00	0.00	0.00	0.00
Ogden-Clearfield, UT MSA ^	0	0.00	2.37	0.00	9.82	0.00	62.87	0.00	24.94	0.00	0.00	0.00	0.00	0.00	0.00
Provo-Orem, UT MSA ^	5	71.43	0.79	0.00	7.15	60.00	61.07	20.00	30.99	20.00	0.00	0.00	0.00	0.00	0.00
St. George, UT MSA ^^	1	14.29	0.00	0.00	6.08	0.00	72.64	100.00	21.28	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro UT ^^	0	0.00	0.00	0.00	0.00	0.00	58.47	0.00	41.53	0.00	0.00	0.00	0.00	0.00	0.00
State Total ^^	7	100.00	1.58	0.00	10.05	42.86	57.42	28.57	30.95	28.57	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state



**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	3,884	45.16	16.76	7.38	19.97	23.72	24.84	26.57	38.44	42.32	2.22	2.10	1.71	2.17	2.86
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	273	3.17	17.17	9.77	20.15	45.86	23.47	33.83	39.21	10.53	2.07	3.14	2.01	2.46	1.31
Ogden-Clearfield, UT MSA ^	1,822	21.19	15.92	10.10	20.34	28.71	25.67	27.11	38.07	34.08	2.90	2.94	3.08	2.78	2.73
Provo-Orem, UT MSA ^	2,057	23.92	17.85	4.34	19.45	31.11	24.56	31.53	38.14	33.01	1.59	1.28	1.77	1.71	1.31
St. George, UT MSA ^^	328	3.81	16.37	9.38	19.57	29.69	25.69	20.83	38.37	40.10	1.53	2.00	1.11	1.61	1.66
Non-Metro UT ^^	236	2.74	10.34	9.52	15.56	34.13	24.42	39.68	49.68	16.67	3.10	3.03	1.65	4.82	2.46
State Total ^^	8,600	100.00	16.61	7.52	19.85	27.38	24.95	28.03	38.59	37.07	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all Home Purchase loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 24.5% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: Utah								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA ^	246	60.00	16.76	3.43	19.97	20.57	24.84	27.43	38.44	48.57	1.87	0.93	0.65	2.87	2.11
<b>Limited Review:</b>															
Logan, UT-ID MSA ^^	8	1.95	17.17	0.00	20.15	0.00	23.47	100.00	39.21	0.00	0.82	0.00	0.00	2.78	0.00
Ogden-Clearfield, UT MSA ^	85	20.73	15.92	6.25	20.34	17.19	25.67	31.25	38.07	45.31	1.27	1.33	1.04	1.05	1.61
Provo-Orem, UT MSA ^	49	11.95	17.85	0.00	19.45	18.18	24.56	30.30	38.14	51.52	0.73	0.00	1.03	0.00	1.14
St. George, UT MSA ^^	14	3.41	16.37	0.00	19.57	0.00	25.69	66.67	38.37	33.33	0.94	0.00	0.00	0.00	1.67
Non-Metro UT ^^	8	1.95	10.34	0.00	15.56	0.00	24.42	25.00	49.68	75.00	0.00	0.00	0.00	0.00	0.00
State Total ^^	410	100.00	16.61	3.57	19.85	18.93	24.95	29.29	38.59	48.21	N/A	N/A	N/A	N/A	N/A

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all Home Improvement loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 31.7% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Utah										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Salt Lake City, UT MSA ^	8,649	52.87	16.76	5.63	19.97	19.96	24.84	28.03	38.44	46.38	4.07	4.08	3.75	3.81	4.43	
<b>Limited Review:</b>																
Logan, UT-ID MSA ^^	282	1.72	17.17	4.98	20.15	24.88	23.47	29.85	39.21	40.30	2.57	3.77	3.50	2.59	2.06	
Ogden-Clearfield, UT MSA ^	3,897	23.82	15.92	6.24	20.34	21.44	25.67	29.83	38.07	42.48	3.59	2.82	3.65	3.09	4.18	
Provo-Orem, UT MSA ^	2,821	17.24	17.85	3.83	19.45	16.55	24.56	30.70	38.14	48.92	2.60	3.31	2.74	2.49	2.55	
St. George, UT MSA ^^	432	2.64	16.37	7.22	19.57	13.72	25.69	24.91	38.37	54.15	3.83	5.56	3.39	3.73	3.85	
Non-Metro UT ^^	278	1.70	10.34	2.60	15.56	20.31	24.42	27.08	49.68	50.00	4.10	1.64	5.52	3.96	3.93	
State Total ^^	16,359	100.00	16.61	5.45	19.85	19.69	24.95	28.86	38.59	45.99	N/A	N/A	N/A	N/A	N/A	

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 23.8% of loans originated and purchased by bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Utah			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Salt Lake City, UT MSA ^	1,472	60.83	79.40	47.35	74.12	10.67	15.22	0.51	0.41
<b>Limited Review:</b>									
Logan, UT-ID MSA ^^	27	1.12	81.57	70.37	88.89	3.70	7.41	0.04	0.00
Ogden-Clearfield, UT MSA ^	412	17.02	82.46	55.83	76.70	11.89	11.41	0.40	0.23
Provo-Orem, UT MSA ^	463	19.13	84.77	50.76	79.91	8.86	11.23	0.42	0.25
St. George, UT MSA ^^	34	1.40	81.22	32.35	94.12	5.88	0.00	0.31	0.00
Non-Metro UT ^^	12	0.50	80.13	100.00	100.00	0.00	0.00	0.00	0.00
State Total ^^	2,420	100.00	81.28	49.75	76.24	10.33	13.43	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 13.97% of small loans to businesses originated and purchased by the bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Utah			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Salt Lake City, UT MSA ^	1	14.29	95.39	100.00	100.00	0.00	0.00	0.98	1.25
<b>Limited Review:</b>									
Logan, UT-ID MSA ^^	0	0.00	98.07	0.00	0.00	0.00	0.00	0.00	0.00
Ogden-Clearfield, UT MSA ^	0	0.00	97.63	0.00	0.00	0.00	0.00	0.00	0.00
Provo-Orem, UT MSA ^	5	71.43	96.37	20.00	100.00	0.00	0.00	0.00	0.00
St. George, UT MSA ^^	1	14.29	97.26	0.00	100.00	0.00	0.00	0.00	0.00
Non-Metro UT ^^	0	0.00	96.49	0.00	0.00	0.00	0.00	0.00	0.00
State Total ^^	7	100.00	96.48	28.57	100.00	0.00	0.00	N/A	N/A

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 71.43% of small loans to farms originated and purchased by the bank.

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

^^^ State Total Market Share cannot be calculated due to multiple examination periods for this state

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Utah				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	# Evaluation Period:	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Salt Lake City, UT MSA	25	4,952	230	18,030	255	22,982	81.47%	0	0
<b>Limited Review:</b>									
Logan, UT-ID MSA	2	432	0	0	2	432	1.53%	0	0
Ogden-Clearfield, UT MSA	7	1,315	1	544	8	1,859	6.59%	0	0
Provo-Orem, UT MSA	3	265	14	1,056	17	1,321	4.68%	0	0
St. George, UT MSA	4	1,234	6	215	10	1,449	5.14%	0	0
Non-Metro - Utah	3	166	0	0	3	166	0.59%	0	0
<b>State Total</b>	<b>44</b>	<b>8,364</b>	<b>251</b>	<b>19,845</b>	<b>295</b>	<b>28,209</b>	<b>100.00%</b>	<b>0</b>	<b>0</b>
Statewide Investments with Potential to Benefit one or more AAs	3	57	12	4,851	15	4,908	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	6	29	6	29	N/A	0	0

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Utah																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Salt Lake City, UT MSA ^	94.51	41	63.08	7.32	17.07	41.46	34.15	2	3	0	0	-3	2	0.79	22.59	49.65	26.97
<b>Limited Review:</b>																	
Logan, UT-ID MSA ^^	0.29	2	3.08	0.00	50.00	50.00	0.00	0	0	0	0	0	0	4.30	32.60	35.15	27.95
Ogden-Clearfield, UT MSA ^	2.46	10	15.38	10.00	20.00	60.00	10.00	2	0	0	0	1	1	2.29	16.87	55.98	24.85
Provo-Orem, UT MSA ^	2.00	8	12.31	12.50	25.00	50.00	12.50	3	1	0	0	1	1	8.86	14.60	48.47	27.91
St. George, UT MSA ^^	0.58	3	4.62	0.00	0.00	100.00	0.00	2	0	0	0	2	0	0.00	10.35	72.42	17.23
Non-Metro UT ^^	0.16	1	1.54	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	61.20	38.80
State Total	100.00	65	100.00	7.69	18.46	47.69	26.15	9	4	0	0	1	4	2.74	19.26	51.43	26.54

Demographic Data Source: 2000 Census

^ Evaluation Period: January 1, 2007 to December 31, 2010

^^ Evaluation Period: September 26, 2008 to December 31, 2010

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 32 of the branches are a result of bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		Washington						Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		State: Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Seattle-Bellevue-Everett, WA MD	51.74	31,210	9,615,903	2,126	137,905	4	357	80	213,552	33,420	9,967,717	68.14
<b>Limited Review</b>												
Bellingham, WA MSA	4.34	2,713	623,760	86	6,514	1	38	6	3,324	2,806	633,636	2.06
Bremerton-Silverdale, WA MSA	5.58	3,471	782,799	136	8,473	0	0	0	0	3,607	791,272	3.35
Kennewick-Pasco-Richland, WA MSA	2.07	1,250	196,228	88	4,287	0	0	2	1,698	1,340	202,213	1.33
Longview, WA MSA	1.16	733	124,640	16	1,082	0	0	3	1,278	752	127,000	0.74
Mount Vernon-Anacortes, WA MSA	1.83	1,151	262,409	29	2,382	0	0	3	3,039	1,183	267,830	0.53
Olympia, WA MSA	3.33	2,092	441,780	61	4,841	0	0	1	3,330	2,154	449,951	1.74
Spokane, WA MSA	5.46	3,222	523,192	297	18,325	1	14	7	974	3,527	542,505	5.87
Pacoma, WA MD	11.24	6,977	1,627,718	270	22,586	1	34	15	10,764	7,263	1,661,102	6.86
Wenatchee-East Wenatchee, WA MSA	1.35	832	181,329	36	1,728	0	0	1	235	869	183,292	0.96
Yakima, WA MSA	1.90	1,161	179,639	61	2,398	0	0	3	2,151	1,225	184,188	1.63
Non-Metro WA	9.98	6,201	1,198,969	229	9,999	2	53	11	15,999	6,443	1,225,020	6.78
	100.00	61,013	15,758,366	3,435	220,520	9	496	132	256,344	64,589	16,235,726	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	3	8,200	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.



Table 1. Other Products

Lending Volume		Washington				Evaluation Period: September 26, 2008 to December 31, 2010								
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Seattle-Bellevue-Everett, WA MD	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	68.14
<b>Limited Review:</b>														
Bellingham, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.06
Bremerton-Silverdale, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3.35
Kennewick-Pasco-Richland, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.33
Longview, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.74
Longview-Enclave-Macortes, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.53
Olympia, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.74
Port Angeles, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.87
Spokane, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.86
Wenatchee-East Wenatchee, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.96
Yakima, WA MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	1.63
Non-Metro WA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.78
Statewide	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: Washington						Evaluation Period: September 26, 2008 to December 31, 2010						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	6,192	45.30	0.49	0.84	15.58	15.10	55.45	55.25	28.48	28.81	3.61	2.41	3.07	4.03	3.15
<b>Limited Review:</b>															
<del>Bellingham, WA MSA</del>	675	4.94	0.00	0.00	8.83	8.44	71.28	66.96	19.90	24.59	6.75	0.00	5.11	6.50	8.26
Bremerton-Silverdale, WA MSA	825	6.04	1.75	2.55	9.31	11.39	69.62	72.48	19.32	13.58	8.04	7.02	7.37	8.90	4.49
Kennewick-Pasco-Richland, WA MSA	382	2.79	2.95	2.88	13.08	7.33	55.11	67.80	28.86	21.99	2.20	1.50	1.11	2.93	1.49
Longview, WA MSA	168	1.23	2.18	1.19	10.31	2.98	66.32	79.17	21.20	16.67	5.74	0.00	2.02	6.43	5.52
Lombard-Wenatchee-Anacortes, WA MSA	272	1.99	0.00	0.00	9.11	5.51	71.16	77.57	19.73	16.91	5.28	0.00	3.01	5.34	6.15
Olympia, WA MSA	523	3.83	0.00	0.00	12.34	9.37	68.09	71.13	19.57	19.50	3.67	0.00	4.05	3.58	3.82
Portland, OR MSA	688	5.03	0.28	0.29	21.71	20.35	44.82	46.08	33.20	33.28	2.68	0.00	1.77	3.11	2.87
Spokane, WA MSA	1,793	13.12	0.50	0.45	10.96	8.03	63.09	66.65	25.46	24.87	4.56	2.78	3.24	4.97	4.09
Wenatchee-East Wenatchee, WA MSA	168	1.23	0.00	0.00	18.55	11.90	54.40	52.38	27.04	35.71	3.57	0.00	1.95	3.69	4.36
Yakima, WA MSA	335	2.45	1.43	0.30	22.04	13.13	38.95	45.07	37.58	41.49	4.61	0.00	3.40	6.06	3.87
Non-Metro WA	1,649	12.06	0.08	0.18	11.26	10.55	70.75	67.07	17.91	22.20	5.92	9.52	5.93	5.90	5.96
<b>State Total</b>	<b>13,670</b>	<b>100.00</b>	<b>0.57</b>	<b>0.73</b>	<b>14.29</b>	<b>12.47</b>	<b>59.08</b>	<b>60.74</b>	<b>26.06</b>	<b>26.06</b>	<b>4.16</b>	<b>2.84</b>	<b>3.16</b>	<b>4.66</b>	<b>3.66</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: Washington								Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	582	46.19	0.49	0.69	15.58	9.28	55.45	58.59	28.48	31.44	4.78	0.00	2.25	5.06	5.40
<b>Limited Review:</b>															
Bellingham, WA MSA	66	5.24	0.00	0.00	8.83	6.06	71.28	71.21	19.90	22.73	7.64	0.00	3.33	7.69	9.09
Bremerton-Silverdale, WA MSA	112	8.89	1.75	1.79	9.31	10.71	69.62	67.86	19.32	19.64	8.27	0.00	10.53	7.91	9.18
Kennewick-Pasco-Richland, WA MSA	15	1.19	2.95	0.00	13.08	13.33	55.11	73.33	28.86	13.33	0.24	0.00	0.00	0.46	0.00
Longview, WA MSA	16	1.27	2.18	0.00	10.31	12.50	66.32	62.50	21.20	25.00	3.91	0.00	0.00	3.25	7.89
Lombard-Wenatchee-Anacortes, WA MSA	19	1.51	0.00	0.00	9.11	10.53	71.16	52.63	19.73	36.84	4.88	0.00	0.00	4.55	7.41
Olympia, WA MSA	45	3.57	0.00	0.00	12.34	8.89	68.09	53.33	19.57	37.78	0.82	0.00	0.00	0.63	1.90
Portland, WA MSA	98	7.78	0.28	0.00	21.71	15.31	44.82	37.76	33.20	46.94	1.27	0.00	1.36	1.03	1.49
Spokane, WA MSA	115	9.13	0.50	0.00	10.96	6.96	63.09	63.48	25.46	29.57	2.67	0.00	0.00	2.42	4.04
Wenatchee-East Wenatchee, WA MSA	22	1.75	0.00	0.00	18.55	27.27	54.40	40.91	27.04	31.82	1.37	0.00	2.78	1.24	1.05
Yakima, WA MSA	40	3.17	1.43	2.50	22.04	22.50	38.95	30.00	37.58	45.00	2.80	20.00	4.26	3.16	1.64
Non-Metro WA	130	10.32	0.08	0.00	11.26	6.15	70.75	60.77	17.91	33.08	3.20	0.00	1.87	2.46	5.79
<b>State Total</b>	<b>1,260</b>	<b>100.00</b>	<b>0.57</b>	<b>0.56</b>	<b>14.29</b>	<b>10.00</b>	<b>59.08</b>	<b>57.86</b>	<b>26.06</b>	<b>31.59</b>	<b>3.62</b>	<b>2.38</b>	<b>2.00</b>	<b>3.69</b>	<b>4.15</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Washington								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	23,914	52.79	0.49	0.46	15.58	10.55	55.45	54.43	28.48	34.57	6.61	4.97	5.42	6.72	6.90
<b>Limited Review:</b>															
Bellingham, WA MSA	1,938	4.28	0.00	0.00	8.83	7.95	71.28	68.16	19.90	23.89	8.89	0.00	7.37	8.90	9.43
Bremerton-Silverdale, WA MSA	2,518	5.56	1.75	1.43	9.31	6.91	69.62	67.39	19.32	24.27	9.00	8.65	6.91	8.97	9.83
Kennewick-Pasco-Richland, WA MSA	849	1.87	2.95	1.65	13.08	4.71	55.11	50.06	28.86	43.58	4.29	2.33	2.24	4.42	4.53
Longview, WA MSA	538	1.19	2.18	1.49	10.31	5.39	66.32	67.10	21.20	26.02	5.39	3.39	4.39	5.01	6.97
Lombard-Verona-Anacortes, WA MSA	852	1.88	0.00	0.00	9.11	5.05	71.16	70.31	19.73	24.65	6.78	0.00	3.88	6.88	7.36
Olympia, WA MSA	1,504	3.32	0.00	0.00	12.34	8.11	68.09	65.89	19.57	26.00	4.29	0.00	3.57	4.28	4.60
Portland, OR MSA	2,415	5.33	0.28	0.33	21.71	12.92	44.82	39.67	33.20	47.08	4.34	4.71	3.63	4.15	4.78
Spokane, WA MSA	4,957	10.94	0.50	0.22	10.96	6.44	63.09	58.38	25.46	34.96	5.56	6.38	3.72	5.28	6.56
Wenatchee-East Wenatchee, WA MSA	637	1.41	0.00	0.00	18.55	14.91	54.40	53.06	27.04	32.03	5.55	0.00	5.59	5.46	5.68
Yakima, WA MSA	783	1.73	1.43	0.89	22.04	9.58	38.95	34.36	37.58	55.17	6.37	0.00	3.98	5.83	7.22
Non-Metro WA	4,392	9.70	0.08	0.25	11.26	6.67	70.75	62.66	17.91	30.42	6.86	9.38	5.87	6.50	7.98
<b>State Total</b>	<b>45,297</b>	<b>100.00</b>	<b>0.57</b>	<b>0.45</b>	<b>14.29</b>	<b>9.22</b>	<b>59.08</b>	<b>56.56</b>	<b>26.06</b>	<b>33.76</b>	<b>6.31</b>	<b>5.43</b>	<b>5.02</b>	<b>6.34</b>	<b>6.71</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all refinance loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY			Geography: Washington								Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	522	66.41	3.72	2.49	36.96	41.00	43.29	41.57	16.04	14.94	2.77	0.00	2.25	2.78	4.35
<b>Limited Review:</b>															
<del>Bellevue, WA MSA</del>	34	4.33	0.00	0.00	27.18	52.94	62.25	38.24	10.58	8.82	3.57	0.00	0.00	6.67	0.00
Bremerton-Silverdale, WA MSA	16	2.04	9.25	0.00	28.01	31.25	54.98	56.25	7.76	12.50	0.00	0.00	0.00	0.00	0.00
Kennewick-Pasco-Richland, WA MSA	4	0.51	18.46	0.00	22.92	0.00	45.18	75.00	13.44	25.00	0.00	0.00	0.00	0.00	0.00
<del>Longview, WA MSA</del>	11	1.40	0.64	0.00	42.57	18.18	55.16	72.73	1.62	9.09	0.00	0.00	0.00	0.00	0.00
Lombard-Verona-Anacortes, WA MSA	8	1.02	0.00	0.00	13.16	25.00	84.67	75.00	2.16	0.00	0.00	0.00	0.00	0.00	0.00
Olympia, WA MSA	20	2.54	0.00	0.00	31.69	35.00	66.41	60.00	1.90	5.00	0.00	0.00	0.00	0.00	0.00
<del>Port Townsend, WA MSA</del>	21	2.67	9.33	9.52	54.66	47.62	25.88	38.10	10.14	4.76	0.00	0.00	0.00	0.00	0.00
Spokane, WA MSA	112	14.25	8.47	8.93	29.99	32.14	52.41	46.43	9.13	12.50	1.12	16.67	0.00	0.00	0.00
Wenatchee-East Wenatchee, WA MSA	5	0.64	0.00	0.00	38.67	20.00	51.29	80.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00
Yakima, WA MSA	3	0.38	15.70	33.33	38.09	0.00	29.23	66.67	16.99	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro WA	30	3.82	9.55	3.33	20.39	20.00	62.18	56.67	7.88	20.00	3.03	0.00	0.00	4.76	0.00
<b>State Total</b>	<b>786</b>	<b>100.00</b>	<b>5.34</b>	<b>3.44</b>	<b>35.38</b>	<b>38.30</b>	<b>45.95</b>	<b>44.66</b>	<b>13.33</b>	<b>13.61</b>	<b>1.99</b>	<b>3.85</b>	<b>1.22</b>	<b>2.25</b>	<b>2.11</b>

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census  
 \* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.  
 \*\* Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by the number of multi-family housing units in the area based on the 2000 Census.  
 \*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Washington						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	2,126	61.89	2.42	2.35	23.07	21.54	47.99	50.00	26.53	26.11	0.29	0.22	0.30	0.30	0.28
<b>Limited Review:</b>															
Bellingham, WA MSA	86	2.50	0.00	0.00	12.27	15.12	74.51	67.44	13.22	17.44	0.05	0.00	0.39	0.00	0.00
Bremerton-Silverdale, WA MSA	136	3.96	3.29	2.21	10.98	5.88	62.87	65.44	22.85	26.47	0.15	0.00	0.00	0.15	0.20
Kennewick-Pasco-Richland, WA MSA	88	2.56	4.09	7.95	21.45	18.18	47.52	40.91	26.94	32.95	0.16	1.25	0.00	0.21	0.10
Longview, WA MSA	16	0.47	1.44	0.00	21.79	25.00	64.77	56.25	11.99	18.75	0.18	0.00	0.00	0.14	0.60
Longview-Verona-Anacortes, WA MSA	29	0.84	0.00	0.00	17.87	13.79	66.04	68.97	16.09	17.24	0.09	0.00	0.00	0.14	0.00
Olympia, WA MSA	61	1.78	0.00	0.00	21.44	16.39	64.29	63.93	14.27	19.67	0.03	0.00	0.00	0.05	0.00
Portland, WA MSA	297	8.65	3.81	4.38	35.79	31.99	36.01	36.03	24.40	27.61	0.38	0.69	0.51	0.38	0.18
Spokane, WA MSA	270	7.86	1.73	1.11	20.62	18.89	55.54	55.56	22.11	24.44	0.20	0.00	0.28	0.19	0.16
Wenatchee-East Wenatchee, WA MSA	36	1.05	0.00	0.00	23.66	27.78	57.60	50.00	18.74	22.22	0.37	0.00	0.60	0.25	0.43
Yakima, WA MSA	61	1.78	9.99	18.03	22.12	9.84	37.63	45.90	30.26	26.23	0.07	0.00	0.40	0.00	0.00
Non-Metro WA	229	6.67	0.50	0.00	14.47	9.17	69.54	77.73	15.48	13.10	0.22	0.00	0.39	0.21	0.15
<b>State Total</b>	<b>3,435</b>	<b>100.00</b>	<b>2.21</b>	<b>2.53</b>	<b>21.57</b>	<b>20.26</b>	<b>53.17</b>	<b>52.26</b>	<b>23.05</b>	<b>24.95</b>	<b>0.24</b>	<b>0.26</b>	<b>0.31</b>	<b>0.23</b>	<b>0.22</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Washington						Evaluation Period: September 26, 2008 to December 31, 2010						
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
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	4	44.44	1.01	0.00	16.58	0.00	58.49	75.00	23.92	25.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bellingham, WA MSA	1	11.11	0.00	0.00	5.06	0.00	89.07	100.00	5.87	0.00	0.55	0.00	0.00	0.59	0.00
Bremerton-Silverdale, WA MSA	0	0.00	0.92	0.00	5.34	0.00	67.22	0.00	26.52	0.00	0.00	0.00	0.00	0.00	0.00
Kennewick-Pasco-Richland, WA MSA	0	0.00	0.68	0.00	21.56	0.00	65.37	0.00	12.39	0.00	0.00	0.00	0.00	0.00	0.00
Longview, WA MSA	0	0.00	1.81	0.00	15.38	0.00	59.73	0.00	23.08	0.00	0.00	0.00	0.00	0.00	0.00
Longview-Verona-Anacortes, WA MSA	0	0.00	0.00	0.00	7.94	0.00	60.90	0.00	31.16	0.00	0.00	0.00	0.00	0.00	0.00
Olympia, WA MSA	0	0.00	0.00	0.00	17.80	0.00	65.85	0.00	16.35	0.00	0.00	0.00	0.00	0.00	0.00
Portland, OR MSA	1	11.11	0.19	0.00	16.37	0.00	46.42	100.00	37.02	0.00	0.00	0.00	0.00	0.00	0.00
Spokane, WA MSA	1	11.11	1.03	0.00	12.48	0.00	62.00	0.00	24.48	100.00	0.00	0.00	0.00	0.00	0.00
Wenatchee-East Wenatchee, WA MSA	0	0.00	0.00	0.00	16.80	0.00	59.82	0.00	23.38	0.00	0.00	0.00	0.00	0.00	0.00
Yakima, WA MSA	0	0.00	1.27	0.00	10.30	0.00	69.03	0.00	19.40	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro WA	2	22.22	0.27	0.00	14.65	0.00	72.76	100.00	12.32	0.00	0.09	0.00	0.00	0.12	0.00
<b>State Total</b>	<b>9</b>	<b>100.00</b>	<b>0.60</b>	<b>0.00</b>	<b>14.41</b>	<b>0.00</b>	<b>65.50</b>	<b>77.78</b>	<b>19.49</b>	<b>22.22</b>	<b>0.09</b>	<b>0.00</b>	<b>0.00</b>	<b>0.12</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: Washington										Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Seattle-Bellevue-Everett, WA MD	6,192	45.30	18.50	6.79	18.70	25.71	24.54	27.54	38.26	39.95	3.47	3.13	3.29	3.35	3.77	
<b>Limited Review:</b>																
Bellingham, WA MSA	675	4.94	18.16	6.02	18.66	23.78	23.94	34.10	39.24	36.10	6.50	7.01	5.78	7.09	6.35	
Bremerton-Silverdale, WA MSA	825	6.04	17.45	5.16	19.02	34.03	24.52	33.27	39.02	27.53	5.36	3.76	5.68	5.70	5.02	
Kennewick-Pasco-Richland, WA MSA	382	2.79	20.23	7.86	18.40	30.57	21.76	32.75	39.61	28.82	1.43	0.82	1.57	1.66	1.36	
Longview, WA MSA	168	1.23	20.36	7.27	17.47	32.73	23.64	30.91	38.53	29.09	4.68	5.48	5.42	4.15	4.30	
Longview/Verona-Anacortes, WA MSA	272	1.99	18.11	5.33	18.93	26.04	23.36	33.73	39.60	34.91	4.43	0.00	5.72	3.14	5.06	
Olympia, WA MSA	523	3.83	17.26	5.18	18.90	29.45	25.85	38.19	37.98	27.18	3.08	2.86	3.17	3.32	2.78	
Port Angeles, WA MSA	688	5.03	18.88	10.35	18.97	30.05	22.97	29.55	39.18	30.05	2.36	2.01	2.39	2.44	2.39	
Spokane, WA MSA	1,793	13.12	18.66	5.17	18.89	30.12	23.23	36.36	39.22	28.34	3.98	3.34	4.15	4.44	3.48	
Wenatchee-East Wenatchee, WA MSA	168	1.23	19.86	4.30	19.12	22.58	21.01	35.48	40.01	37.63	2.64	0.00	2.79	3.57	2.26	
Yakima, WA MSA	335	2.45	20.45	5.03	18.68	24.62	20.51	29.65	40.36	40.70	3.08	1.70	3.03	3.43	3.11	
Non-Metro WA	1,649	12.06	19.44	5.79	18.39	27.10	22.95	32.02	39.22	35.08	3.65	3.43	3.97	3.55	3.61	
<b>State Total</b>	<b>13,670</b>	<b>100.00</b>	<b>18.76</b>	<b>6.35</b>	<b>18.70</b>	<b>27.51</b>	<b>23.71</b>	<b>30.98</b>	<b>38.83</b>	<b>35.16</b>	<b>3.50</b>	<b>2.83</b>	<b>3.48</b>	<b>3.61</b>	<b>3.57</b>	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all Home Purchase loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 42.2% of loans originated and purchased by bank.



**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: Washington								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	582	46.19	18.50	6.75	18.70	21.83	24.54	32.94	38.26	38.49	4.68	4.96	4.97	4.88	4.30
<b>Limited Review:</b>															
Bellevue, WA MSA	66	5.24	18.16	12.20	18.66	17.07	23.94	19.51	39.24	51.22	7.75	17.24	3.85	4.46	9.94
Bremerton-Silverdale, WA MSA	112	8.89	17.45	4.35	19.02	24.64	24.52	31.88	39.02	39.13	8.44	5.41	14.10	8.28	7.08
Kennewick-Pasco-Richland, WA MSA	15	1.19	20.23	25.00	18.40	0.00	21.76	50.00	39.61	25.00	0.25	0.00	0.00	0.99	0.00
Longview, WA MSA	16	1.27	20.36	0.00	17.47	12.50	23.64	50.00	38.53	37.50	3.95	0.00	3.03	6.12	3.66
Longview/Vancouver-Macortes, WA MSA	19	1.51	18.11	25.00	18.93	0.00	23.36	33.33	39.60	41.67	5.10	16.67	0.00	5.97	4.44
Olympia, WA MSA	45	3.57	17.26	0.00	18.90	25.00	25.85	33.33	37.98	41.67	0.84	0.00	3.75	0.00	0.46
Spokane, WA MSA	98	7.78	18.88	13.33	18.97	20.00	22.97	23.33	39.18	43.33	1.31	2.13	0.84	1.22	1.44
Spokane, WA MSA	115	9.13	18.66	6.52	18.89	13.04	23.23	28.26	39.22	52.17	2.76	4.23	2.20	2.56	2.88
Wenatchee-East Wenatchee, WA MSA	22	1.75	19.86	12.50	19.12	12.50	21.01	12.50	40.01	62.50	1.40	0.00	2.94	0.00	1.70
Yakima, WA MSA	40	3.17	20.45	0.00	18.68	0.00	20.51	20.00	40.36	80.00	2.85	0.00	0.00	0.88	4.78
Non-Metro WA	130	10.32	19.44	8.06	18.39	14.52	22.95	27.42	39.22	50.00	3.33	3.75	3.21	3.66	3.15
State Total	1,260	100.00	18.76	7.51	18.70	18.78	23.71	30.05	38.83	43.65	3.65	4.36	3.80	3.56	3.52

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all Home Improvement loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 55.6% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Washington								Evaluation Period: September 26, 2008 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	23,914	52.79	18.50	6.63	18.70	18.40	24.54	27.79	38.26	47.17	7.25	7.91	8.09	6.94	7.06
<b>Limited Review:</b>															
Bellingham, WA MSA	1,938	4.28	18.16	5.21	18.66	18.01	23.94	27.11	39.24	49.67	10.40	11.97	10.49	9.93	10.50
Bremerton-Silverdale, WA MSA	2,518	5.56	17.45	5.14	19.02	18.33	24.52	29.28	39.02	47.25	10.86	11.31	12.30	10.30	10.66
Kennewick-Pasco-Richland, WA MSA	849	1.87	20.23	5.23	18.40	16.99	21.76	26.80	39.61	50.98	4.80	4.23	5.69	3.98	5.05
Longview, WA MSA	538	1.19	20.36	6.88	17.47	14.81	23.64	30.95	38.53	47.35	6.21	7.09	6.53	6.38	5.90
Longview/Verona/Anacortes, WA MSA	852	1.88	18.11	3.81	18.93	12.96	23.36	25.61	39.60	57.62	8.37	9.27	7.58	7.70	8.87
Olympia, WA MSA	1,504	3.32	17.26	5.02	18.90	15.50	25.85	28.60	37.98	50.87	4.76	5.29	4.08	4.65	5.04
Port Townsend, WA MSA	2,415	5.33	18.88	7.58	18.97	18.30	22.97	27.01	39.18	47.12	5.00	5.44	5.01	4.90	4.99
Spokane, WA MSA	4,957	10.94	18.66	5.02	18.89	16.21	23.23	28.50	39.22	50.28	6.61	6.15	6.59	6.64	6.64
Wenatchee-East Wenatchee, WA MSA	637	1.41	19.86	5.32	19.12	11.49	21.01	25.96	40.01	57.23	6.22	8.28	4.02	6.98	6.30
Yakima, WA MSA	783	1.73	20.45	4.51	18.68	11.01	20.51	27.80	40.36	56.68	6.99	8.28	6.16	7.30	6.97
Non-Metro WA	4,392	9.70	19.44	4.66	18.39	13.25	22.95	25.26	39.22	56.82	8.16	8.73	8.24	7.80	8.27
State Total	45,297	100.00	18.76	5.98	18.70	17.14	23.71	27.60	38.83	49.28	7.18	7.66	7.59	6.92	7.14

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 29.9% of loans originated and purchased by bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Washington			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	2,126	61.89	78.27	78.36	92.43	3.20	4.37	0.29	0.30
<b>Limited Review:</b>									
Bellingham, WA MSA	86	2.50	80.82	83.72	91.86	2.33	5.81	0.05	0.08
Bremerton-Silverdale, WA MSA	136	3.96	81.24	86.76	94.12	1.47	4.41	0.15	0.08
Kennewick-Pasco-Richland, WA MSA	88	2.56	76.62	76.14	90.91	7.95	1.14	0.16	0.33
Longview, WA MSA	16	0.47	79.43	62.50	93.75	0.00	6.25	0.18	0.00
Longview/Vernon/Macortes, WA MSA	29	0.84	78.87	65.52	86.21	6.90	6.90	0.09	0.00
Olympia, WA MSA	61	1.78	79.63	83.61	93.44	0.00	6.56	0.03	0.00
Port Townsend, WA MSA	297	8.65	76.91	80.47	93.27	1.35	5.39	0.38	0.26
Spokane, WA MSA	270	7.86	80.56	79.26	90.37	2.96	6.67	0.20	0.13
Wenatchee-East Wenatchee, WA MSA	36	1.05	78.72	63.89	97.22	0.00	2.78	0.37	0.26
Yakima, WA MSA	61	1.78	76.58	83.61	96.72	1.64	1.64	0.07	0.00
Non-Metro WA	229	6.67	79.72	81.66	95.20	3.93	0.87	0.22	0.16
State Total	3,435	100.00	78.80	79.10	92.63	3.00	4.37	0.24	0.22

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 8.24% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Washington			Evaluation Period: September 26, 2008 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	4	44.44	94.85	75.00	75.00	0.00	25.00	0.00	0.00
<b>Limited Review:</b>									
Bellingham, WA MSA	1	11.11	95.40	0.00	100.00	0.00	0.00	0.55	0.00
Bremerton-Silverdale, WA MSA	0	0.00	97.42	0.00	0.00	0.00	0.00	0.00	0.00
Kennewick-Pasco-Richland, WA MSA	0	0.00	90.93	0.00	0.00	0.00	0.00	0.00	0.00
Longview, WA MSA	0	0.00	95.93	0.00	0.00	0.00	0.00	0.00	0.00
Longview/Vernon-Anacortes, WA MSA	0	0.00	92.46	0.00	0.00	0.00	0.00	0.00	0.00
Olympia, WA MSA	0	0.00	95.22	0.00	0.00	0.00	0.00	0.00	0.00
Port Angeles, WA MSA	1	11.11	96.28	0.00	100.00	0.00	0.00	0.00	0.00
Spokane, WA MSA	1	11.11	94.91	100.00	100.00	0.00	0.00	0.00	0.00
Wenatchee-East Wenatchee, WA MSA	0	0.00	94.44	0.00	0.00	0.00	0.00	0.00	0.00
Yakima, WA MSA	0	0.00	89.97	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro WA	2	22.22	96.15	0.00	100.00	0.00	0.00	0.09	0.00
<b>State Total</b>	<b>9</b>	<b>100.00</b>	<b>94.73</b>	<b>44.44</b>	<b>88.89</b>	<b>0.00</b>	<b>11.11</b>	<b>0.09</b>	<b>0.00</b>

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 44.44% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Washington				September 26, 2008 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	80	16,197	200	98,484	280	114,681	69.50%	3	7,874
<b>Limited Review:</b>									
Bellingham, WA MSA	2	345	3	796	5	1,141	0.69%	0	0
Bremerton-Silverdale, WA MSA	11	1,979	3	5,037	14	7,016	4.25%	0	0
Kennewick-Richland-Pasco, WA MSA	0	0	1	40	1	40	0.02%	0	0
Longview, WA MSA	0	0	0	0	0	0	0.00%	0	0
Mount Vernon-Anacortes, WA MSA	0	0	1	2,744	1	2,744	1.66%	0	0
Olympia, WA MSA	0	0	0	0	0	0	0.00%	0	0
Spokane, WA MSA	11	2,436	17	7,627	28	10,063	6.10%	0	0
Tacoma, WA MD	4	4,787	6	7,788	10	12,575	7.62%	0	0
Wenatchee-East Wenatchee, WA MSA	1	157	0	0	1	157	0.10%	0	0
Yakima, WA MSA	4	297	3	1,195	7	1,492	0.90%	0	0
Non-Metro - Washington	12	877	8	14,221	20	15,098	9.15%	0	0
<b>State Total</b>	<b>125</b>	<b>27,075</b>	<b>242</b>	<b>137,932</b>	<b>367</b>	<b>165,007</b>	<b>100.00%</b>	<b>3</b>	<b>7,874</b>
Statewide Investments with Potential to Benefit one or more AAs	1	132	19	9,940	20	10,072	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	0	0	0	0	N/A	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Washington																	
Evaluation Period: September 26, 2008 to December 31, 2010																	
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
<b>Full Review:</b>																	
Seattle-Bellevue-Everett, WA	68.14	104	57.78	2.88	30.77	46.15	20.19	2	0	0	1	1	0	1.93	21.89	52.39	23.79
<b>Limited Review:</b>																	
Bellingham, WA MSA	2.06	4	2.22	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	13.44	70.37	16.19
Bremerton-Silverdale, WA MSA	3.35	7	3.89	14.29	0.00	71.43	14.29	0	0	0	0	0	0	3.15	16.39	63.80	16.66
Kennewick-Pasco-Richland, WA MSA	1.33	5	2.78	0.00	0.00	60.00	40.00	1	0	0	0	0	1	6.87	18.55	51.89	22.69
Longview, WA MSA	0.74	2	1.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	4.85	16.59	61.75	16.81
Mount Vernon-Anacortes, WA MSA	0.53	2	1.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.71	74.25	16.04
Olympia, WA MSA	1.74	4	2.22	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	15.50	68.02	16.48
Spokane, WA MSA	5.87	13	7.22	0.00	38.46	46.15	15.38	0	0	0	0	0	0	1.61	30.19	40.90	27.30
Tacoma, WA MSA	6.86	16	8.89	0.00	18.75	56.25	25.00	1	0	0	1	0	0	2.73	18.13	58.48	20.44
Wenatchee-East Wenatchee, WA MSA	0.96	3	1.67	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	24.88	52.36	22.75
Yakima, WA MSA	1.63	4	2.22	25.00	0.00	25.00	50.00	0	0	0	0	0	0	3.68	29.57	38.98	27.77
Non-Metro WA	6.78	16	8.89	0.00	18.75	56.25	25.00	1	0	0	0	0	1	1.17	15.81	67.26	15.76
<b>State Total</b>	<b>100.00</b>	<b>180</b>	<b>100.00</b>	<b>2.78</b>	<b>25.00</b>	<b>51.67</b>	<b>20.56</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2.06</b>	<b>20.48</b>	<b>55.79</b>	<b>21.65</b>

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

\*\* For this state rating area, 175 of the branches are a result of the bank's purchase of certain assets and liabilities of the former Washington Mutual from the FDIC.

**Table 1. Lending Volume**

Lending Volume		West Virginia						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Charleston, WV MSA	41.58	2,299	301,230	216	51,576	0	0	15	22,063	2,530	374,869	34.67
<b>Limited Review:</b>												
Huntington-Ashland, WV-KY-OH MSA	19.13	1,002	113,551	157	26,857	1	9	4	5,600	1,164	146,017	19.18
Non-Metro WV	39.29	2,178	244,370	211	26,184	2	493	0	0	2,391	271,047	46.14
<b>State Total</b>	<b>100.00</b>	<b>5,479</b>	<b>659,151</b>	<b>584</b>	<b>104,617</b>	<b>3</b>	<b>502</b>	<b>19</b>	<b>27,663</b>	<b>6,085</b>	<b>791,933</b>	<b>100.00</b>
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	0	0	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>														
Charleston, WV MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	34.67
<b>Limited Review:</b>														
Huntington-Ashland, WV-KY-OH MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19.18
Non-Metro WV	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	46.14
State Total	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

\* Deposit data as of June 30, 2010.



**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	895	45.57	1.33	0.34	20.15	7.26	55.84	56.76	22.67	35.64	9.15	7.14	3.73	11.93	7.10
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	385	19.60	0.25	0.52	19.22	10.13	55.81	54.29	24.72	35.06	7.61	0.00	4.63	8.40	7.39
Non-Metro WV	684	34.83	0.00	0.00	3.47	2.92	80.80	76.75	15.73	20.32	8.25	0.00	4.26	9.01	6.71
State Total	1,964	100.00	0.64	0.25	13.88	6.31	64.96	63.24	20.52	30.19	8.56	4.17	4.00	10.16	7.07

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	38	31.93	1.33	0.00	20.15	10.53	55.84	55.26	22.67	34.21	0.14	0.00	0.00	0.26	0.00
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	35	29.41	0.25	0.00	19.22	17.14	55.81	60.00	24.72	22.86	0.66	0.00	0.00	1.14	0.00
Non-Metro WV	46	38.66	0.00	0.00	3.47	0.00	80.80	80.43	15.73	19.57	0.93	0.00	0.00	1.01	0.80
State Total	119	100.00	0.64	0.00	13.88	8.40	64.96	66.39	20.52	25.21	0.51	0.00	0.00	0.73	0.25

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	1,363	40.21	1.33	0.22	20.15	9.98	55.84	52.02	22.67	37.78	7.49	4.55	7.00	7.09	8.17
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	579	17.08	0.25	0.69	19.22	10.02	55.81	58.03	24.72	31.26	7.58	0.00	7.45	8.05	6.90
Non-Metro WV	1,448	42.71	0.00	0.00	3.47	2.28	80.80	77.56	15.73	20.17	9.02	0.00	5.56	10.16	6.68
State Total	3,390	100.00	0.64	0.21	13.88	6.70	64.96	63.95	20.52	29.14	7.96	2.86	6.96	8.37	7.54

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all refinance loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	3	50.00	6.83	0.00	14.24	66.67	44.85	0.00	34.08	33.33	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	3	50.00	22.34	33.33	23.18	0.00	24.07	33.33	30.40	33.33	0.00	0.00	0.00	0.00	0.00
Non-Metro WV	0	0.00	0.00	0.00	6.69	0.00	77.34	0.00	15.97	0.00	0.00	0.00	0.00	0.00	0.00
State Total	6	100.00	9.75	16.67	14.99	33.33	46.98	16.67	28.28	33.33	0.00	0.00	0.00	0.00	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\* Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by the number of multi-family housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Charleston, WV MSA	216	36.99	11.35	17.13	16.96	18.06	46.87	37.50	24.81	27.31	0.68	1.69	1.27	0.37	0.60
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	157	26.88	13.16	24.84	17.26	14.65	43.50	39.49	26.08	21.02	0.59	0.77	0.25	0.85	0.32
Non-Metro WV	211	36.13	0.00	0.00	7.70	5.21	71.23	64.93	21.07	29.86	0.53	0.00	1.11	0.51	0.41
State Total	584	100.00	7.68	13.01	13.74	12.50	54.86	47.95	23.73	26.54	0.61	1.36	0.98	0.50	0.49

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Charleston, WV MSA	0	0.00	3.70	0.00	11.48	0.00	62.96	0.00	21.85	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	1	33.33	0.00	0.00	12.34	0.00	67.53	100.00	20.13	0.00	12.50	0.00	0.00	14.29	0.00
Non-Metro WV	2	66.67	0.00	0.00	3.40	0.00	74.15	100.00	22.45	0.00	0.00	0.00	0.00	0.00	0.00
State Total	3	100.00	1.39	0.00	8.36	0.00	68.52	100.00	21.73	0.00	1.32	0.00	0.00	1.64	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	895	45.57	21.80	7.89	17.65	23.28	20.13	31.81	40.41	37.02	8.49	12.06	9.67	11.10	5.43
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	385	19.60	22.95	5.11	17.81	19.89	20.14	34.14	39.11	40.86	7.92	3.90	9.73	11.29	5.46
Non-Metro WV	684	34.83	21.10	3.44	17.14	15.02	19.33	23.32	42.43	58.22	8.35	5.45	9.18	8.51	8.27
<b>State Total</b>	<b>1,964</b>	<b>100.00</b>	<b>21.77</b>	<b>5.73</b>	<b>17.50</b>	<b>19.64</b>	<b>19.84</b>	<b>29.27</b>	<b>40.89</b>	<b>45.35</b>	<b>8.33</b>	<b>9.06</b>	<b>9.58</b>	<b>10.44</b>	<b>6.47</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all Home Purchase loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.5% of loans originated and purchased by bank.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	38	31.93	21.80	11.11	17.65	16.67	20.13	33.33	40.41	38.89	0.14	0.00	0.69	0.00	0.00
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	35	29.41	22.95	8.57	17.81	14.29	20.14	37.14	39.11	40.00	0.69	0.00	0.00	2.86	0.00
Non-Metro WV	46	38.66	21.10	16.28	17.14	23.26	19.33	23.26	42.43	37.21	0.95	0.00	0.00	1.63	1.01
State Total	119	100.00	21.77	12.28	17.50	18.42	19.84	30.70	40.89	38.60	0.53	0.00	0.39	1.12	0.39

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all Home Improvement loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.2% of loans originated and purchased by bank.



**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: West Virginia								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston, WV MSA	1,363	40.21	21.80	5.85	17.65	14.58	20.13	26.52	40.41	53.05	8.00	8.90	8.39	9.24	7.32
<b>Limited Review:</b>															
Huntington-Ashland, WV-KY-OH MSA	579	17.08	22.95	6.70	17.81	14.75	20.14	25.48	39.11	53.07	8.37	3.16	7.58	8.35	9.06
Non-Metro WV	1,448	42.71	21.10	4.53	17.14	14.84	19.33	23.37	42.43	57.27	10.09	6.58	12.66	12.03	9.35
<b>State Total</b>	<b>3,390</b>	<b>100.00</b>	<b>21.77</b>	<b>5.42</b>	<b>17.50</b>	<b>14.72</b>	<b>19.84</b>	<b>24.97</b>	<b>40.89</b>	<b>54.90</b>	<b>8.68</b>	<b>7.13</b>	<b>9.14</b>	<b>9.76</b>	<b>8.33</b>

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 9.0% of loans originated and purchased by bank.

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: West Virginia			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Charleston, WV MSA	216	36.99	68.52	37.04	52.78	18.06	29.17	0.68	0.65
<b>Limited Review:</b>									
Huntington-Ashland, WV-KY-OH MSA	157	26.88	69.23	50.32	67.52	10.83	21.66	0.59	0.21
Non-Metro WV	211	36.13	66.29	43.13	67.77	20.85	11.37	0.53	0.76
State Total	584	100.00	67.86	42.81	62.16	17.12	20.72	0.61	0.61

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 15.75% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: West Virginia			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Charleston, WV MSA	0	0.00	98.15	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Huntington-Ashland, WV-KY-OH MSA	1	33.33	96.10	0.00	100.00	0.00	0.00	12.50	0.00
Non-Metro WV	2	66.67	97.96	100.00	50.00	0.00	50.00	0.00	0.00
State Total	3	100.00	97.63	66.67	66.67	0.00	33.33	1.32	0.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 33.33% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: West Virginia				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Charleston, WV MSA	3	196	18	4,746	21	4,942	45.09%	0	0
<b>Limited Review:</b>									
Huntington-Ashland, WV-KY-OH MSA	4	631	14	2,449	18	3,080	28.10%	0	0
Non-Metro - West Virginia	6	1,323	5	1,616	11	2,939	26.81%	0	0
State Total	13	2,150	37	8,811	50	10,961	100.00%	0	0
Statewide Investments with Potential to Benefit one or more AAs	12	807	13	3,173	25	3,980	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	0	0	0	0	0	0	N/A	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: West Virginia																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Charleston, WV MSA	34.67	11	39.29	18.18	9.09	36.36	36.36	0	0	0	0	0	0	1.70	21.15	54.97	22.19
<b>Limited Review:</b>																	
Huntington-Ashland, WV-KY-OH MSA	19.18	6	21.43	16.67	0.00	66.67	16.67	0	0	0	0	0	0	3.89	21.82	51.12	23.18
Non-Metro WV	46.14	11	39.29	0.00	9.09	81.82	9.09	0	0	0	0	0	0	0.00	3.98	81.15	14.86
State Total	100.00	28	100.00	10.71	7.14	60.71	21.43	0	0	0	0	0	0	1.51	15.04	63.72	19.72

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1. Lending Volume**

Lending Volume		Wisconsin						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
<b>Full Review:</b>												
Milwaukee-Waukesha-West Allis, WI MSA	50.86	20,525	4,112,816	1,619	255,537	2	273	24	94,578	22,170	4,463,204	66.57
<b>Limited Review:</b>												
Appleton, WI MSA	4.68	1,767	267,504	245	33,985	25	3,858	3	1,009	2,040	306,356	5.74
Fond du Lac, WI MSA	1.62	621	85,247	82	6,826	1	35	1	945	705	93,053	0.87
Green Bay, WI MSA	7.48	2,877	423,389	374	59,206	5	346	3	6,300	3,259	489,241	4.50
Janesville, WI MSA	2.45	949	139,496	101	23,697	15	1,800	1	100	1,066	165,093	2.82
Madison, WI MSA	12.22	4,947	1,051,136	362	50,832	10	1,388	9	19,577	5,328	1,122,933	7.27
Monroe, WI MSA	3.09	1,124	160,645	208	36,236	14	1,720	0	0	1,346	198,601	2.61
Neenah, WI MSA	5.84	2,378	383,087	167	30,220	0	0	0	0	2,545	413,307	2.27
Racine, WI MSA	11.76	4,676	783,277	434	60,870	14	1,800	4	11,050	5,128	856,997	7.33
State Total	100.00	39,864	7,406,597	3,592	557,409	86	11,220	45	133,559	43,587	8,108,785	100.00
Statewide Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	18	250,468	0	0	N/A
Statewide Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	2	21,088	0	0	N/A

\* Deposit data as of June 30, 2010.

Table 1. Other Products

Lending Volume		Wisconsin										Evaluation Period: January 1, 2007 to December 31, 2010			
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other State Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*	
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)		
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	66.57	
<b>Limited Review:</b>															
Appleton, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	5.74	
Fond du Lac, WI MSA	0.32	1	10	1	10	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.87	
Green Bay, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4.50	
Janesville, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.82	
Janesville, WI MSA	99.68	2	3,153	2	3,153	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.27	
Madison, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.61	
Madison, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2.27	
Racine, WI MSA	0.00	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	7.33	
Racine, WI MSA	100.00	3	3,163	3	3,163	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100.00	
Statewide Other Loan Data with Potential to Benefit one or more AAs	N/A	6	184,800	6	184,800	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Statewide Other Loan Data with No Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	

\* Deposit data as of June 30, 2010.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	5,554	48.63	4.46	4.50	12.07	9.60	46.58	47.95	36.88	37.95	8.79	4.31	6.83	9.04	9.33
<b>Limited Review:</b>															
Appleton, WI MSA	455	3.98	0.00	0.00	5.28	6.15	81.28	76.48	13.44	17.36	2.91	0.00	2.06	3.23	1.98
Fond du Lac, WI MSA	194	1.70	0.00	0.00	0.00	0.00	92.04	92.27	7.96	7.73	4.12	0.00	0.00	4.01	5.56
Green Bay, WI MSA	707	6.19	0.00	0.00	9.55	5.66	65.96	68.46	24.49	25.88	3.99	0.00	3.64	4.14	3.73
Janesville, WI MSA	301	2.64	0.00	0.00	6.33	4.65	61.50	59.47	32.17	35.88	6.88	0.00	7.23	7.06	6.57
Madison, WI MSA	1,638	14.34	0.70	0.85	11.22	7.39	64.74	65.51	23.34	26.25	5.39	5.08	3.80	5.66	5.36
Monroe, WI MSA	273	2.39	0.00	0.00	5.18	3.30	74.00	69.96	20.82	26.74	2.74	0.00	0.00	2.68	3.65
Oshtemo, WI MSA	645	5.65	3.43	2.17	6.59	4.65	71.55	78.91	18.42	14.26	6.11	17.14	3.70	6.69	3.32
Racine, WI MSA	1,653	14.47	0.00	0.00	1.75	1.03	67.28	72.41	30.97	26.56	11.46	0.00	7.84	11.88	10.65
State Total	11,420	100.00	2.26	2.43	8.77	6.94	59.86	59.75	29.11	30.88	7.03	5.16	5.31	7.05	7.57

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data



**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	% of Owner Occ. Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	274	53.94	4.46	8.03	12.07	10.95	46.58	41.97	36.88	39.05	1.94	1.14	1.24	1.82	2.32
<b>Limited Review:</b>															
Appleton, WI MSA	23	4.53	0.00	0.00	5.28	0.00	81.28	73.91	13.44	26.09	0.26	0.00	0.00	0.34	0.00
Fond du Lac, WI MSA	5	0.98	0.00	0.00	0.00	0.00	92.04	80.00	7.96	20.00	0.00	0.00	0.00	0.00	0.00
Green Bay, WI MSA	20	3.94	0.00	0.00	9.55	5.00	65.96	80.00	24.49	15.00	0.24	0.00	0.00	0.37	0.00
Janesville, WI MSA	20	3.94	0.00	0.00	6.33	5.00	61.50	35.00	32.17	60.00	1.36	0.00	0.00	0.00	3.39
Madison, WI MSA	40	7.87	0.70	0.00	11.22	2.50	64.74	67.50	23.34	30.00	0.49	0.00	0.00	0.21	1.43
Monroe, WI MSA	10	1.97	0.00	0.00	5.18	0.00	74.00	90.00	20.82	10.00	0.20	0.00	0.00	0.26	0.00
Oshkosh, WI MSA	42	8.27	3.43	0.00	6.59	4.76	71.55	85.71	18.42	9.52	1.02	0.00	0.00	0.95	1.59
Racine, WI MSA	74	14.57	0.00	0.00	1.75	2.70	67.28	59.46	30.97	37.84	1.10	0.00	0.00	0.95	1.52
State Total	508	100.00	2.26	4.33	8.77	7.28	59.86	54.13	29.11	34.25	1.04	1.04	0.58	0.79	1.69

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 4. Geographic Distribution of Refinance Loans**

Geographic Distribution: REFINANCE		Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	% of Owner Occ. Units**	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	14,575	52.48	4.46	2.28	12.07	6.00	46.58	40.07	36.88	51.64	6.72	1.36	2.65	5.79	8.25
<b>Limited Review:</b>															
Appleton, WI MSA	1,287	4.63	0.00	0.00	5.28	4.12	81.28	74.51	13.44	21.37	3.02	0.00	2.22	3.05	3.02
Fond du Lac, WI MSA	421	1.52	0.00	0.00	0.00	0.00	92.04	90.02	7.96	9.98	2.81	0.00	0.00	2.80	2.84
Green Bay, WI MSA	2,147	7.73	0.00	0.00	9.55	5.40	65.96	63.95	24.49	30.65	3.70	0.00	2.91	3.58	4.04
Janesville, WI MSA	627	2.26	0.00	0.00	6.33	3.67	61.50	57.26	32.17	39.07	4.16	0.00	2.65	4.79	3.56
Madison, WI MSA	3,252	11.71	0.70	0.49	11.22	8.86	64.74	61.96	23.34	28.69	3.15	4.63	3.43	2.91	3.56
Monroe, WI MSA	840	3.02	0.00	0.00	5.18	4.29	74.00	69.40	20.82	26.31	3.07	0.00	2.03	2.94	3.52
Oshtemo, WI MSA	1,682	6.06	3.43	1.78	6.59	4.28	71.55	71.34	18.42	22.59	5.05	2.10	3.70	4.91	5.91
Racine, WI MSA	2,944	10.60	0.00	0.00	1.75	1.77	67.28	59.51	30.97	38.72	4.91	0.00	4.07	4.46	5.75
State Total	27,775	100.00	2.26	1.36	8.77	5.45	59.86	52.06	29.11	41.12	4.94	1.68	2.95	4.23	6.35

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all refinance loans originated and purchased in the rated area.

\*\* Percentage of owner occupied units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 5. Geographic Distribution of Multi-Family Loans**

Geographic Distribution: MULTI-FAMILY		Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Multi-Family Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography***				
	#	% of Total*	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	% of Multi-family Units **	% Bank Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	122	75.78	12.61	13.93	19.46	22.95	48.14	38.52	19.79	24.59	0.40	2.94	0.00	0.00	0.00
<b>Limited Review:</b>															
Appleton, WI MSA	2	1.24	0.00	0.00	9.38	50.00	79.78	50.00	10.84	0.00	0.00	0.00	0.00	0.00	0.00
Fond du Lac, WI MSA	1	0.62	0.00	0.00	0.00	0.00	97.56	100.00	2.44	0.00	0.00	0.00	0.00	0.00	0.00
Green Bay, WI MSA	3	1.86	0.00	0.00	22.93	0.00	69.00	66.67	8.07	33.33	2.70	0.00	0.00	4.17	0.00
Janesville, WI MSA	1	0.62	0.00	0.00	14.68	0.00	54.21	0.00	31.11	100.00	0.00	0.00	0.00	0.00	0.00
Madison, WI MSA	17	10.56	16.23	17.65	19.37	23.53	48.55	47.06	15.85	11.76	1.49	0.00	0.00	2.99	0.00
Monroe, WI MSA	1	0.62	0.00	0.00	8.86	0.00	76.30	100.00	14.84	0.00	0.00	0.00	0.00	0.00	0.00
Oshtemo, WI MSA	9	5.59	3.26	11.11	24.26	33.33	57.04	55.56	15.44	0.00	0.00	0.00	0.00	0.00	0.00
Racine, WI MSA	5	3.11	0.00	0.00	0.14	0.00	83.94	100.00	15.92	0.00	0.00	0.00	0.00	0.00	0.00
State Total	161	100.00	9.85	13.04	17.27	22.36	55.68	43.48	17.20	21.12	0.72	1.59	0.00	0.98	0.00

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

\*\* Percentage of multi-family units is the number of multi-family housing units in a particular geography divided by the number of multi-family housing units in the area based on the 2000 Census.

\*\*\* Based on 2009 Bank (affiliate purchases removed) vs. 2009 Aggregate HMDA Data

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: SMALL LOANS TO BUSINESSES			Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	1,611	44.96	7.44	4.53	13.12	10.74	43.08	42.64	35.77	42.09	0.93	1.16	1.05	0.93	0.89
<b>Limited Review:</b>															
Appleton, WI MSA	245	6.84	0.00	0.00	8.92	7.35	72.98	76.73	18.10	15.92	1.05	0.00	1.17	1.05	0.97
Fond du Lac, WI MSA	82	2.29	0.00	0.00	0.00	0.00	93.75	93.90	6.25	6.10	0.51	0.00	0.00	0.56	0.00
Green Bay, WI MSA	373	10.41	0.00	0.00	13.62	10.72	66.15	67.56	20.20	21.72	0.90	0.00	0.96	0.94	0.76
Janesville, WI MSA	101	2.82	0.00	0.00	12.37	8.91	52.12	59.41	35.51	31.68	1.32	0.00	0.55	2.01	0.75
Madison, WI MSA	362	10.10	4.37	1.38	11.70	16.30	61.87	62.71	22.06	19.61	0.63	0.30	1.02	0.63	0.48
Monroe, WI MSA	208	5.81	0.00	0.00	6.59	5.29	72.20	72.60	21.20	22.12	1.17	0.00	0.00	1.15	1.55
Oshkosh-Neenah, WI MSA	167	4.66	5.93	5.99	10.17	6.59	69.47	74.25	14.43	13.17	0.75	0.00	0.93	0.77	0.76
Racine, WI MSA	434	12.11	0.00	0.00	1.41	0.46	71.18	71.43	27.41	28.11	0.92	0.00	1.56	0.83	1.10
State Total	3,583	100.00	4.12	2.46	10.32	9.01	57.77	57.94	27.54	30.59	0.89	0.92	1.00	0.89	0.87

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: SMALL LOANS TO FARMS			Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010				
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
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	2	2.33	2.21	0.00	4.85	0.00	49.59	50.00	43.24	50.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Appleton, WI MSA	25	29.07	0.00	0.00	1.60	0.00	87.21	100.00	11.19	0.00	4.93	0.00	0.00	5.30	0.00
Fond du Lac, WI MSA	1	1.16	0.00	0.00	0.00	0.00	90.80	100.00	9.20	0.00	0.00	0.00	0.00	0.00	0.00
Green Bay, WI MSA	5	5.81	0.00	0.00	2.90	0.00	79.97	100.00	17.13	0.00	1.18	0.00	0.00	1.52	0.00
Janesville, WI MSA	15	17.44	0.00	0.00	4.45	0.00	54.25	73.33	41.30	26.67	2.47	0.00	0.00	6.06	0.00
Madison, WI MSA	10	11.63	0.78	0.00	3.99	0.00	74.12	70.00	21.11	30.00	0.75	0.00	0.00	0.00	5.88
Monroe, WI MSA	14	16.28	0.00	0.00	1.27	0.00	80.93	42.86	17.80	57.14	3.45	0.00	0.00	1.47	10.53
Racine, WI MSA	0	0.00	0.44	0.00	2.00	0.00	74.00	0.00	23.56	0.00	0.00	0.00	0.00	0.00	0.00
Non-Metro WI	14	16.28	0.00	0.00	1.12	0.00	63.58	92.86	35.31	7.14	0.55	0.00	0.00	0.76	0.00
State Total	86	100.00	0.59	0.00	2.57	0.00	68.68	80.23	28.14	19.77	0.99	0.00	0.00	1.05	0.83

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Based on 2009 Bank vs. 2009 Aggregate CRA Data

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	% of Families**	% Bank Loans***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	5,554	48.63	19.84	7.43	17.89	26.70	23.61	29.43	38.65	36.44	9.57	7.07	9.86	10.52	9.29
<b>Limited Review:</b>															
Appleton, WI MSA	455	3.98	13.60	16.02	19.72	29.37	30.53	26.94	36.14	27.67	2.26	2.66	1.80	1.91	3.09
Fond du Lac, WI MSA	194	1.70	14.43	9.88	18.74	41.28	31.55	27.33	35.27	21.51	3.58	3.41	3.85	5.45	1.46
Green Bay, WI MSA	707	6.19	15.64	12.37	18.07	25.34	26.77	27.15	39.52	35.14	3.85	4.17	3.42	3.61	4.56
Janesville, WI MSA	301	2.64	13.14	14.79	18.82	29.23	26.19	31.69	41.85	24.30	7.05	8.24	7.35	6.78	5.96
Madison, WI MSA	1,638	14.34	15.15	9.64	18.13	27.56	28.08	29.21	38.65	33.58	5.18	6.77	4.52	4.88	5.54
Mosinee, WI MSA	273	2.39	15.68	16.05	19.70	20.16	28.02	27.98	36.60	35.80	2.14	3.16	1.02	1.95	3.06
Oshtemo, WI MSA	645	5.65	17.83	12.15	18.46	32.11	25.73	26.29	37.98	29.45	6.17	7.89	5.59	6.75	5.59
Racine, WI MSA	1,653	14.47	12.73	8.16	16.64	26.79	25.79	31.91	44.85	33.14	9.21	7.77	11.24	9.00	8.25
State Total	11,420	100.00	17.07	9.21	18.06	27.32	25.70	29.30	39.18	34.17	7.00	5.96	6.82	7.40	7.24

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Purchase loans originated and purchased in the MA/AA as a percentage of all Home Purchase loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.9% of loans originated and purchased by bank.

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: Wisconsin								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****				
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Milwaukee-Waukesha-West Allis, WI MSA	274	53.94	19.84	7.02	17.89	20.61	23.61	27.19	38.65	45.18	2.03	1.21	2.10	1.00	2.92
<b>Limited Review:</b>															
Appleton, WI MSA	23	4.53	13.60	13.04	19.72	26.09	30.53	30.43	36.14	30.43	0.27	0.00	0.58	0.43	0.00
Fond du Lac, WI MSA	5	0.98	14.43	25.00	18.74	25.00	31.55	0.00	35.27	50.00	0.00	0.00	0.00	0.00	0.00
Green Bay, WI MSA	20	3.94	15.64	17.65	18.07	23.53	26.77	23.53	39.52	35.29	0.25	0.00	1.08	0.00	0.00
Janesville, WI MSA	20	3.94	13.14	5.26	18.82	10.53	26.19	47.37	41.85	36.84	1.38	0.00	2.86	0.00	1.59
Madison, WI MSA	40	7.87	15.15	13.79	18.13	20.69	28.08	17.24	38.65	48.28	0.50	0.00	0.64	0.24	0.70
Madison-Windsor, WI MSA	10	1.97	15.68	33.33	19.70	0.00	28.02	44.44	36.60	22.22	0.21	0.00	0.00	0.00	0.55
Omaha, NE MSA	42	8.27	17.83	9.09	18.46	27.27	25.73	27.27	37.98	36.36	1.10	0.00	0.00	3.13	0.90
Racine, WI MSA	74	14.57	12.73	10.77	16.64	13.85	25.79	24.62	44.85	50.77	1.14	1.39	0.61	1.17	1.30
State Total	508	100.00	17.07	9.60	18.06	19.67	25.70	27.17	39.18	43.56	1.08	0.59	1.10	0.70	1.46

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Home Improvement loans originated and purchased in the MA/AA as a percentage of all Home Improvement loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.9% of loans originated and purchased by bank.

**Table 10. Borrower Distribution of Refinance Loans**

Borrower Distribution: REFINANCE		Geography: Wisconsin										Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share****					
	#	% of Total*	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	% of Families **	% Bank Loans ***	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Milwaukee-Waukesha-West Allis, WI MSA	14,575	52.48	19.84	4.71	17.89	15.55	23.61	26.15	38.65	53.59	7.62	4.67	6.56	6.88	8.75	
<b>Limited Review:</b>																
Appleton, WI MSA	1,287	4.63	13.60	7.66	19.72	22.99	30.53	30.11	36.14	39.23	3.19	2.42	2.91	3.11	3.57	
Fond du Lac, WI MSA	421	1.52	14.43	6.70	18.74	24.13	31.55	28.15	35.27	41.02	2.98	2.56	3.06	2.52	3.36	
Green Bay, WI MSA	2,147	7.73	15.64	7.12	18.07	21.40	26.77	29.97	39.52	41.51	3.98	3.64	4.54	3.60	4.03	
Janesville, WI MSA	627	2.26	13.14	7.22	18.82	21.84	26.19	34.48	41.85	36.46	4.55	3.97	4.94	5.23	3.86	
Madison, WI MSA	3,252	11.71	15.15	6.85	18.13	21.49	28.08	28.69	38.65	42.98	3.46	3.62	3.64	3.22	3.53	
Monroe, WI MSA	840	3.02	15.68	8.39	19.70	25.04	28.02	27.50	36.60	39.07	3.37	3.58	3.55	2.74	3.66	
Port Washington, WI MSA	1,682	6.06	17.83	8.04	18.46	21.41	25.73	28.45	37.98	42.11	5.54	5.39	6.29	4.96	5.57	
Racine, WI MSA	2,944	10.60	12.73	4.68	16.64	15.05	25.79	28.77	44.85	51.50	5.34	5.72	5.54	5.48	5.16	
State Total	27,775	100.00	17.07	5.66	18.06	17.86	25.70	27.58	39.18	48.90	5.47	4.16	5.07	4.97	6.13	

State Total

Aggregate Data Source: 2009 Aggregate HMDA Data; Demographic Data Source: 2000 Census

\* Refinance loans originated and purchased in the MA/AA as a percentage of all Refinance loans originated and purchased in the rated area.

\*\* Percentage of Families is based on the 2000 Census.

\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.2% of loans originated and purchased by bank.



**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: Wisconsin			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Business Loans		Businesses With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total*	% of Businesses**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$1,000,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Milwaukee-Waukesha-West Allis, WI MSA	1,619	45.07	74.87	32.00	70.29	11.12	18.59	0.93	0.55
<b>Limited Review:</b>									
Appleton, WI MSA	245	6.82	76.59	25.71	74.69	7.35	17.96	1.05	0.78
Fond du Lac, WI MSA	82	2.28	78.25	34.15	85.37	4.88	9.76	0.51	0.49
Green Bay, WI MSA	374	10.41	76.78	18.72	69.25	13.37	17.38	0.90	0.25
Janesville, WI MSA	101	2.81	77.58	31.68	50.50	12.87	36.63	1.32	1.26
Madison, WI MSA	362	10.08	76.12	27.07	74.59	10.77	14.64	0.63	0.32
Monroe, WI MSA	208	5.79	76.52	19.23	69.23	8.65	22.12	1.17	0.48
Oshtemo, WI MSA	167	4.65	79.19	29.34	67.66	8.38	23.95	0.75	0.41
Racine, WI MSA	434	12.08	79.26	33.41	70.97	12.21	16.82	0.92	0.41
State Total	3,592	100.00	76.35	29.04	70.60	10.83	18.57	0.89	0.49

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to businesses with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to businesses.

No information was available for 36.72% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS		Geography: Wisconsin			Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	Total Small Farm Loans		Farms With Revenues of \$1 Million or Less***		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total*	% of Farms**	% Bank Loans	% of Loans \$100,000 or less	% of Loans >\$100,000 to \$250,000	% of Loans >\$250,000 to \$500,000	All	Rev. \$1 Million or less
<b>Full Review:</b>									
Milwaukee-Waukesha-West Allis, WI MSA	2	2.33	94.76	0.00	50.00	50.00	0.00	0.00	0.00
<b>Limited Review:</b>									
Appleton, WI MSA	25	29.07	96.95	80.00	52.00	36.00	12.00	4.93	5.77
Fond du Lac, WI MSA	1	1.16	97.39	0.00	100.00	0.00	0.00	0.00	0.00
Green Bay, WI MSA	5	5.81	97.24	100.00	80.00	20.00	0.00	1.18	2.22
Janesville, WI MSA	15	17.44	94.33	93.33	60.00	26.67	13.33	2.47	3.45
Madison, WI MSA	10	11.63	96.34	30.00	40.00	40.00	20.00	0.75	0.00
Monroe, WI MSA	14	16.28	96.82	92.86	64.29	21.43	14.29	3.45	2.90
Oshtemo, WI MSA	0	0.00	96.89	0.00	0.00	0.00	0.00	0.00	0.00
Racine, WI MSA	14	16.28	97.42	92.86	71.43	7.14	21.43	0.55	0.56
State Total	86	100.00	96.52	79.07	59.30	26.74	13.95	0.99	1.00

State Total

Aggregate Data Source: 2009 Aggregate CRA Data; Demographic Data Source: 2000 Census

\* 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.

\*\* Business and Farm Demographic Data Source: Dun and Bradstreet 2010

\*\*\* Small loans to farms with revenues of \$ 1 million or less as a percentage of all loans reported as small loans to farms.

No information was available for 5.81% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Wisconsin				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
<b>Full Review:</b>									
Milwaukee-Waukesha-West Allis, WI MSA	34	5,102	136	18,750	170	23,852	44.20%	5	17,101
<b>Limited Review:</b>									
Appleton, WI MSA	3	747	12	464	15	1,211	2.24%	0	0
Fond du Lac, WI MSA	3	230	6	1,915	9	2,145	3.97%	0	0
Green Bay, WI MSA	1	53	16	2,514	17	2,567	4.76%	1	7,853
Janesville, WI MSA	5	90	2	5	7	95	0.18%	0	0
Madison, WI MSA	9	3,854	19	16,100	28	19,954	36.97%	2	9,066
Oshkosh-Neenah, WI MSA	1	85	8	2,234	9	2,319	4.30%	0	0
Racine, WI MSA	2	299	4	27	6	326	0.60%	0	0
Non-Metro - Wisconsin	5	1,359	11	141	16	1,500	2.78%	1	2
<b>State Total</b>	63	11,819	214	42,150	277	53,969	100.00%	9	34,022
Statewide Investments with Potential to Benefit one or more AAs	23	2,033	14	923	37	2,956	N/A	0	0
Statewide Investments with no Potential to Benefit one or more AAs	1	121	3	36	4	157	N/A	0	0

\* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: Wisconsin																	
Evaluation Period: January 1, 2007 to December 31, 2010																	
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
<b>Full Review:</b>																	
Milwaukee-Waukesha-West Allis, WI MSA	66.57	30	40.54	13.33	13.33	36.67	36.67	0	0	0	0	0	0	11.87	16.37	42.27	29.29
<b>Limited Review:</b>																	
Appleton, WI MSA	5.74	7	9.46	0.00	28.57	57.14	14.29	0	0	0	0	0	0	0.00	6.90	80.83	12.27
Fond du Lac, WI MSA	0.87	2	2.70	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	92.18	7.82
Green Bay, WI MSA	4.50	7	9.46	0.00	28.57	57.14	14.29	0	0	0	0	0	0	0.00	14.43	63.65	21.06
Janesville, WI MSA	2.82	4	5.41	0.00	50.00	25.00	25.00	0	0	0	0	0	0	0.00	9.03	58.36	32.61
Madison, WI MSA	7.27	6	8.11	0.00	33.33	50.00	16.67	0	0	0	0	0	0	7.58	13.48	59.76	19.19
Oshkosh-Neenah, WI MSA	2.61	5	6.76	0.00	0.00	60.00	40.00	0	0	0	0	0	0	0.00	6.60	75.01	18.39
Racine, WI MSA	2.27	5	6.76	0.00	40.00	60.00	0.00	0	0	0	0	0	0	7.23	9.47	66.60	16.70
Non-Metro WI	7.33	8	10.81	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	1.25	70.63	28.13
<b>State Total</b>	<b>100.00</b>	<b>74</b>	<b>100.00</b>	<b>5.41</b>	<b>18.92</b>	<b>52.70</b>	<b>22.97</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6.88</b>	<b>11.95</b>	<b>56.51</b>	<b>24.51</b>

Demographic Data Source: 2000 Census

\* Rated area refers to either state or multistate MSA rating area.

**Table 1: Lending Volume**

Lending Volume		Broader Regional Area						Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Residential Loans		Small Loans to Businesses		Small Loans to Farms		Community Development Loans		Total Loans Reported		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
Broader Regional Area Loans with Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	72	697,038	72	697,038	N/A
Broader Regional Area Loans with no Potential to Benefit one or more AAs	N/A	0	0	0	0	0	0	122	392,238	122	392,238	N/A

Table 1: Other Products

Lending Volume		Broader Regional Area								Evaluation Period: January 1, 2007 to December 31, 2010				
MA/Assessment Area:	% of Loans (#) in MA/AA	Total Optional Loans		Other Loan Data		Home Equity		Motor Vehicle		Credit Card		Other Secured Consumer		% of Deposits in MA/AA*
		#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	#	\$ (000)	
Broader Regional Area Other Loan Data with Potential to Benefit one or more AAs	N/A	0	0	0	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Broader Regional Area Other Loan Data with No Potential to Benefit one or more AAs	N/A	8	243,629	8	243,629	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: Broader Regional Area				January 1, 2007 to December 31, 2010			
MA/Assessment Area:	Prior Period Investments*		Current Period Investments		Total Investments			Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	Evaluation Period	\$(000's)	% of Total	#	\$(000's)
Regional Investments with Potential to Benefit one or more AAs	580	192,521	477	604,905	1,057	797,426	N/A	13	26
Regional Investments with no Potential to Benefit one or more AAs	53	80,972	465	363,480	518	444,452	N/A	35	42,151