



## **PUBLIC DISCLOSURE**

September 30, 2012

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Wells Fargo Bank, National Association  
Charter Number: 1

101 North Phillips Avenue  
Sioux Falls, South Dakota 57104

Office of the Comptroller of the Currency

Large Bank Supervision  
Constitution Center  
400 7th Street SW  
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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

### General Information and Overall CRA Rating

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 (low- and moderate-income) neighborhoods, consistent with the safe and sound operation of the institution. Upon conclusion of such assessment, 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 Wells Fargo Bank, National Association (WFB) issued by the OCC, the institution's supervisory agency, for the evaluation period starting November 13, 2009 to November 13, 2012. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 25.

**Institution's CRA Rating:** This institution is rated **Needs to Improve**.

The following table indicates the performance level of WFB with respect to the Lending, Investment, and Service Tests:

Performance Levels	Wells Fargo Bank, National Association Performance Tests		
	Lending Test*	Investment Test	Service Test
<b>Outstanding</b>	X	X	
<b>High Satisfactory</b>			X
<b>Low Satisfactory</b>			
<b>Needs to Improve</b>			
<b>Substantial Noncompliance</b>			

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

The major factors that support this rating include the following:

### **Fair Lending and Other Illegal Credit Practices**

- The bank's overall CRA Performance Evaluation rating was lowered from "Outstanding" to "Needs to Improve" as a result of the extent and egregious nature of the evidence of discriminatory and illegal credit practices, as described in the Fair Lending and Other Illegal Credit Practices section of this document.
- The findings reflect an extensive and pervasive pattern and practice of violations across multiple lines of business within the bank, resulting in significant harm to large numbers of consumers. The bank failed to implement an effective compliance risk management program designed to properly prevent, identify and correct violations. Further, bank management instituted policies, procedures and performance standards that contributed to several of the violations for which evidence has been identified.

### **Lending Test**

- WFB demonstrated lending levels that reflected excellent responsiveness to the credit needs in the majority of assessment areas (AAs). In the majority of AAs, WFB's market share, as measured by its ranking or percentage, generally exceeded the ranking or percentage market share of deposits.
- WFB's geographic distribution and distribution by income of the borrower or revenue of the farm or business has been generally good. Although there were some AAs where performance was excellent, other AAs showed only adequate performance.
- WFB's volume and nature of community development (CD) lending had a significantly positive influence on the Lending Test performance. CD lending had a significantly positive influence on 24 of the 54 rating areas and a positive influence on 12 of the 54 rating areas.

### **Investment Test**

- WFB's performance, as measured primarily by volume of investments, was excellent in 35 of the 54 rating areas.
- Community contacts indicated that WFB was particularly responsive to the identified CD needs in many of its AAs.

- WFB is a leader in providing Equity Equivalent Investments (EQ2). Although a small percentage of total investments, the EQ2 is a significant source of capital for many CD organizations.

### **Service Test**

- In the majority of WFB's rating areas, WFB's retail delivery systems, including branches and ATMs, are readily accessible to all portions of the bank's AAs.
- WFB's opening and closing of branches generally has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.
- In 16 of WFB's rating areas, the bank is considered a leader in providing CD services. However, in most rating areas, CD services were relatively high or adequate.

## Definitions and Common Abbreviations

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

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

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

**Census Tract (CT):** Small, relatively permanent statistical subdivisions of a county delineated by local participants as part of the U.S. Census Bureau's Participant Statistical Areas Program. The primary purpose of CTs is to provide a stable set of geographic units for the presentation of decennial census data. CTs generally have between 1,500 and 8,000 people, with an optimum size of 4,000 people.

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

**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 U.S. 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, the disposition of the application (e.g., approved, denied, and withdrawn), loan pricing, the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

**Median Family Income (MFI):** The median income derived from the U.S. Census Bureau's American Community Survey data every 5 years and used to determine the income level category of geographies. In addition, it is the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level of individuals within a geography. For any given geography, 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 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

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

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

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

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

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

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

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

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

**Tier One Capital (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 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.

## Description of Institution

Wells Fargo Bank, National Association (WFB), is an interstate financial institution headquartered in Sioux Falls, South Dakota. WFB conducts business within 54 AAs located in 39 states and 15 multistate MSAs. WFB is a wholly-owned subsidiary of Wells Fargo & Company (WFC) headquartered in San Francisco, California. WFC is a diversified financial services company providing banking, insurance, investments, mortgage loans, and consumer finance largely through WFB. Based on asset size, WFC is the fourth largest bank holding company in the United States.

As of September 30, 2012, WFB had total assets of \$1.2 trillion, deposits of \$953 billion and total loans of \$761 billion. Approximately 59 percent of the bank's loan portfolio is comprised of real estate loans, predominately loans secured by 1-4 family residential properties. Commercial and industrial loans comprise 20 percent of the loan portfolio, and loans to individuals for household, family, and personal purposes comprise 12 percent of the portfolio. WFB has a Tier 1 Capital base of \$96 billion.

At the request of WFB and in accordance with provisions of the CRA, this evaluation considers affiliate activities.

WFB is a full service bank with 6,194 branches and 12,241 ATMs. The bank offers a complete line of diversified financial products and services to consumers and businesses centered in retail and business banking, mortgage banking, trust services, and investment management. The bank's business strategy focuses on retail and wholesale banking with an emphasis on mortgage, small business, and CD lending. The bank, through its Wells Fargo Home Mortgage division, provides mortgage services to all 50 states through more than 718 mortgage stores, the WFB branch network, and the Internet.

WFB was rated "**Outstanding**" at the previous CRA evaluation dated September 30, 2008.

## **Scope of the Evaluation**

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

The evaluation considers home mortgage loan products (home purchase, home improvement, home refinance, and multifamily, where applicable), small loans to businesses and small loans to farms, retail services, and qualified CD lending, investments and services. Conclusions drawn on home mortgage products, and small loans to businesses and farms are based upon bank performance during calendar years 2008 through 2011. At the bank's request, retail services, CD activities of the bank, other bank subsidiaries, and affiliates reflect performance through December 31, 2012. Please refer to Appendix A for a detailed listing of products, entities included in the review, and evaluation periods by state or multistate MSA.

### **Data Integrity**

Prior to this examination, we tested the accuracy of the bank's HMDA and CRA lending data. We also reviewed the appropriateness of CD activities provided for consideration in our evaluation. This included the testing of CD loans, investments, and services for accuracy and to determine if they qualify as CD.

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

Each multistate metropolitan area where the bank has offices received a full-scope review.

In each state where the bank has a branch, a sample of AAs within that state was selected for full-scope reviews. The full-scope AAs in each state represent a substantial majority of each states lending and deposit activity. Refer to the "Scope" section under each State and multistate Metropolitan Area Rating section for details regarding how the areas were selected.

### **Ratings**

The bank's overall rating is a blend of the multistate metropolitan area ratings and state ratings.

The state ratings are based on those AAs that received full-scope reviews. Refer to the "Scope" section under each State Rating section for details regarding how the AAs were weighted in arriving at the respective ratings.

## Fair Lending or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. 25.28(c) and 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau (CFPB).

We also considered other material practices WFB engaged in during the evaluation period involving home mortgage lending practices and foreclosure issues that provide relevant context for the Bank's activities during the period of the CRA evaluation.

The following evidence of discriminatory or other illegal credit practices adversely affected WFB's overall CRA Performance Rating:

- Evidence of noncompliance with the Fair Housing Act (FHA) and Equal Credit Opportunity Act (ECOA). The OCC determined it had reason to believe that, from 2004 through 2008, WFB engaged in a pattern or practice of discrimination on the basis of race or color in violation of the FHA and ECOA and referred the matter to the U.S. Department of Justice (DOJ). In July 2012, DOJ and WFB entered a consent order that provided \$125 million in compensation for African American and Hispanic wholesale borrowers who were steered into subprime mortgage loans and who paid higher fees and rates than white borrowers. WFB also agreed to provide \$50 million in direct down payment assistance to borrowers in communities around the country where DOJ identified large numbers of discrimination victims and which were hard hit by the housing crisis. In addition, WFB agreed to conduct a review to determine whether there were African-American and/or Hispanic borrowers who received subprime Wells Fargo loans from the Bank's retail channel. Based on its review, the Bank agreed to provide an additional \$59.3 million in compensation to African-American and Hispanic retail subprime borrowers. For further information on the consent agreement, please refer to DOJ Consent Order 1:12-cv-01150, filed July 12, 2012, and Notice Regarding Additional Monetary Relief 1:12-cv-01150-JDB, filed December 19, 2012.
- Evidence of unfair or deceptive acts or practices, in violation of section 5 of the Federal Trade Commission Act (FTC Act), by bank employees at the Bank's now

defunct affiliate, Wells Fargo Financial, Inc., concerning the steering of potential prime borrowers into more costly subprime loans and falsifying income information in mortgage applications between January 2004 and June 2008. In the previous CRA performance evaluation, dated September 30, 2008, which covered that period, WFB opted to have the OCC consider loans originated by its affiliate, Wells Fargo Financial. Wells Fargo & Company and Wells Fargo Financial, Inc. entered into a consent cease and desist order with the Board of Governors of the Federal Reserve System (Board) and agreed to compensate affected borrowers and pay an \$85 million civil money penalty (CMP). For further information, see the Board's Order to Cease and Desist and Order of Assessment of a Civil Money Penalty Issued Upon Consent, Docket Nos. 11- 094-B-HC1, 11-094-I-HC1, 11-094-B-HC2, and 11-094-I-HC2, July 20, 2011.

- Evidence of unfair and abusive practices, in violation of the Consumer Financial Protection Act (CFPA), by Bank employees when they, without customers' authorizations, opened deposit accounts and transferred funds into them from authorized accounts, applied for credit card accounts, issued and activated debit cards, and created email addresses to enroll consumers in online-banking services. In a consent order with the CFPB, WFB agreed to pay full restitution to all victims and a \$100 million CMP. The City and County of Los Angeles brought a related action under California Business and Professions Code sections 17200 *et seq.* and required restitution to harmed customers, prospective relief, as well as a total penalty of \$50 million payable to the City and County. The OCC also brought a related action in which it assessed a \$35 million CMP and ordered restitution to harmed customers for the Bank's unsafe and unsound sales practices. For further information, please refer to the CFPB consent order, 2016- CFPB-0015, filed September 8, 2016; *People v. Wells Fargo & Co.*, case no. BC580778, [Proposed] Stipulated Final Judgment, dated September 1, 2016, available at <http://www.lacityattorney.org/allegations-against-wells-fargo>; and OCC enforcement actions nos. 2016-077 and 2016-079, both dated September 6, 2016.
- Evidence of noncompliance with the Servicemembers Civil Relief Act (SCRA). On February 9, 2015, DOJ announced that under its National Mortgage Settlement (NMS), Wells Fargo agreed to pay over \$28 million to 239 service members and their co-borrowers for non-judicial foreclosures that violated the SCRA. For further information, refer to DOJ's news release, <http://www.justice.gov/opa/pr/service-members-receive-over-123-million-unlawful-foreclosures-under-servicemembers-civil>, and the NMS consent agreement with DOJ, 1112-cv-00361-RMC, filed April 4, 2012.
- Evidence of noncompliance with the SCRA. On September 29, 2016, DOJ and OCC entered into related consent agreements with WFB. The consent order with DOJ resolved allegations that WFB violated the SCRA by repossessing 413 motor

vehicles owned by SCRA-protected servicemembers without first obtaining court orders from at least January 1, 2008 through July 1, 2015. The consent order with the OCC resolved findings that, between approximately 2006 and 2016, WFB violated three separate provisions of the SCRA. WFB failed to (i) apply the six percent interest rate cap to servicemember obligations and liabilities; (ii) accurately disclose servicemembers' military status to the court via affidavits filed in eviction proceedings; and (iii) obtain court orders prior to repossessing servicemembers' automobiles. WFB agreed to pay appropriate compensation to servicemembers, including over \$4.1 million for its improper vehicle repossessions. Additionally, WFB agreed to pay DOJ a \$60,000 CMP and OCC a \$20 million CMP. WFB self-identified these violations, disclosed them to the regulatory agencies, and began corrective action prior to issuance of the consent orders. For further information, refer to DOJ's consent order, 2:16-cv-07336, filed September 29, 2016, and OCC's enforcement actions nos. 2016-081 and 2016-082, both dated September 29, 2016.

- Evidence of unfair or deceptive acts or practices, in violation of section 5 of the FTC Act, in connection with debt cancellation products sold to the Bank's consumer credit cardholders from 2006 to 2013. The OCC found that the Bank unfairly imposed recurring late fees on customer's when debt cancellation benefit payments were posted to the account after the minimum payment due date and also deceptively billed customers for the full debt cancellation product fee while marketing a "risk-free" 30-day review period in which the Bank would credit fees if the customer cancelled within the review period. The OCC also found that the Bank engaged in an unfair practice when it billed its credit customers for credit monitoring services they did not receive. The Bank has reimbursed harmed customers. For further information, see OCC enforcement action no. 2015-048, June 3, 2015.
- Evidence of unfair and deceptive practices, in violation of the CFPB, in the servicing of private student loans by WFB's Education Financial Services (EFS) division. In its consent order with WFB, the CFPB found that EFS allocated partial payments in a manner that unfairly maximized fees incurred by many consumers and provided billing statements that described how partial payments would be treated in a deceptive manner. WFB self-identified the violations, disclosed them to the regulatory agencies, and initiated corrective actions prior to the issuance of the consent order. WFB agreed to provide relief in the amount of \$410,000 to affected borrowers and pay a \$3.6 million CMP to the CFPB. For further information, refer to CFPB's consent order no. 2016-CFPB- 0013, filed August 22, 2016.
- Evidence of noncompliance with Section 8(a) of the Real Estate Settlement Procedures Act (RESPA). The Consumer Financial Protection Bureau (CFPB) found that, from 2008 through 2013, loan officers employed by the Bank

participated in a scheme involving the now defunct Genuine Title, LLC, to exchange marketing services for referrals of settlement-service business in connection with consumers' home-mortgage transactions in violation of RESPA. The Bank was required to pay \$10 million in total remediation to customers who may have been harmed and CMPs of \$21 million to the CFPB and \$3 million to the Consumer Protection Division of the State of Maryland's Office of the Attorney General. For further information, see CFPB consent order 2015-CFPB-0002, filed January 22, 2015.

- Evidence of noncompliance with the FHA involving allegations by the U.S. Department of Housing and Urban Development (HUD) that WFB d/b/a Wells Fargo Home Mortgage discriminated against women who were pregnant, or had recently given birth, and were on maternity leave between August 2011 and August 2012. For further information, see the HUD Conciliation Agreement No. 07-13-0213-8, October 8, 2014.
- Evidence of noncompliance with the FHA involving allegations by HUD that WFB engaged in differential treatment of "Real Estate Owned" (REO) properties in minority neighborhoods that had been hard hit by the foreclosure crisis. As part of the agreement, WFB committed to invest a total of \$39 million in 45 communities across the country through various programs. For further information, see the HUD Conciliation Agreement No. 00-13-0001-8, June 6, 2013.

The OCC does not have additional public information regarding non-compliance with statutes and regulations prohibiting discriminatory or other illegal credit practices with respect to this institution. In determining this institution's overall CRA rating, the OCC has considered information that was made available to the OCC on a confidential basis during its consultations.

These findings reflect an extensive and pervasive pattern and practice of discriminatory and illegal credit practices across multiple lines of business within the bank, resulting in significant harm to large numbers of consumers. The bank failed to implement an effective compliance risk management program designed to properly prevent, identify and correct violations. Further, bank management instituted policies, procedures and performance standards that contributed to the violations for which evidence has been identified. As a result of the significant extent and egregious nature of these findings, the CRA Performance Evaluation overall rating was lowered from "Outstanding" to "Needs to Improve."

The OCC will consider any evidence of discriminatory or other illegal credit practices relative to this institution with respect to the fair lending and consumer protection laws and regulations that other Federal regulators may provide to the us before the end of the institution's next performance evaluation in that subsequent evaluation even if the information provided concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## **Comments Applicable to All Rating Areas**

### **Lending Test**

#### **Lending Gap Analysis**

We performed a lending gap analysis to determine if there were significant clusters of census tracts with no lending or very low levels of lending. We identified census tracts where lending levels were below what would be expected given the economic conditions and demographic data for those tracts. Of the census tracts with lower than expected lending levels, we identified contiguous groups of low- and moderate-income census tracts and conducted additional review and analysis. After careful review and analysis which included consultation with OCC Community Affairs officers, we concluded that these contiguous low- and moderate-income tracts with lower than expected lending levels were a random occurrence and not evidence of willful neglect or denial of banking services on the part of WFB.

#### **Inside/Outside Ratio**

We analyzed the loans made inside and outside of WFB's combined AAs. We found that, in aggregate, a majority in number (88 percent) and amount (89 percent) were made within the bank's 54 AAs, located in 39 states and 15 multistate MSAs. Furthermore, a majority of HMDA loans and small business and farm loans were made inside the bank's combined AAs. Loans made by affiliates were not considered in this analysis.

### **Performance Context Factors**

Evaluating the CRA performance of Wells Fargo Bank requires examiners to rate and conclude on numerous performance criteria within three separate tests over 388 assessment areas, in 54 state and multistate rating areas.

We are required by the CRA to evaluate the bank's performance in the context of factors affecting the bank's ability to provide lending, investments, or services in its AAs. We are also required to document these performance context factors (PCF) in the performance evaluation. Although we are only required to consider complete PCF on AAs receiving a full review (also known as full scope AAs), this nonetheless involves identifying and documenting the effect of PCF in 92 full scope AAs across 54 state and multistate rating areas.

Promoting consistency and efficiency in evaluating a bank's CRA performance are primary objectives of the large bank CRA examination process. In addition, based on our experience with previous evaluations, we determined that performance context data

was either stale, irrelevant, or was not consistently available within each assessment area. We also determined that PCF were not consistently applied within each assessment area or the effect of a specific factor on the performance criteria was only anecdotal and the significance of the effect could not be quantified in a positive or negative way.

To ensure that our consideration of PCF in WFB's PE mitigated the key issues identified and achieved the primary objectives of the large bank CRA examination process,

- We developed a consistent and objective methodology to consider PCF across AAs in a way that was appropriate to different products and income levels of borrowers and geographies within the AA,
- We verified the effect of the PCF on the bank's ability to provide lending, investments, or services, and
- We only used PCF that could be supported by data that was reliable and consistently available in all AA.

In addition, to ensure that the performance evaluation was appropriately documented in the most efficient way possible without redundancy or overburdening the reader, we described in this section under each applicable performance criteria:

- The PCF affecting the performance criteria,
- The sources of economic or demographic data supporting the PCF,
- The methodology we used to assess the effect of the PCF on the performance criteria, and
- How the PCF and its effect on performance criteria would be documented in other sections of the performance evaluation.

Unless stated otherwise in the specific performance criteria section of the 54 state and multistate rating areas, conclusions that differ from what the data in the standardized tables might imply are due to the specific PCF data and methodology described below.

## **Lending Test**

### ***Lending Activity***

Per the Large Bank CRA Examiner Guidance (LBCRAEG), “the primary way an examiner put the lending volume (number or dollar) into perspective is by comparing the bank’s deposit market share in an AA to its market rank and market share in that AA for each loan product (number and dollar).”

To ensure consistency in our evaluation of lending activity, we used PCF from the same source and evaluated the data following the same methodology for each AA. We obtained bank deposit market share and ranking reports for each AA as of June 30, 2011 from the Federal Deposit Insurance Corporation Summary of Deposits website. Using reported HMDA data available on all institutions for each AA, we generated reports showing the market share percent and ranking for WFB’s home purchase, home refinance, and home improvement loans and small loans to business and farms. A separate market share and ranking report was generated for each loan product.

The first step in our evaluation was to calculate the ratio of loan market share for each loan category to the deposit market share. If the ratio was close to or exceeded 100 percent, we concluded that lending activity was excellent. Conclusions for ratios less than 100 percent were commensurate with the performance range applicable to the ratio.

After assessing our initial conclusion, we then reviewed the rankings of the bank’s loan and deposit market share relative to the loan and deposit market share of other banks in the AA. We compared the deposit market share ranking to the loan product market share ranking and evaluated whether comparison between rankings resulted in a conclusion similar to conclusions drawn using market share percentages. If the comparison of the ranking resulted in an improvement in our conclusions, the original conclusion was overridden.

Our conclusions on lending activity were based on the aggregate of the conclusions for all lending products. Our narrative describing the conclusion refers to the comparison of the deposit and loan product market share and rank. However, the comparison is initially based on the market share with an adjustment for ranking.

In a limited number of AAs, the market share or ranking was adjusted for the presence of a non-deposit taking lender with significant market share. In these cases, the issue was noted and the final conclusion was adjusted to reflect the effect of the lender’s market share on our evaluation of the bank.

## ***Geographic and Borrower Distribution of Home Purchase and Home Refinance Loans***

Because of the limited availability of reliable data and other resource constraints, we only used PCF in our evaluation of home purchase and home refinance loans in these performance criteria. We chose to focus our limited resources on these two products because their performance had the most effect on overall conclusions for these performance criteria.

We used three categories of PCF to evaluate these performance criteria. Each category is discussed separately due to the different types of data and methodologies used in our assessment.

### ***Category 1 - Economic and demographic data pertaining to the assessment area and the bank's ability to lend***

Negative economic factors can affect the demand for credit in an AA and therefore the bank's ability to lend in the AA. Similarly, certain demographic factors can reduce the likelihood that the population represented by the demographic comparator would be in the market for a specific loan product.

Through discussions with members of the OCC Economics Division and WFB personnel, we selected economic and demographic PCF factors that met the two primary criteria, previously identified:

1. The PCF had a verifiable effect on demand for credit from low- or moderate-income borrowers or geographies or the PCF had a verifiable effect on the demographic that we use to compare the bank's distribution of lending.
2. The data on these economic factors could be obtained from reliable sources in all of WFB's 92 full scope AAs.

The resulting PCF reflect a careful consideration of advantages and disadvantages of using certain data or methodologies relative to the overarching concern for ensuring relevant and accurate data applied consistently and efficiently across multiple products and AAs.

The PCF and sources of the PCF data that met our criteria are listed below:

- The percentage of families living in poverty compared to the percentage of low-income families in the AA (American Community Survey)
- The unemployment rate in the AA (American Community Survey)

- The affordability ratio (Median Home Value/Median Family Income - American Community Survey 2011 5 year estimate of the median home value divided by the HUD 2011 estimate of median family income)
- Households with housing cost burden - the percentage of households that are considered housing cost burdened (American Community Survey)
- The percentage of families living in poverty compared to the percentage of low-income families in the AA (American Community Survey)
- The percentage decline in home values from 2007-2011 in the AA as a ratio of the national rate of decline in home values (American Community Survey)
- Underwater mortgages - the percentage of home mortgages that are secured by homes valued at less than what the borrower owes the bank (CoreLogic)
- The percentage of homes in foreclosure as a percentage of all homes in the AA (Lender Processing Service)
- The percentage of families renting their homes in the AA (American Community Survey)

The following PCF were only used for certain performance criteria and products because the effect on the other products was not supported or the PCF did not apply to the demographic comparator:

- The affordability ratio and households with housing cost burden were only used for home purchase loans.
- Home value declines, underwater mortgages, and foreclosure rates were only used for home refinance loans.
- The percent of renting families was only used in our evaluation of WFB's distribution of home refinance loans to borrowers of different income levels. Because owner occupied homes is the comparator used to evaluate geographic distribution of home refinance loans, the percent of renting families does not affect our analysis.
- The percent of low-income families living at or below the poverty level is only considered in evaluating lending to low-income families or geographies. The poverty level would only affect the bank's ability to make loans to moderate-income families if the poverty level was within the range of moderate-income families. This level of poverty occurred in three of the 92 AAs. However, the

actual percentage of moderate-income families affected was minimal in two of the three. In the El Paso MSA, where the poverty level affected the moderate-income population, we considered this additional factor.

We determined the effect of the economic and demographic PCFs on our evaluation of performance by first assessing the degree to which each economic or demographic factor affected a specific AA. We did this by calculating the ratio of the PCF to the national average for that factor. We assessed a score based on the amount that the PCF negatively deviated from the national average. For example, if the ratio of the AA PCF to the PCF national average exceeded 100 percent, we assessed a score based on the percent above 100.

We then aggregated all the factors pertaining to a specific product or performance criteria in the AA and established a severity level based on the final score. We then adjusted the performance range for the specific product and performance criteria by a percent that correlated with the level of severity.

### *Category 2 – HMDA Applications*

This category of PCF consisted of HMDA reportable applications received by all lenders in an AA for a product regardless of action taken. The Interagency Questions and Answers Regarding Community Reinvestment specifically reference this data as a potential source of PCF when assessing the demand for a product within an AA. This PCF helps us understand the demand for a product relative to the assumed potential market indicated by the demographic comparator used in the specific performance criteria.

We identified situations where the demand for a product as indicated by the percent of all applications received from low- and moderate-income borrowers or geographies was significantly below the demographics. We then reviewed community contacts, market profiles, or complaints and determined if the difference in demand indicated by the applications received was a result of circumstances within the bank's control or evidence of red lining, discrimination, or other illegal credit practices.

In situations where there was no indication of these circumstances, we compared the percent of all industry applications received from low- and moderate-income borrowers and geographies to the percent of low- and moderate-income geographies and borrowers. If bank performance indicated that its level of lending to borrowers or geographies was better than the demand indicated by the applications, we considered adjusting the bank's performance to reflect this PCF.

### *Category 3 – Volume of Loans Relative to All Other Lenders*

In very specific circumstances, we determined it was beyond the capacity of the bank to originate a sufficient number of loans to achieve a level of acceptable performance in lending to low- and moderate-income borrowers or geographies.

In our evaluation, we identified AA where WFB was the number one ranked lender to low- or moderate-income borrowers or geographies, but its performance was below acceptable levels. However, in some of these AA, we also determined that the amount of loans that the bank needed to originate to achieve acceptable performance was significant as compared to the number of loans already originated by all other lenders in the AA during the same time. In these very specific circumstances, we concluded it was beyond the capacity of the bank to make sufficient loans without engaging in unsafe or unsound banking practices given the number of loans already originated by the bank and the total loans made by all lenders in the AA. Similar to the Category 2, we only adjusted our conclusions if there was no indication that this PCF was a result of circumstances within the bank's control or there was evidence of red lining, discrimination, or other illegal credit practices on the part of the bank.

#### *Documenting the PCF in Primary and Non- Primary Rating Areas*

We documented the PCF differently in primary versus non-primary rating areas. However, the effect of the PCF on these performance criteria was evaluated consistently for all full scope assessment areas.

In primary rating areas, if our initial conclusions were affected by one or more of the three PCF categories, we stated after the initial conclusion that our evaluation was affected by PCF and indicated which of the three categories affected the conclusion. We then stated our revised final conclusions for all income levels and product that were changed by the PCF.

In the primary rating area market profiles, we included a narrative discussion of the economic and demographic PCF affecting the geographic and borrower distribution performance criteria. We indicated the severity conclusion for each PCF based on the ratio of the specific factor to the national average. We then summarized the cumulative effect of these PCF as either moderately severe, severe, or extremely severe. If information on the second and third PCF categories affected the evaluation conclusions, we only identified these factors within the AA or rating area affected.

In non-primary rating areas, we simply indicated in the description of the institution and in the performance criteria conclusion narrative whether economic and demographic PCF, analysis of HMDA Applications, or analysis of the Volume of Loans Relative to All Other Lenders affected the geographic and borrower distribution conclusions overall or in a specific AA.

## ***Community Development Lending***

We considered the number and dollar volume of CD loans with emphasis placed on those loans that were particularly innovative, complex, or responsive to the needs of the AA. To ensure consistency in our consideration of PCF related to CD loans within the 92 full scope AAs across 54 state and multistate rating areas, we were required to develop a methodology to determine objectively and consistently how much additional consideration would be given to CD loans evidencing responsiveness, complexity, or innovation.

By definition, most if not all CD loans would be considered responsive to the needs of the AA. However, we identified CD loans that we considered particularly responsive to the needs of the AA because the bank demonstrated that the CD loan fulfilled a unique need in the community and was originated through discussions with local community groups. We gave extra credit to these CD loans and considered this in addition to the number and amount of all CD loans. We also applied the same methodology to loans showing characteristics of innovation and complexity. In assessment areas where we adjusted conclusions for these factors, we indicated the number of loans that we considered innovative, complex, or particularly responsive.

The merger of Wachovia Bank and WFB occurred midway into the evaluation period. As a result, the rating areas and AAs in this PE that were acquired solely through the merger (and did not overlap with existing WFB AAs and rating areas) were evaluated under a shorter evaluation period. To ensure a consistent and objective review of CD lending among the 92 full scope AAs across 54 state and multistate rating areas, we annualized the number and amount of CD loans to facilitate our evaluation. In rating areas where we adjusted CD lending conclusions for the shorter evaluation period, we indicated that the shorter evaluation period was considered in our conclusions.

## **Investment Test**

Similar to CD loans, we considered the number and dollar volume of CD investments with emphasis placed on those investments that were particularly innovative, complex, or responsive to the needs of the AA. However, unlike CD lending, responsiveness, innovation, and complexity were assessed as a separate performance criteria within the investment test with a separate conclusion stated. Therefore, negative conclusions on responsiveness could have a negative effect on the investment test conclusion.

As with CD loans, we identified investments that we considered particularly responsive to the needs of the AA because the bank demonstrated that the investment fulfilled a unique need in the community and was created through discussions with local community groups. We also identified investments that were innovative and complex. Our conclusion on responsiveness were based on the number and dollar volume of investments meeting the criteria for being particularly responsive, innovative, or

complex as a percentage of the total number and dollar volume of investments. Depending on the percentage, we concluded that responsiveness was either, excellent, good, adequate, poor, or very poor. Conclusions on the responsiveness of the investments in addition to the number and dollar amount of investments relative to the needs in the AA determined the overall conclusion for the investment test.

As was also the case with CD loans, we considered the shorter evaluation period for AAs added to WFB's performance evaluation through its merger with Wachovia Bank. To ensure a consistent and objective review of investments among the 92 full scope AAs across 54 state and multistate rating areas, we annualized the number and amount of investments to facilitate our evaluation.

### *Documentation in Primary and Non-Primary Rating Areas*

We documented investment test conclusions similarly in both primary and non-primary rating areas. We stated separate conclusions for responsiveness and identified the needs that were met by the investments. In rating areas where we adjusted investment conclusions for the shorter evaluation period, we indicated that the shorter evaluation period was considered in our conclusions.

## **Service Test**

### ***Branch Distribution***

#### *Bordering Branches*

We considered branches identified by WFB that bordered low- and moderate-income geographies and reportedly served the residents of these geographies. Through sampling, we verified that these branches were less than 1000 feet from the geographies and there were no barriers or other impediments that would prevent a resident of the low- and moderate-income geography from obtaining full use of the bordering branch's banking services. We considered bordering branches and branches within low- and moderate-income geographies equally in our evaluation.

#### *Bordering Branch Documentation in Primary and Non-Primary Rating Areas*

In both primary and non-primary ratings areas, we documented the effect of bordering branches in the same way. For each full scope AA, we first stated our initial branch distribution conclusion without considering the bordering branches. We then identified the number of bordering branches that we considered and stated the final conclusion after factoring in the bordering branches.

### ***Community Development Services***

The primary factor in this evaluation is the responsiveness of the CD services to the needs of the AA. However, it was difficult to evaluate fully the responsiveness of the CD services relative to the hours of CD services reported by the bank. Responsiveness was a factor identified by the bank. We found the bank's assessment to be very subjective and in the end was not consistent from one branch to the next. Our evaluation of CD services relied heavily on the hours of services relative to the bank's capacity to provide CD services in the AA (as measured by the number of branches within the AA and presumably the number of personnel available to provide CD services).

## PRIMARY RATING AREAS

Charlotte-Gastonia-Rock Hill, (North Carolina-South Carolina) Multistate MSA

Minneapolis-St. Paul-Bloomington, (Minnesota-Wisconsin) Multistate MSA

New York-Northern New Jersey, (New York-New Jersey-Pennsylvania) Multistate MSA

- Newark-Union, (New Jersey-Pennsylvania) MD
- New York-White Plains-Wayne, (New York-New Jersey) MD

Washington-Arlington-Alexandria, (District of Columbia-Virginia-Maryland) Multistate MSA

State of Arizona

- Phoenix-Mesa-Scottsdale MSA
- Tucson MSA

State of California

- Fresno MSA
- Los Angeles-Long Beach-Glendale MD
- Oakland-Fremont-Hayward MD
- Riverside-San Bernardino-Ontario MSA
- San Francisco-San Mateo-Redwood City MD
- Santa Ana-Anaheim-Irvine MD

State of Colorado

- Denver-Aurora-Broomfield MSA

State of Florida

- Fort Lauderdale-Pompano Beach-Deerfield Beach MD
- Miami-Miami Beach-Kendall MD
- Orlando-Kissimmee-Sanford MSA
- Tampa-St. Petersburg-Clearwater MSA
- West Palm Beach-Boca Raton-Boynton Beach MD

State of Georgia

- Atlanta-Sandy Springs-Marietta MSA

State of Nevada

- Las Vegas-Paradise MSA

State of New Jersey

- Edison-New Brunswick MSA

State of North Carolina

- Greensboro-High Point MSA
- Raleigh-Cary MSA
- Winston-Salem MSA
- Northwestern Non-Metro

State of Pennsylvania

- Philadelphia MD

State of Texas

- Austin-Round Rock-San Marcos MSA
- Dallas-Plano-Irving MD
- El Paso MSA
- Fort Worth-Arlington MD
- Houston-Sugar Land-Baytown MSA

State of Virginia

- Richmond MSA
- Virginia Beach-Norfolk-Newport News MSA

## **Charlotte-Gastonia-Rock Hill (North Carolina-South Carolina) Multistate MSA Rating**

### **CRA rating for the Multistate MSA<sup>1</sup>: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: Outstanding**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has a good level of qualified CD investments and grants within its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.

### **Description of Institution's Operations in the Charlotte-Gastonia-Rock Hill MSA**

Of the bank's 54 state and multistate rating areas, Charlotte-Gastonia-Rock Hill MSA ranks 9th and accounts for 3.0 percent of total bank deposits, or \$25.7 billion as of June 30, 2012. WFB has one defined AA in Charlotte-Gastonia-Rock Hill MSA, which include every county and MD in the multistate metropolitan area. Within the MSA, WFB operates 77 branches. WFB is the second largest banking institution in Charlotte-Gastonia-Rock Hill MSA with 12.9 percent of the deposit market share. Primary competitors include Bank of America, NA, and Branch Banking and Trust Company (BB&T) with deposit market shares of 78.4 percent and 2.4 percent, respectively.

It is estimated that about 44 percent of the deposits attributed to the bank in this MSA do not originate from WFB's operations within the MSA. We have taken the significant level of unaffiliated deposits into consideration when assessing the performance of WFB within the MSA and in assessing the contribution of the MSA rating to the overall bank rating. Without the unaffiliated deposits, we still consider the bank's operations within

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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.

the AA as significant and estimate that the MSA would be the fourteenth largest of the WFB's 54 rating areas.

Because WFB's branches in the Charlotte-Gastonia-Rock Hill MSA have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

Refer to the market profile for the Charlotte-Gastonia-Rock Hill MSA in Appendix C for detailed demographics and other performance context information.

## **LENDING TEST**

The bank's performance under the Lending Test in Charlotte-Gastonia-Rock Hill MSA is rated **High Satisfactory**.

### **Lending Activity**

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in Charlotte-Gastonia-Rock Hill MSA is excellent. WFB's lending activity in the Charlotte-Gastonia-Rock Hill MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

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

Geographic distribution of loans in Charlotte-Gastonia-Rock Hill MSA is good. We revised our conclusions to reflect performance context factors identified in the Charlotte-Gastonia-Rock Hill MSA. For more information, please refer to the discussion of performance for the specific product.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

WFB's distribution of home purchase loans by income level of the geography in the Charlotte-Gastonia-Rock Hill MSA is poor. Its distribution of home purchase loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the moderately severe economic and demographic conditions discussed in the Charlotte-Gastonia-Rock Hill MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home purchase loans by income level of the geography in the Charlotte-Gastonia-Rock Hill MSA was revised, and is now considered adequate as a result of these performance context factors.

WFB's distribution of home improvement loans by income level of the geography in the Charlotte-Gastonia-Rock Hill MSA is good. Its distribution of home improvement loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies significantly exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Charlotte-Gastonia-Rock Hill MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to moderately severe economic conditions discussed in the Charlotte-Gastonia-Rock Hill MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Charlotte-Gastonia-Rock Hill MSA was

revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

Refer to Table 6 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to businesses.

WFB’s geographic distribution of small loans to businesses by income level of the geography in the Charlotte-Gastonia-Rock Hill MSA is excellent. The bank’s distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank’s market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank’s distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank’s market share of small loans to businesses in moderate-income geographies is reasonably near to its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the Charlotte-Gastonia-Rock Hill MSA because the number of loans originated in the AA was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AA.

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

Distribution of loans by income level of the borrower in Charlotte-Gastonia-Rock Hill MSA is good.

### ***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

WFB’s borrower distribution of home purchase loans by income level of the borrower in the Charlotte-Gastonia-Rock Hill MSA is good. Its distribution of loans to low-income

borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to moderately severe economic and demographic conditions discussed in the Charlotte-Gastonia-Rock Hill MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of low- and moderate-income borrowers should be considered excellent for low-income borrowers. WFB's borrower distribution of home purchase loans by income level of the borrower in the Charlotte-Gastonia-Rock Hill MSA was revised and is now considered excellent as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Charlotte-Gastonia-Rock Hill MSA is good. Its distribution of home improvement loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is somewhat lower than its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Charlotte-Gastonia-Rock Hill MSA is adequate. Its distribution of home refinance loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Charlotte-Gastonia-Rock Hill MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to

businesses with gross annual revenue of \$1 million or less significantly exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to farms.

We did not assess borrower distribution of small loans to farms in the Charlotte-Gastonia-Rock Hill MSA because the number of loans originated in the AA was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AA.

### **CD Lending**

Refer to Table 1 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the bank’s level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The volume and nature of WFB’s CD lending had a significantly positive effect on Lending Test performance in the Charlotte-Gastonia-Rock Hill MSA. During the evaluation period, the bank originated 12 CD loans totaling \$63.3 million and equal to 2.2 percent of allocated Tier 1 Capital. We considered the shorter evaluation period for the Charlotte-Gastonia-Rock Hill MSA when assessing the effect of CD ending on performance.

Stating the level of CD loans as a percent of Tier 1 Capital allocated to the AA is somewhat misleading in the Charlotte-Gastonia-Rock Hill MSA due to the fact that Tier 1 Capital is allocated as a percentage of FDIC deposits associated with the AA. Because Charlotte, North Carolina is the former headquarters of Wachovia Bank, a significant volume of deposits are a result of corporate accounting and do not reflect consumer and commercial accounts in the Charlotte-Gastonia-Rock Hill MSA. Our assessment of CD lending performance considered the level of CD loans relative to the WFB’s operations serving the banking needs of the Charlotte-Gastonia-Rock Hill MSA.

Seventy-five percent of these loans were targeted to affordable housing and 25 percent to community services needs identified in the Charlotte-Gastonia-Rock Hill MSA. Thirty-three percent of WFB’s CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Charlotte-Gastonia-Rock Hill MSA include the following:

- In December 2010, WFB provided a \$3.2 million loan to finance a 168-unit affordable housing project located in Charlotte, North Carolina.
- In October 2011, WFB provided a \$300,000 line of credit for the purpose of providing working capital to a nonprofit affordable housing developer located in a moderate-income census tract in Charlotte, North Carolina. This nonprofit housing development and financial corporation is organized to expand affordable and well-maintained housing within stable neighborhoods for low- and moderate-income families in the city of Charlotte and Mecklenburg County.

## INVESTMENT TEST

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

WFB's Investment Test performance in Charlotte-Gastonia-Rock Hill MSA is rated **High Satisfactory**.

During the evaluation period, the bank made 160 grants and qualified investments totaling \$63 million or 2.2 percent of allocated Tier 1 Capital. The total included 140 grants and contributions worth \$7.7 million. WFB has nine ongoing qualified investments originated in prior periods that total \$20.6 million, are equal to 0.8 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

Stating the level of investments as a percent of Tier 1 Capital allocated to the AA is somewhat misleading in the Charlotte-Gastonia-Rock Hill MSA due to the fact that Tier 1 Capital is allocated as a percentage of FDIC deposits associated with the AA. Because Charlotte, North Carolina is the former headquarters for Wachovia Bank, a significant volume of deposits are a result of corporate accounting and do not reflect consumer and commercial accounts in the Charlotte-Gastonia-Rock Hill MSA. Our assessment of investment performance considered the level of grants and investments relative to the WFB's operations serving the banking needs of the Charlotte-Gastonia-Rock Hill MSA.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing, economic development, community services, and neighborhood revitalization and stabilization. Investments during the current evaluation period have created over 712 units of affordable housing in the Charlotte-Gastonia-Rock Hill MSA.

Examples of significant investments made in the Charlotte-Gastonia-Rock Hill MSA during the evaluation period include the following:

- WFB invested \$8.2 million to rehabilitate a 170 unit affordable housing project for low- and moderate-income seniors and households.
- In May 2010, WFB invested \$500,000 through an EQ2 in Grameen America. WFB's investment was used to help capitalize the loan fund in North Carolina. Grameen uses microfinancing to help low-income people improve their lives and move out of poverty. Grameen's activities include microlensing, financial education, establishment of credit history and personal savings.

## SERVICE TEST

The bank's performance under the Service Test in the Charlotte-Gastonia-Rock Hill MSA is rated **Outstanding**.

### Retail Banking Services

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.

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Charlotte-Gastonia-Rock Hill MSA is excellent.

In the Charlotte-Gastonia-Rock Hill MSA, delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is good. However, when considering 10 middle and upper income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves and is excellent in moderate-income geographies.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Charlotte-Gastonia-Rock Hill MSA is good and did not affect branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the AA resulting in a net loss of one branch in upper-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of the Charlotte-Gastonia-Rock Hill MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 25 percent of stores located in those geographies maintained Saturday hours, compared to 37 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in the Charlotte-Gastonia-Rock Hill MSA.

In the Charlotte-Gastonia-Rock Hill MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 743 hours of CD services. These hours represented 226 different CD service activities that benefited 95 different organizations and amounted to over three and a half hours of CD services per branch per year. Of the CD service activities, 12.4 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Charlotte-Gastonia-Rock Hill MSA include the following:

- A WFB employee serves on an advisory committee charged with reviewing and advising an affordable housing organization on programs and opportunities to support low-income families in the MSA.
- A WFB employee serves on the board of directors as treasurer for a CD qualified organization. As the treasurer, the employee provides financial expertise in the management of the organization's budget and fundraising efforts.

## **Minneapolis-St. Paul-Bloomington (Minnesota-Wisconsin) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: 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 the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of WFB's AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its AA.
- The distribution of WFB's borrowers reflects excellent penetration among retail customers of different income levels and business customers of different size within its AA.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.

### **Description of Institution's Operations in the Minneapolis-St. Paul-Bloomington MSA**

Of the bank's 54 state and multistate rating areas, Minneapolis-St. Paul-Bloomington MSA ranks second and accounts for 9.4 percent of total bank deposits, or \$79.4 billion as of June 30, 2012. WFB has one defined AA in the Minneapolis-St. Paul-Bloomington MSA, which includes all of the counties in the MSA. Within the MSA, WFB operates 101 branches. WFB is the largest banking institution in the Minneapolis-St. Paul-Bloomington MSA with 49.72 percent of the deposit market share. Primary competitors include US Bank, NA, and TCF Bank with deposit market shares of 27 percent and 3.2 percent, respectively. It is estimated that 75 percent of the deposits attributed to the bank in this MSA do not originate from WFB's operations within the MSA.

We have taken the significant level of unaffiliated deposits into consideration when assessing the performance of WFB within the MSA and in assessing the contribution of the MSA rating to the overall bank rating. Without the unaffiliated deposits, we still consider the bank's operations within the AA as significant and estimate that the MSA would be the tenth largest of the WFB's 54 rating areas.

Refer to the market profile for the Minneapolis-St. Paul-Bloomington MSA in Appendix C for detailed demographics and other performance context information.

## LENDING TEST

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the Minneapolis-St. Paul-Bloomington MSA is excellent.

WFB's lending activity in the Minneapolis-St. Paul-Bloomington MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

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

Geographic distribution of loans in Minneapolis-St. Paul-Bloomington MSA is good. We revised our conclusions to reflect performance context factors identified in the Minneapolis-St. Paul-Bloomington MSA. For more information, please refer to the discussion of performance for the specific AA.

#### *Home Mortgage Loans*

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

WFB's distribution of home purchase loans by income level of the geography in the Minneapolis-St. Paul-Bloomington MSA is excellent. Its distribution of home purchase loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies approximates the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Minneapolis-St. Paul-Bloomington MSA is adequate. Its distribution of home improvement loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income

geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is reasonably near its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Minneapolis-St. Paul-Bloomington MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Minneapolis-St. Paul-Bloomington MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Minneapolis-St. Paul-Bloomington MSA was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

Refer to Table 6 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

WFB's geographic distribution of small loans to businesses by income level of the geography in the Minneapolis-St. Paul-Bloomington MSA is adequate. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near to its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

We did not assess the geographic distribution of small loans to farms in the Minneapolis-St. Paul-Bloomington MSA because the number of loans originated in the AA was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AA.

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

Distribution of loans by income level of the borrower in the Minneapolis-St. Paul-Bloomington MSA is excellent.

### ***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

WFB's borrower distribution of home purchase loans by income level of the borrower in the Minneapolis-St. Paul-Bloomington MSA is excellent. Its distribution of loans to low-income borrowers exceeds the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers substantially meets its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Minneapolis-St. Paul-Bloomington MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Minneapolis-St. Paul-Bloomington MSA is good. Its distribution of home refinance loans to low-income borrowers is somewhat lower than the percent of low-income

families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Minneapolis-St. Paul-Bloomington MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

WFB's distribution of small loans to farms based on the revenue size of the farm in the Minneapolis-St. Paul-Bloomington MSA is good. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## **CD Lending**

Refer to Table 1 in the Minneapolis-St. Paul-Bloomington MSA section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The volume and nature of the bank's CD lending had a positive effect on performance in the Minneapolis-St. Paul-Bloomington MSA. During the evaluation period, the bank originated 74 CD loans totaling \$160.8 million and equal to 1.8 percent of allocated Tier 1 Capital. Stating the level of CD loans as a percent of Tier 1 Capital allocated to the

AA is somewhat misleading in the Minneapolis-St. Paul-Bloomington MSA due to the fact that Tier 1 Capital is allocated as a percentage of FDIC deposits associated with the AA. A significant volume of deposits are a result of corporate accounting and do not reflect consumer and commercial accounts in the Minneapolis-St. Paul-Bloomington MSA. Our assessment of CD lending performance considered the level of CD loans relative to the WFB's operations serving the banking needs of the Minneapolis-St. Paul-Bloomington MSA.

Thirty-four percent of these loans were targeted to affordable housing, 54 percent to community services, and 12 percent to economic development needs identified in the Minneapolis-St. Paul-Bloomington MSA. Sixteen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Minneapolis-St. Paul-Bloomington MSA include the following:

- In April 2012, WFB provided a \$10.5 million loan for the purpose of funding the construction of a 66-unit LIHTC affordable housing complex located in Savage, Minnesota. All 66 of the units are restricted to low- and moderate-income families or individuals. Additionally, tenants residing in these units will receive supportive services including case management designed to address barriers leading to long-term homelessness.
- In May 2012, WFB provided an \$8.6 million loan for the purpose of funding the construction of a 101-unit LIHTC affordable housing complex in Minneapolis, Minnesota. The development is intended to assist very-low-income adults who are experiencing long-term homelessness through a variety of tenant subsidy programs.

## INVESTMENT TEST

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

WFB's Investment Test performance in Minneapolis-St. Paul-Bloomington MSA is rated **Outstanding**.

During the evaluation period, the bank made 322 grants and qualified investments totaling \$119.7 million that are equal to 1.3 percent of allocated Tier 1 Capital. The total included 277 grants and contributions worth \$19.3 million. WFB has 79 ongoing qualified investments originated in prior periods that total \$89 million, are equal to one percent of allocated Tier 1 Capital, and provide continuing benefit to the community. Stating the level of CD investments as a percent of Tier 1 Capital allocated to the AA is somewhat misleading in the Minneapolis-St. Paul-Bloomington MSA due to the fact that

Tier 1 Capital is allocated as a percentage of FDIC deposits associated with the AA. A significant volume of deposits are a result of corporate accounting and do not reflect consumer and commercial accounts in the Minneapolis-St. Paul-Bloomington MSA. Our assessment of CD investment performance considered the level of CD investments relative to the WFB's operations serving the banking needs of the Minneapolis-St. Paul-Bloomington MSA.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing, economic development, community services, neighborhood revitalization and stabilization. Investments during the current evaluation period have created over 579 units of affordable housing in the Minneapolis-St. Paul-Bloomington MSA.

Examples of significant investments made in the Minneapolis-St. Paul-Bloomington MSA during the evaluation period include the following:

- In March 2009, WFB invested \$3 million through an EQ2 in an affordable housing fund. WFB's investment was used to help capitalize a subsidiary fund, which provides long-term, below-market interest rate loans to non-profit housing organizations. All projects are targeted to low- and moderate-income residents.
- In August 2012, WFB contributed \$7.2 million to NeighborWorks® America as part of WFB's NeighborhoodLIFT Down Payment Assistance Program and to fund NeighborWorks® America homeownership and foreclosure prevention activities in the MSA area. NeighborWorks® America is the country's preeminent leader in affordable housing and CD. The organization works to create opportunities for lower-income people to live in affordable homes in safe, sustainable neighborhoods that are healthy places for families to grow.

## SERVICE TEST

The bank's performance under the Service Test in the state of Minneapolis-St. Paul-Bloomington MSA is rated **Outstanding**.

## Retail Banking Services

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.

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Minneapolis-St. Paul-Bloomington MSA is excellent. Delivery systems are readily accessible to all portions of WFB's AA. The percentage distribution of branches in low- and moderate-income geographies approximates and exceeds respectively the percentage of the population residing in these geographies.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA. .

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Minneapolis-St. Paul-Bloomington MSA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB closed six branches throughout the AA resulting in a net loss of one branch in a low-income geography, two branches in moderate-income geographies, two branches in middle-income geographies, and one branch in an upper-income geography during the evaluation period. However, branch distribution after branch closings remained excellent.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Minneapolis-St. Paul-Bloomington MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 88 percent of branches located in those geographies maintained Saturday hours, compared to 94 percent of branches located in middle- and upper-income geographies.

### ***CD Services***

WFB provided an excellent level of CD services in Minneapolis-St. Paul-Bloomington MSA. WFB is a leader in providing CD services. WFB employees provided a total of 4,406 hours of CD services. These hours represented 625 CD service activities that benefited 86 different organizations and amounted to more than ten hours per branch per year. Of the CD service activities, 3.5 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Minneapolis-St. Paul-Bloomington MSA include the following:

- A WFB employee serves on the loan committee of a non-profit organization that

loans money to small immigrant owned businesses. The organization works within the immigrant communities of Minnesota to start and sustain successful businesses, build assets and promote community reinvestment.

- A WFB employee serves on, and chairs, the loan committee for an affordable housing fund that assists organizations working in neighborhoods statewide threatened by foreclosure, to acquire vacant, boarded homes to repair and sell to responsible homeowners. The loan funds also help create new affordable housing opportunities for individuals and families so they can afford to purchase newly rehabilitated energy-efficient homes. WFB has also invested in the fund. The effect of the investment is discussed under the Investment Test.

## **New York-Northern New Jersey Long Island (New York-New Jersey-Pennsylvania) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: 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 the following:

- WFB's lending levels reflect excellent responsiveness to credit needs of its full-scope AAs.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope AAs.
- The distribution of WFB's borrowers reflects adequate penetration among retail customers of different income levels and business customers of different size within its full-scope AAs.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has a significant level of qualified CD investments and grants within its full-scope AAs.
- WFB's delivery systems are accessible to essentially all portions of its full-scope AAs.
- To the extent changes have been made, WFB's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals within its full-scope AAs.

### **Description of Institution's Operations in the New York-Northern New Jersey-Long Island MSA**

Of the bank's 54 state and multistate rating areas, New York-Northern New Jersey-Long Island MSA ranks sixth and accounts for \$32.1 billion or 3.8 percent of total bank deposits as of June 30, 2012.

WFB has two defined AAs in the New York-Northern New Jersey-Long Island MSA, which include two of the four MDs that make up the MSA. For consistency with prior periods, the two other MDs, the Edison-New Brunswick, NJ MD and the Nassau-Suffolk, NY MD, were selected for full-scope reviews as part of the New Jersey and New York state rating areas.

WFB operates 208 branches. WFB is the seventh largest banking institution in New York-Northern New Jersey-Long Island MSA with 3.7 percent of the deposit market

share. Primary competitors include JP Morgan Chase Bank and Bank of New York Mellon, with 34.3 percent and 7.8 percent, respectively.

## **Scope of Evaluation in the State of New York-Northern New Jersey-Long Island MSA**

The New York-White Plains-Wayne and Newark-Union multistate MDs were selected for full-scope review.

Because WFB's branches in the MSA have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for the MSA is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

Refer to the market profiles for the New York-White Plains-Wayne, NY-NJ and Newark-Union, NJ-PA multistate MDs 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 New York-Northern New Jersey-Long Island MSA is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the New York-White Plains-Wayne and Newark-Union multistate MDs is good.

### **Lending Activity**

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the New York-Northern New Jersey-Long Island MSA full-scope AAs is excellent.

New York-White Plains-Wayne MD: WFB's lending activity in the New York-White Plains-Wayne MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms was equal to or exceeded its ranking or percentage market share of deposits.

Newark-Union MD: WFB's lending activity in the Newark-Union MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to farms was equal to or exceeded its ranking or percentage market share of deposits, and for small loans to businesses was reasonably near its ranking of deposits.

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

Distribution of loans by income level of the geography in the New York-Northern New Jersey-Long Island MSA full-scope AAs is adequate.

### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

New York-White Plains-Wayne MD: WFB's geographic distribution of home purchase loans by income level in the New York-White Plains-Wayne MD is excellent. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies exceeds the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the New York-White Plains-Wayne MD is excellent. Its distribution of loans in low-income geographies is near to the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies approximates the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the New York-White Plains-Wayne MD is poor. Its distribution of loans in low-income geographies is lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home

refinance loans in moderate-income geographies is somewhat lower than its overall market share.

Newark-Union MD: WFB's geographic distribution of home purchase loans by income level in the Newark-Union MD is excellent. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies exceeds the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Newark-Union MD is excellent. Its distribution of loans in low-income geographies approximates the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies exceeds the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Newark-Union MD is adequate. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

### ***Small Loans to Businesses***

Refer to Table 6 in the New York-Northern New Jersey-Long Island MSA section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

New York-White Plains-Wayne MD: WFB's geographic distribution of small loans to businesses in the New York-White Plains-Wayne MD is poor. The bank's distribution of small loans to businesses in low-income geographies is significantly lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of

small loans to businesses in moderate-income geographies is somewhat lower than its overall market share of such loans in the AA.

Newark-Union MD: WFB's geographic distribution of small loans to businesses in the Newark-Union MD is adequate. The bank's distribution of small loans to businesses in low-income geographies is lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the New York-White Plains-Wayne and Newark-Union MDs because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

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

Distribution of loans by income level of the borrower in the New York-Northern New Jersey-Long Island MSA full-scope AAs is adequate.

### ***Home Mortgage Loans***

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

New York-White Plains-Wayne MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the New York-White Plains-Wayne MD is very poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers is significantly lower than the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the New York-White Plains-Wayne MD is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the New York-White Plains-Wayne MD is very poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is significantly lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is significantly lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

Newark-Union MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Newark-Union MD is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Newark-Union MD is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is equal to the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Newark-Union MD is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

Refer to Table 11 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

New York-White Plains-Wayne MD: WFB’s distribution of small loans to businesses based on the revenue size of the businesses in the New York-White Plains-Wayne MD is good. WFB’s percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB’s market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Newark-Union MD: WFB’s distribution of small loans to businesses based on the revenue size of the businesses in the Newark-Union MD is good. WFB’s percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB’s market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to businesses.

We did not assess borrower distribution of small loans to farms in the New York-White Plains-Wayne and Newark-Union MDs because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

### **CD Lending**

Refer to Table 1 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the bank’s level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The volume and nature of the bank’s CD lending had a positive effect on performance in the New York-Northern New Jersey-Long Island MSA. We considered the shorter evaluation period for AAs within the MSA in our assessment of CD loans.

New York-White Plains-Wayne MD: The volume and nature of WFB’s CD lending had a significantly positive effect on Lending Test performance in the New York-White Plains-

Wayne MD. During the evaluation period, the bank originated 18 CD loans totaling \$554 million and equal to 24 percent of allocated Tier 1 Capital.

Approximately 61 percent of these loans were targeted to affordable housing, six percent to community services, 22 percent to economic development, and 11 percent to stabilization and revitalization efforts.

Highlights of WFB's CD lending that benefited the New York-White Plains-Wayne MD include the following:

- In August 2012, WFB provided a \$450 million loan for the purpose of refinancing a 1,689-unit Section 8 affordable housing complex located in the New York-White Plains-Wayne MD. The complex was established in 1977 specifically for performing artists with the help of New York City's Department of Housing Preservation and Development. Actors, dancers, musicians and singers make up 70 percent of the residents. Fifteen hundred and seventeen of the units are restricted to tenants earning 80 percent or less of the area's median family income.
- In September 2010, WFB provided a \$16 million loan to a loan fund in the New York-White Plains-Wayne MD. This Fund is a single purpose entity structured solely to provide financing for predevelopment and acquisition needs for affordable housing developers in the five boroughs of New York City. Its purpose is to purchase, fund and/or credit enhance project loans secured by real estate underwritten by designated lenders that encourage and facilitate the development of affordable housing, improve community stability and enable New York City to address the challenges of expiring use housing preservation properties.

Newark-Union MD: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Newark-Union MD. During the evaluation period, the bank originated three CD loans totaling \$31.4 million and equal to 2.3 percent of allocated Tier 1 Capital.

One of the loans was targeted to affordable housing and the remaining two were for community services.

Highlights of WFB's CD lending that benefited the Newark-Union MD include the following:

- In May 2011, WFB provided a \$30.7 million term loan to an entity for the purpose of acquiring a 306-unit affordable housing project located in Newark, New Jersey. All 306 units are rent restricted to tenants earning less than 50 percent of the area's median family income (AMI) and either over 62 years old or disabled.
- In April 2012, WFB renewed a \$400,000 working capital line of credit and provided

an increase of \$250,000, for a total of \$650,000, for a nonprofit organization located in a low-income census tract in Elizabeth, New Jersey. This nonprofit organization provides psychiatric rehabilitation services to adults who have serious mental illnesses to help them live as independently as possible in the community.

## INVESTMENT TEST

Refer to Table 14 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the bank’s level of qualified investments.

WFB’s Investment Test performance in New York-Northern New Jersey-Long Island MSA is rated **High Satisfactory**. Based on full-scope reviews, the bank’s performance is excellent in the New York-White Plains-Wayne, NY-NJ MD and adequate in Newark-Union, NJ-PA MD.

## Conclusions for Areas Receiving Full-Scope Reviews

New York-White Plains-Wayne MD: WFB’s Investment Test performance in the New York-White Plains-Wayne MD is excellent. During the evaluation period, the bank made 244 grants and qualified investments totaling \$292.4 million that are equal to 12.9 percent of allocated Tier 1 Capital. The total included 219 grants and contributions worth \$7.7 million. WFB has 17 ongoing qualified investments originated in prior periods that total \$32.7 million that are equal to 1.5 percent Tier 1 Capital and provide continuing benefit to the community.

WFB’s investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing, primarily through affordable housing bonds or national funds, and to a limited extent to economic development and neighborhood revitalization and stabilization. Investments during the current evaluation period have created over 2,989 units of affordable housing in the New York-White Plains-Wayne MD.

Examples of significant investments made in the New York-White Plains-Wayne MD during the evaluation period are:

- In September 2011, WFB invested \$39 million in a New Markets Tax Credit (NMTC) project in Jersey City, New Jersey. The proceeds were used for the development of a campus and community resource center to service the students of a college as well as the greater Jersey City community. The project will be located in one of 17 communities to be federally designated as part of the Choice Neighborhoods Initiative to transform distressed neighborhoods and public and assisted projects into viable and sustainable mixed-income neighborhoods. This designation targets areas with high unemployment rates and under-served in regards to educational

opportunities and medical facilities.

- In July 2011, WFB invested \$350,000 in a Housing Fund. The funds will be used for the organization's Affordable Housing Loan Pool, which provides long term, low-cost loans to close funding gaps such as pre-development expenses and bridge loans in affordable housing projects in the lower Hudson Valley of New York. WFB's investment was allocated among three AAs within the Hudson Valley.

Newark-Union MD: WFB's Investment Test performance in the Newark-Union MD is adequate. During the evaluation period, the bank made 60 grants and qualified investments totaling \$37 million that are equal to 2.7 percent of allocated Tier 1 Capital. The total included 57 grants and contributions worth \$1.1 million.

WFB's investments exhibit adequate responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing, primarily through investments in mortgage backed securities and national funds, and economic development. Investments during the current evaluation period have created over 393 units of affordable housing in the Newark-Union MD.

Examples of significant investments made in the Newark-Union MD during the evaluation period are:

- In October 2012, WFB invested \$500,000 in an Economic Development Corporation based in Cranford, New Jersey. The funds will be used for the organization's new SBA 7(a) Community Advantage Loan program, funding clients' initial loans prior to being submitted to the SBA. Funds may also be used to fund loans for the organization's Business Growth Fund program. This investment will be used to make loans to businesses primarily located in the Newark-Union MD.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in the New York-Northern New Jersey-Long Island Multistate MSA is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance is adequate in the New York-White Plains-Wayne MD and excellent in the Newark-Union MD.

## **Retail Banking Services**

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.

### ***Accessibility of Delivery Systems***

WFB’s distribution of branches in the New York-Northern New Jersey-Long Island Multistate MSA full-scope AAs is good.

In the New York-White Plains-Wayne MD, WFB’s distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of WFB’s AA.

The percentage distribution of branches in low-income geographies is significantly lower than the percentage of the population residing in these geographies and is very poor. The percentage distribution of branches in moderate-income geographies is below the percentage of the population residing in these geographies and is adequate. However, when considering five middle- and upper-income branch locations that are in close proximity to moderate-income geographies, accessibility improves in moderate-income geographies and is good.

In the Newark-Union MD, WFB’s distribution of branches is excellent. Delivery systems are readily accessible to all of WFB’s AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering four middle- and upper-income branch locations that are in close proximity to moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB’s ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB’s record of opening and closing branches in the New York-Northern New Jersey-Long Island Multistate MSA full-scope AAs is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the New York-White Plains-Wayne MD did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB closed four branches throughout the AA resulting in a net loss of four branches in upper-income geographies during the evaluation period.

WFB's record of opening and closing branches in the Newark-Union MD is excellent. WFB has improved the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened three and closed five branches throughout the AA resulting in a net gain of one branch in a low-income geography and a net loss of three branches in upper-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours do not vary in a way that inconveniences portions of the New York-Northern New Jersey-Long Island Multistate MSA full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the New York-White Plains-Wayne MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 84 percent of branches located in those geographies maintained Saturday hours compared to 87 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Newark-Union MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 86 percent of branches located in those geographies maintained Saturday hours compared to 91 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an adequate level of CD services in the New York-Northern New Jersey-Long Island Multistate MSA full-scope AAs. We considered the shorter evaluation period for the MDs within the MSA in our assessment of CD services.

In the New York-White Plains-Wayne MD, WFB provides an adequate level of CD services. WFB employees provided a total of 609 hours of CD services. These hours represented 193 CD service activities that benefited 66 different organizations and amounted to almost two hours of CD service activities per branch per year. Nine percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the New York-White Plains-Wayne MD include the following:

- A WFB employee serves on the finance committee of a CD Financial Institution established in 1989 to bring financial, technical and educational resources to affordable housing and community and economic development initiatives in the lower Hudson Valley.
- A WFB employee provided Hands On Banking financial training to the students at a predominately low- and moderate-income middle school.

In the Newark-Union MD, WFB provides an adequate level of CD services. WFB employees provided a total of 563 hours of CD services. These hours represented 229 CD service activities that benefited 55 different organizations and amounted to slightly more than two hours of CD service activities per branch per year. Twenty-nine percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Newark-Union MD include the following:

- A WFB employee participates on the board of directors of a neighborhood based human services and CD agency founded by local residents in 1972. The goal of the organization is to "create a stable and compassionate community" by bringing together representatives of various local groups in an attempt to solve some of the neighborhood problems.
- A WFB employee provided technical assistance on financial education to an organization that benefits low income, unemployed residents and families in Newark and Greater Newark.

## **Washington-Arlington-Alexandria (District of Columbia-Virginia-Maryland) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: Outstanding**

**The Lending Test is rated: Outstanding**

**The Investment Test is rated: High Satisfactory**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has a good level of qualified CD investment and grants within its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.
- WFB provides a limited level of CD services within its AA.

### **Description of Institution's Operations in the Washington-Arlington-Alexandria MD**

Of the bank's 54 state and multistate rating areas, Washington-Arlington-Alexandria MD ranks thirteenth and accounts for 2.3 percent of total bank deposits, or \$19 billion as of June 30, 2012. WFB has one defined AA in the Washington-Arlington-Alexandria MD, which includes all of the counties in the MD except for Jefferson County in West Virginia where the bank has no branches. Within the MD, WFB operates 134 branches. WFB is the third largest banking institution in the Washington-Arlington-Alexandria MD with 11.5 percent of the deposit market share. Primary competitors include Capital One, NA and Bank of America, NA with deposit market shares of 15 percent and 10.6 percent, respectively.

Because WFB's branches in the Washington-Arlington-Alexandria MD have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for this AA is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments, and services.

Refer to the market profile for the Washington-Arlington-Alexandria MD in Appendix C for detailed demographics and other performance context information.

## **LENDING TEST**

### **Lending Activity**

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in Washington-Arlington-Alexandria MD is excellent.

WFB's lending activity in the Washington-Arlington-Alexandria MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

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

Geographic distribution of loans in Washington-Arlington-Alexandria MD is good.

#### ***Home Mortgage Loans***

Refer to Tables 2, 3, 4, and 5 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations/purchases.

WFB's distribution of home purchase loans by income level of the geography in the Washington-Arlington-Alexandria MD is good. Its distribution of home purchase loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is reasonably near the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Washington-Arlington-Alexandria MD Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered excellent for moderate-income

geographies. WFB's distribution of home purchase loans by income level of the geography in the Washington-Arlington-Alexandria MD was revised and is now considered excellent as a result of these performance context factors.

WFB's distribution of home improvement loans by income level of the geography in the Washington-Arlington-Alexandria MD is good. Its distribution of home improvement loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is reasonably near the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies substantially meets its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Washington-Arlington-Alexandria MD is good. Its distribution of home refinance loans in low-income geographies is reasonably near the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies substantially meets its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

### ***Small Loans to Businesses***

Refer to Table 6 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

WFB's geographic distribution of small loans to businesses by income level of the geography in the Washington-Arlington-Alexandria MD is adequate. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is somewhat lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds to its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank’s origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the Washington-Arlington-Alexandria MD because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

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

Distribution of loans by income level of the borrower in the Washington-Arlington-Alexandria MD is good.

### ***Home Mortgage Loans***

Refer to Tables 8, 9 and 10 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s home mortgage loan originations and purchases.

WFB's borrower distribution of home purchase loans by income level of the borrower in the Washington-Arlington-Alexandria MD is good. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Washington-Arlington-Alexandria MD is good. Its distribution of home improvement loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Washington-Arlington-Alexandria MD is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within

the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the Washington-Arlington-Alexandria MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered adequate for low-income and good for moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the Washington-Arlington-Alexandria MD was revised and is now considered good as a result of these performance context factors.

### ***Small Loans to Businesses***

Refer to Table 11 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

WFB’s distribution of small loans to businesses based on the revenue size of the businesses in the Washington-Arlington-Alexandria MD is good. WFB’s percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB’s market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination/purchase of small loans to businesses.

We did not assess borrower distribution of small loans to farms in the Washington-Arlington-Alexandria MD because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

## **CD Lending**

Refer to Table 1 in the “Multistate Metropolitan Areas” section of Appendix D for the facts and data used to evaluate the bank’s level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5

includes geographic lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans. We considered the shorter evaluation period for the Washington-Arlington-Alexandria MD in our assessment of CD lending.

The volume and nature of the bank's CD lending had a significantly positive effect on performance in the Washington-Arlington-Alexandria MD. During the evaluation period, the bank originated 19 CD loans totaling \$189.7 million and equal to 8.82 percent of allocated Tier 1 Capital.

Sixty-eight percent of these loans were targeted to affordable housing, 11 percent to stabilization and revitalization efforts, 11 percent to community services, and 10 percent to economic development needs identified in the Washington-Arlington-Alexandria MD. Eleven percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Washington-Arlington-Alexandria MD include the following:

- In October 2011, WFB provided \$5.7 million in private placement bonds to be used to fund a construction loan. The loan will be used to renovate a 160-unit LIHTC affordable housing complex located in a low-income census tract in Washington, District of Columbia. All of the units are restricted to low- or moderate-income tenants.

## INVESTMENT TEST

Refer to Table 14 in the "Multistate Metropolitan Areas" section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. We considered the shorter evaluation period for the Washington-Arlington-Alexandria MD in our assessment of qualified investments.

WFB's Investment Test performance in Washington-Arlington-Alexandria MD is rated **High Satisfactory**.

We considered the shorter evaluation period for the Washington-Arlington-Alexandria MD when assessing WFB's performance in the AA. Performance context issues affecting the availability of CD investments throughout the state of Virginia had a significant impact on our assessment of CD investment performance. Please refer to the Washington-Arlington-Alexandria MD Market Profiles for more information.

During the evaluation period, the bank made 232 grants and qualified investments totaling \$57.9 million that are equal to 2.7 percent of allocated Tier 1 Capital. The total included 196 grants and contributions worth \$18.9 million. WFB has five ongoing qualified investments originated in prior periods that total \$25.5 million, are equal to 1.2 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing, economic development, community services, and revitalization and stabilization. Investments during the current evaluation period have created over 570 units of affordable housing in the Washington-Arlington-Alexandria MD.

Examples of significant investments made in the Washington-Arlington-Alexandria MD during the evaluation period include the following:

In December 2012, WFB invested \$250,000 in a nonprofit CDFI headquartered in Arlington, Virginia, and operating throughout the Washington DC metro area. Funds were used to capitalize the organization's Small Business Administration (SBA) 7(a) lending program. Launched in 2011 by the SBA, the Community Advantage Program is a pilot initiative aimed at increasing the number of SBA 7(a) lenders who reach underserved communities, targeting CDFI's which were previously not able to offer SBA 7(a) loans. The CDFI was created by a large non-profit social service provider agency whose specialty is to help resettle refugees and immigrants to the United States. The CDFI focuses specifically on providing financial resources and support services to refugee individuals, families, and small businesses in the Washington DC metro area

- In August 2011 and March 2012, WFB made two grants totaling \$9.4 million to NeighborWorks® America as part of WFB's NeighborhoodLIFT Down Payment Assistance Program and to fund NeighborWorks® America homeownership and foreclosure prevention activities in the DC area. NeighborWorks® America is the country's preeminent leader in affordable housing and CD. The organization works to create opportunities for lower-income people to live in affordable homes in safe, sustainable neighborhoods that are healthy places for families to grow.

## SERVICE TEST

The bank's performance under the Service Test in the Washington-Arlington-Alexandria MD is rated **High Satisfactory**.

## **Retail Banking Services**

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.

### ***Accessibility of Delivery Systems***

WFB’s distribution of branches in Washington-Arlington-Alexandria MD is excellent. Delivery systems are readily accessible to all. The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies. The percentage distribution of branches in moderate-income geographies is near to the population residing in these geographies and is excellent. However, when considering four middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in moderate-income geographies.

WFB’s ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB’s record of opening and closing branches in Washington-Arlington-Alexandria MD is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed four branches throughout the AA resulting in a net loss of one branch in a moderate-income geography and two branches in upper-income geographies during the evaluation period although the overall branch distribution after closings remained excellent.

### ***Reasonableness of Business Hours and Services***

WFB’s branch operating hours are good and do not vary in a way that inconveniences certain portions of Washington-Arlington-Alexandria MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income areas, 83 percent of branches located in those geographies maintained Saturday hours, compared to 76 percent of branches located in middle- and upper-income areas.

## **CD Services**

WFB provided a poor level of CD services in the Washington-Arlington-Alexandria MD. WFB provides a limited level of CD services. WFB employees provided a total of 540 hours of CD services. These hours represented 166 CD service activities that benefited 46 different organizations, but amounted to less than one and a half hours per branch

per year. Less than three percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Washington-Arlington-Alexandria MD include the following:

- A WFB employee chaired the Development & Outreach Committee of a nonprofit micro lender that provides access to capital for small business in low- and moderate-income areas. The nonprofit is a CDFI dedicated to providing loans and technical assistance for community and economic development in the DC metropolitan area.

## State of Arizona Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Arizona AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Arizona AAs.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Arizona AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants within its full-scope Arizona AAs.
- WFB's delivery systems are accessible to essentially all portions of WFB's full-scope Arizona AAs.

## Description of Institution's Operations in the State of Arizona

Of the bank's 54 state and multistate rating areas, Arizona ranks eleventh and accounts for 2.7 percent of total bank deposits, or \$22.9 billion as of June 30, 2012. WFB has nine defined AAs in Arizona, which include all of the fifteen counties in the state. Within the state, WFB operates 262 branches. WFB is the largest banking institution in Arizona with 26.5 percent of the deposit market share. Primary competitors include JP Morgan Chase Bank, NA and Bank of America, NA with deposit market shares of 25.3 percent and 18.8 percent, respectively.

Refer to the market profile for the Phoenix-Mesa-Glendale MSA and Tucson MSA in Appendix C for detailed demographics and other performance context information for AAs that received full-scope reviews.

## Scope of Evaluation in the State of Arizona

Of WFB's nine AAs in Arizona, the Phoenix-Mesa-Glendale and Tucson MSAs were selected for full-scope review. These AAs accounts for 87.5 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Arizona is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Phoenix-Mesa-Glendale and Tucson MSAs is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the Arizona full-scope AAs is excellent.

Phoenix-Mesa-Glendale MSA: WFB's lending activity in the Phoenix-Mesa-Glendale MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

Tucson MSA: WFB's lending activity in the Tucson MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

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

Geographic distribution of loans in the Arizona full-scope AAs is good. We revised our conclusions to reflect performance context factors identified in the Phoenix-Mesa-Glendale and Tucson MSAs. For more information, please refer to the discussion of performance for the specific AA.

### *Home Mortgage Loans*

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

Phoenix-Mesa-Glendale: WFB's distribution of home purchase loans by income level of the geography in the Phoenix-Mesa-Glendale MSA is adequate. Its distribution of home purchase loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of

home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic conditions affecting the AA and the level of demand for the product as evidenced by industry wide applications, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low-income geographies should be considered adequate in low-income geographies. WFB's distribution of home purchase loans by income level of the geography in the Phoenix-Mesa-Glendale MSA was revised and is now considered good as a result of these performance context factors.

WFB's distribution of home improvement loans by income level of the geography in the Phoenix-Mesa-Glendale MSA is poor. Its distribution of home improvement loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Phoenix-Mesa-Glendale MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Phoenix-Mesa-Glendale MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate in low- and/or moderate-income geographies. WFB's distribution of home refinance loans by income level of the geography in the Phoenix-Mesa-Glendale MSA was revised and is now considered good as a result of these performance context factors.

Tucson MSA: WFB's distribution of home purchase loans by income level of the geography in the Tucson MSA is adequate. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Tucson MSA is poor. Its distribution of home improvement loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Tucson MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

### ***Small Loans to Businesses***

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

Phoenix-Mesa-Glendale MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Phoenix-Mesa-Glendale MSA is good. The bank's distribution of small loans to businesses in low-income geographies is reasonably near the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is somewhat lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the

bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Tucson MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Tucson MSA is good. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies exceeds the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies substantially meets its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Arizona section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Phoenix-Mesa-Glendale MSA: WFB's geographic distribution of small loans to farms by income level of the geography in the Phoenix-Mesa-Glendale MSA is good. The bank's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. Additionally, the bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to farms in moderate-income geographies exceeds the percent of farms in moderate-income geographies. Additionally, the bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

Tucson MSA: WFB's geographic distribution of small loans to farms by income level of the geography in the Tucson MSA is adequate. The bank's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. Additionally, the bank's market share of small loans to farms in low-income geographies is significantly lower than its overall market share of such loans in the AA. The bank's distribution of small loans to farms in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to farms in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in the Arizona full-scope AAs is excellent. We revised our conclusions to reflect performance context factors identified

in the Phoenix-Mesa-Glendale and Tucson MSAs. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Phoenix-Mesa-Glendale MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Phoenix-Mesa-Glendale MSA is excellent. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

When we assessed performance to low- and moderate-income borrowers relative to severe economic conditions affecting the AA and the level of demand for the product as evidenced by industry wide applications, we determined that the distribution of home purchase loans compared to the percent of low-income borrowers should be considered excellent. However, this did not affect the conclusion for this product in this category.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Phoenix-Mesa-Glendale MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers substantially meets its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Phoenix-Mesa-Glendale MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers substantially meets its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the

Phoenix-Mesa-Glendale MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered adequate to low- and excellent to moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the Phoenix-Mesa-Glendale MSA was revised and is now considered good as a result of these performance context factors.

Tucson MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Tucson MSA is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Tucson MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Tucson MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the Tucson MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered adequate for low- and excellent for moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the Tucson MSA was revised and is now considered good as a result of these performance context factors.

### ***Small Loans to Businesses***

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

Phoenix-Mesa-Glendale MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Phoenix-Mesa-Glendale MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Tucson MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Tucson MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Arizona section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Phoenix-Mesa-Glendale MSA: WFB's distribution of small loans to farms based on the revenue size of the farm in the Phoenix-Mesa-Glendale MSA is adequate. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Tucson MSA: WFB's distribution of small loans to farms based on the revenue size of the farm in the Tucson MSA is adequate. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

### **CD Lending**

Refer to Table 1 in the Arizona section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic

lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Arizona full-scope AAs.

Phoenix-Mesa-Glendale MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Phoenix-Mesa-Glendale MSA. During the evaluation period, the bank originated 81 CD loans totaling \$173.9 million and equal to 9.2 percent of allocated Tier 1 Capital.

Twenty percent of the CD loans addressed the identified need for affordable housing, 72 percent for community services, seven percent for economic development and one percent for stabilization and revitalization. Fourteen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Phoenix-Mesa-Glendale MSA include the following:

- In August 2009, WFB provided a \$750,000 line of credit for the purpose of providing working capital to a nonprofit organization located in a moderate-income census tract in Mesa, Arizona. The borrower provides educational, therapeutic, rehabilitation and social services to children and adults with developmental, physical, and mental disabilities, the majority of who are low- or moderate-income. The organization's programs include behavioral health services, community living services and employment related services.
- In September 2012, WFB provided a \$1.1 million working capital line of credit to a nonprofit affordable housing developer located in a moderate-income census tract in Peoria, Arizona. This affordable housing nonprofit was formed in June 2008 to strengthen the community by providing homeownership opportunities for low-income working families through the use of donated materials, no or low interest mortgages, homeowner education/counseling, and volunteer partnerships within the community and with various organizations. The funds will be used for up-front home building and renovation costs.

Tucson MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Tucson MSA. During the evaluation period, the bank originated 31 CD loans totaling \$49.1 million and equal to 12.8 percent of allocated Tier 1 Capital.

Sixteen percent of these loans were targeted to affordable housing, 55 percent to community services, and 29 percent to economic development needs identified in the Tucson MSA. Thirteen percent of WFB's CD loans were considered particularly

complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Tucson MSA include the following:

- In January 2012, WFB provided a \$4.6 million term loan for the purpose of refinancing bonds that were used for constructing a new facility for a nonprofit organization located in a low-income census tract in Tucson, Arizona and serving predominately low- and moderate-income clients. The nonprofit was formed in 1987 to build strong families and communities by helping Arizona youth and adults to cope effectively with the challenges of life. Principal activities consist of providing a full continuum of behavioral health care services, such as counseling, crisis intervention, and activities relating to the prevention of suicide.
- In January 2012, WFB renewed a \$1 million working capital line of credit to fund operations for a nonprofit organization, located in a low-income census tract in Tucson, Arizona and serving predominately low- and moderate-income clients. The nonprofit was formed in 1987 to build strong families and communities by helping Arizona youth and adults to cope effectively with the challenges of life. Principal activities consist of providing a full continuum of behavioral health care services, such as counseling, crisis intervention, and activities relating to the prevention of suicide.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Prescott MSA is not inconsistent with the bank's overall **Outstanding** performance under the Lending Test in Arizona. In the Flagstaff, Lake Havasu City-Kingman, and Yuma MSAs and the Eastern Arizona, Nogales-Douglas, and Western Arizona Non-Metropolitan AAs performance is weaker than the bank's overall **Outstanding** Lending Test performance in Arizona. Performance in the limited-scope AAs did not influence the Lending Test rating in Arizona.

Refer to the Tables 1 through 13 in the Arizona section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Arizona is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Phoenix-Mesa-Glendale and Tucson MSAs is excellent.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two grants totaling \$20,000 that benefited the entire state during the evaluation period. WFB has three ongoing qualified investments originated in prior periods that total \$5.2 million and provide continuing benefit to the entire state. The prior and current period statewide investments are less than one percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating is minimal.

## Conclusions for Areas Receiving Full-Scope Reviews

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

Phoenix-Mesa-Glendale MSA: WFB's Investment Test performance in the Phoenix-Mesa-Glendale MSA is excellent. During the evaluation period, the bank made 213 grants and qualified investments totaling \$91.8 million that are equal to 5 percent of allocated Tier 1 Capital. The total included 155 grants and contributions worth \$3.87 million. WFB has 38 ongoing qualified investments originated in prior periods that total \$51.3 million, are equal to 2.7 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing and community services. Investments during the current evaluation period have created over 248 units of affordable housing in the Phoenix-Mesa-Glendale MSA.

Examples of significant investments made in the Phoenix-Mesa-Glendale MSA during the evaluation period include the following:

- In November 2009, WFB invested \$12.6 million in a food bank. WFB's NMTC investment was used to expand operations, acquire a new building, and renovate existing facilities. The added capacity will allow St Mary's to expand their client base at a time when demand for the agency's services have grown dramatically due to the economic downturn.
- In October 2009, WFB invested \$300,000 in a CD Corporation (CDC). WFB's investment was used to provide additional funds for the CDC to expand its program into the City of Chandler. Use of funds included acquisition and rehabilitation, and the leveraging of Chandler's federal funding under the Neighborhood Stabilization Program. Through CDC's contract with the city, the organization expects to rehabilitate and sell 17 formerly foreclosed houses each year. The homes are sold to income-qualified borrowers through a community land trust program that maintains permanent home affordability.

Tucson MSA: WFB's Investment Test performance in the Tucson MSA is excellent. During the evaluation period, the bank made 22 grants and qualified investments totaling \$42.1 million that are equal to 11.3 percent of allocated Tier 1 Capital. The total included 19 grants and contributions worth \$212,500. WFB has eight ongoing qualified investments originated in prior periods that total \$2.8 million, are equal to 0.8 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing and revitalization and stabilization. Investments during the current evaluation period have created over 142 units of affordable housing in the Tucson MSA.

Examples of significant investments made in the Tucson MSA during the evaluation period include the following:

- In December 2011, WFB invested \$8.7 million in a tribal sponsored CD Corporation for a NMTC project located in Tucson, Arizona. The investment will be used to provide financing for an education center, a new 39,500 square foot center on the tribe's reservation. The site is adjacent to a recently constructed Head Start facility and is a key component of the tribe's master plan of developing the area into a comprehensive education complex.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Lake Havasu City-Kingman MSA and the Eastern Arizona Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance under the Investment Test in Arizona. The bank's performance in the Flagstaff, Prescott, and Yuma MSAs and Nogales-Douglas and Western Arizona Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance under the Investment Test for Arizona. Performance in the limited-scope AAs did not influence the Investment Test rating in Arizona.

Refer to Table 14 in the 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 the state of Arizona is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Phoenix-Mesa-Glendale MSA is adequate and in the Tucson MSA is excellent.

### Retail Banking Services

Refer to Table 15 in the 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.

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Arizona full-scope AAs is good.

In the Phoenix-Mesa-Glendale MSA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all portions of WFB's AA.

The percentage distribution of branches in low-income geographies is lower than the percentage of the population residing in these geographies and is poor. The percentage distribution of branches in moderate-income geographies is somewhat lower than the percentage of the population residing in these geographies and is adequate. However, when considering 27 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies and is adequate and good respectively.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Tucson MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low-income geographies is somewhat lower than the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when considering five middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low-income geographies and is good.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Arizona full-scope AAs is adequate and has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Phoenix-Mesa-Glendale MSA is adequate. WFB has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened six and closed 20 branches throughout the AA resulting in a net loss of five branches in moderate-income geographies, five branches in middle-income geographies and 4 branches in upper-income geographies during the evaluation period. The majority of the closings were to consolidate redundant branches of the former Wachovia Bank branch network.

WFB's record of opening and closing branches in the Tucson MSA did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB closed four branches throughout the AA resulting in a net loss of one branch in a middle-income geography and three branches in upper-income geographies during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of Arizona full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Phoenix-Mesa-Glendale MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 94 percent of branches located in those geographies maintained Saturday hours, compared to 96 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Tucson MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 87 percent of

branches located in those geographies maintained Saturday hours, compared to 96 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an excellent level of CD services in Arizona full-scope AAs.

In the Phoenix-Mesa-Glendale MSA, WFB is a leader in providing CD services. WFB employees provided a total of 3,979 hours of CD services. These hours represented 596 CD service activities that benefited 69 different organizations an amounted to almost five and a half CD service hours per branch per year. Thirty-seven percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Phoenix-Mesa-Glendale MSA include the following:

- A WFB employee is an active member of the board of directors of an affordable housing organization with a mission to help hard-working families realize the dream of financially stable homeownership by providing a full range of programs and services that encourage, create and support affordable homeownership.
- WFB employees provide many hours of financial education to schools and organizations that serve predominately low- and moderate-income individuals and families.

In the Tucson MSA, WFB is a leader in providing CD services. WFB employees provided a total of 1,076 hours of CD services. These hours represented 125 CD service activities that benefited 18 different organizations and amounted to more than six CD service hours per branch per year. Forty-two percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Tucson MSA include the following:

- A WFB employee is an active member of the board of directors of an organization that serves the needs of predominately low- and moderate-income children and families with more than 40 programs and services that focus on prevention, intervention and permanency to provide a permanent home that is safe and nurturing.
- WFB employees provide many hours of financial education to schools and organizations that serve predominately low- and moderate-income individuals and families.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Lake Havasu City-Kingman, AZ MSA is not inconsistent with the bank's overall **High Satisfactory** performance in Arizona. Performance under the Service Test in the Flagstaff, Prescott, and Yuma MSAs and Nogales-Douglas Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in Arizona. Performance under the Service Test in the Western Arizona and Eastern Arizona Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Arizona. Performance in limited-scope areas did not influence the Service Test performance in Arizona.

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

## State of California Rating

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

The major factors that support this rating include the following:

- WFB's Lending levels reflect excellent responsiveness to the credit needs of its full-scope California AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope California AAs.
- The distribution of WFB's borrower reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope California AAs.
- CD lending has a significantly positive impact on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants, often in a leadership position within WFB's full-scope California AAs.
- WFB's delivery systems are readily accessible to all portions of the it's full-scope California AAs.
- WFB's record of opening and closing branches and reasonableness of business hours within WFB's full-scope California AAs is good.

### Description of Institution's Operations in the State of California

Of the bank's 54 state and multistate rating areas, California ranks first and accounts for \$184.1 billion or 21.7 percent of total bank deposits as of June 30, 2012. WFB has 32 defined AAs in California, which include 50 out of 58 counties in the state. Within the state, WFB operates 1,041 branches. WFB is the second largest banking institution in California with 19.3 percent of the deposit market share. Primary competitors include Bank of America, NA and JP Morgan Chase Bank with deposit market shares of 25.1 percent and 7.7 percent, respectively.

### Scope of Evaluation in the State of California

Of WFB's 32 AAs in California, the Fresno and Riverside-San Bernardino-Ontario MSAs and the Los Angeles-Long Beach-Glendale, Oakland-Fremont-Hayward, San Francisco-San Mateo-Redwood City, and Santa Ana-Anaheim-Irvine MDs were selected for full-scope review. These MSAs and MDs account for 65.6 percent of the bank's state deposits and are the most significant AAs in the state.

Refer to the market profile for the Fresno and Riverside-San Bernardino-Ontario MSAs and the Los Angeles-Long Beach-Glendale, Oakland-Fremont-Hayward, San Francisco-San Mateo-Redwood City, and Santa Ana-Anaheim-Irvine MDs 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 California full-scope AAs is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Fresno and Riverside-San Bernardino-Ontario MSAs and the Los Angeles-Long Beach-Glendale, Oakland-Fremont-Hayward, San Francisco-San Mateo-Redwood City, and Santa Ana-Anaheim-Irvine MDs is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in California full-scope AAs is excellent.

Fresno MSA: WFB's lending activity in the Fresno MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to farms is equal to or exceeded its ranking or percentage market share of deposits and for small loans to businesses is reasonably near its ranking or percentage market share of deposits.

Los Angeles-Long Beach-Glendale MD: WFB's lending activity in the Los Angeles-Long Beach-Glendale MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

Oakland-Fremont-Hayward MD: WFB's lending activity in the Oakland-Fremont-Hayward MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

Riverside-San Bernardino-Ontario MSA: WFB's lending activity in the Riverside-San Bernardino-Ontario MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

San Francisco-San Mateo-Redwood City MD: WFB's lending activity in the San Francisco-San Mateo-Redwood City MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

Santa Ana-Anaheim-Irvine MD: WFB's lending activity in the Santa Ana-Anaheim-Irvine MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

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

Distribution of loans by income level of the geography in California is good. We adjusted our conclusions to reflect performance context factors identified in the Fresno and Riverside-San Bernardino-Ontario MSAs and Los Angeles-Long Beach-Glendale, Oakland-Fremont-Hayward, San Francisco-San Mateo-Redwood City, and Santa Ana-Anaheim-Irvine MDs. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Fresno MSA: WFB's geographic distribution of home purchase loans by income level in the Fresno MSA is good. Its distribution of loans in low-income census tracts is somewhat lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home purchase loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income census tracts is somewhat lower than the percent of owner-occupied units in moderate-income census tracts. Its market share of home purchase loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Fresno MSA is adequate. Its distribution of loans in low-income census tracts is somewhat lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home improvement loans in low-income census tracts is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income census tracts is lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home improvement loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Fresno MSA is poor. Its distribution of loans in low-income census tracts is significantly lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home refinance loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income census tracts is significantly lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home refinance loans in moderate-income census tracts exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to extremely severe economic and demographic conditions discussed in the Fresno MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Fresno MSA was revised and is now considered good as a result of the performance context factor.

Los Angeles-Long Beach-Glendale MD: WFB's geographic distribution of home purchase loans by income level in the Los Angeles-Long Beach-Glendale MD is excellent. Its distribution of loans in low-income census tracts exceeds the percent of owner-occupied units in low-income census tracts. WFB's market share of home purchase loans in low-income census tracts is reasonably near to its overall market share. WFB's geographic distribution of home purchase loans in moderate-income census tracts exceeds the percent of owner-occupied units in moderate-income census tracts. Its market share of home purchase loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Los Angeles-Long Beach-Glendale MD is adequate. Its distribution of loans in low-income census tracts is somewhat lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home improvement loans in low-income census tracts is reasonably near its overall market share. WFB's geographic distribution of home improvement loans in moderate-income census tracts is somewhat lower than the percent of owner-occupied units in moderate-income census tracts.

WFB's market share of home improvement loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Los Angeles-Long Beach-Glendale MD is poor. Its distribution of loans in low-income census tracts is significantly lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home refinance loans in low-income census tracts is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income census tracts is lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home refinance loans in moderate-income census tracts is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Los Angeles-Long Beach-Glendale MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and/or moderate-income geographies should be considered poor in low-income geographies and adequate in moderate-income geographies. WFB's geographic distribution of home refinance loans by income level in the Los Angeles-Long Beach-Glendale MD was revised and is now considered adequate as a result of these performance contexts factor.

Oakland-Fremont-Hayward MD: WFB's geographic distribution of home purchase loans by income level in the Oakland-Fremont-Hayward MD is excellent. Its distribution of loans in low-income census tracts exceeds the percent of owner-occupied units in low-income census tracts. WFB's market share of home purchase loans in low-income census tracts is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income census tracts exceeds the percent of owner-occupied units in moderate-income census tracts. Its market share of home purchase loans in moderate-income census tracts is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Oakland-Fremont-Hayward MD is good. Its distribution of loans in low-income census tracts is reasonably near the percent of owner-occupied units in low-income census tracts. WFB's market share of home improvement loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income census tracts is somewhat lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home improvement loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Oakland-Fremont-Hayward MD is poor. Its distribution of loans in low-income census tracts is

significantly lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home refinance loans in low-income census tracts is somewhat lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income census tracts is lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home refinance loans in moderate-income census tracts exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic conditions affecting the AA and the level of demand for the product as evidenced by industry wide applications and economic and demographic conditions discussed in the Oakland-Fremont-Hayward MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate in low- and/or moderate-income geographies. WFB's geographic distribution of home refinance loans by income level in the Oakland-Fremont-Hayward MD was revised and is now considered good as a result of these performance context factors.

Riverside-San Bernardino-Ontario MSA: WFB's geographic distribution of home purchase loans by income level in the Riverside-San Bernardino-Ontario MSA is adequate. Its distribution of loans in low-income census tracts is somewhat lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home purchase loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income census tracts is reasonably near the percent of owner-occupied units in moderate-income census tracts. Its market share of home purchase loans in moderate-income census tracts is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Riverside-San Bernardino-Ontario MSA is good. Its distribution of loans in low-income census tracts is reasonably near the percent of owner-occupied units in low-income census tracts. WFB's market share of home improvement loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income census tracts is somewhat lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home improvement loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Riverside-San Bernardino-Ontario MSA is poor. Its distribution of loans in low-income census tracts is significantly lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home refinance loans in low-income census tracts is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income census tracts is lower than the percent of

owner-occupied units in moderate-income census tracts. WFB's market share of home refinance loans in moderate-income census tracts exceeds its overall market share.

However, when we assessed performance in low- and/or moderate-income geographies relative to severe economic and demographic conditions discussed in the Riverside-San Bernardino-Ontario MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Riverside-San Bernardino-Ontario MSA was revised and is now considered adequate as a result of these performance context factors.

San Francisco-San Mateo-Redwood City MD: WFB's geographic distribution of home purchase loans by income level in the San Francisco-San Mateo-Redwood City MD is excellent. Its distribution of loans in low-income census tracts exceeds the percent of owner-occupied units in low-income census tracts. WFB's market share of home purchase loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income census tracts exceeds the percent of owner-occupied units in moderate-income census tracts. Its market share of home purchase loans in moderate-income census tracts is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the San Francisco-San Mateo-Redwood City MD is good. Its distribution of loans in low-income census tracts is somewhat lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home improvement loans in low-income census tracts is reasonably near its overall market share. WFB's geographic distribution of home improvement loans in moderate-income census tracts approximates the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home improvement loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the San Francisco-San Mateo-Redwood City MD is good. Its distribution of loans in low-income census tracts exceeds the percent of owner-occupied units in low-income census tracts. WFB's market share of home refinance loans in low-income census tracts is somewhat lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income census tracts is somewhat lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home refinance loans in moderate-income census tracts is reasonably near its overall market share.

Santa Ana-Anaheim-Irvine MD: WFB's geographic distribution of home purchase loans by income level in the Santa Ana-Anaheim-Irvine MD is excellent. Its distribution of

loans in low-income census tracts is reasonably near the percent of owner-occupied units in low-income census tracts. WFB's market share of home purchase loans in low-income census tracts exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income census tracts exceeds the percent of owner-occupied units in moderate-income census tracts. Its market share of home purchase loans in moderate-income census tracts is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Santa Ana-Anaheim-Irvine MD is adequate. Its distribution of loans in low-income census tracts is lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home improvement loans in low-income census tracts is lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income census tracts exceeds the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home improvement loans in moderate-income census tracts exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Santa Ana-Anaheim-Irvine MD is poor. Its distribution of loans in low-income census tracts is significantly lower than the percent of owner-occupied units in low-income census tracts. WFB's market share of home refinance loans in low-income census tracts is equal to its overall market share. WFB's geographic distribution of home refinance loans in moderate-income census tracts is significantly lower than the percent of owner-occupied units in moderate-income census tracts. WFB's market share of home refinance loans in moderate-income census tracts is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to economic and demographic conditions discussed in the Santa Ana-Anaheim-Irvine MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate in low- and moderate-income geographies. WFB's geographic distribution of home refinance loans by income level in the Santa Ana-Anaheim-Irvine MD was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

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

Fresno MSA: WFB's geographic distribution of small loans to businesses in the Fresno MSA is excellent. The bank's distribution of small loans to businesses in low-income

geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Los Angeles-Long Beach-Glendale MD: WFB's geographic distribution of small loans to businesses in the Los Angeles-Long Beach-Glendale MD is adequate. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is somewhat lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Oakland-Fremont-Hayward MD: WFB's geographic distribution of small loans to businesses in the Oakland-Fremont-Hayward MD is adequate. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Riverside-San Bernardino-Ontario MSA: WFB's geographic distribution of small loans to businesses in the Riverside-San Bernardino-Ontario MSA is good. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

San Francisco-San Mateo-Redwood City MD: WFB's geographic distribution of small loans to businesses in the San Francisco-San Mateo-Redwood City MD is good. The bank's distribution of small loans to businesses in low-income geographies is somewhat

lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies approximates the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Santa Ana-Anaheim-Irvine MD: WFB's geographic distribution of small loans to businesses in the Santa Ana-Anaheim-Irvine MD is excellent. The bank's distribution of small loans to businesses in low-income geographies approximates the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is equal to its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the California section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Fresno MSA: WFB's geographic distribution of small loans to farms in the Fresno MSA is excellent. WFB's distribution of small loans to farms in low-income geographies exceeds the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies approximates the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

Los Angeles-Long Beach-Glendale MD: WFB's geographic distribution of small loans to farms in the Los Angeles-Long Beach-Glendale MD is adequate. WFB's distribution of small loans to farms in low-income geographies is somewhat lower than the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies is significantly lower than its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is reasonably near the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Oakland-Fremont-Hayward MD: WFB's geographic distribution of small loans to farms in the Oakland-Fremont-Hayward MD is poor. WFB's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is somewhat lower than the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies is somewhat lower than its overall market share of such loans in the AA.

Riverside-San Bernardino-Ontario MSA: WFB's geographic distribution of small loans to farms in the Riverside-San Bernardino-Ontario MSA is adequate. WFB's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies is lower than its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is reasonably near the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

San Francisco-San Mateo-Redwood City MD: WFB's geographic distribution of small loans to farms in the San Francisco-San Mateo-Redwood City MD is excellent. WFB's distribution of small loans to farms in low-income geographies exceeds the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies is reasonably near its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies exceeds the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

Santa Ana-Anaheim-Irvine MD: WFB's geographic distribution of small loans to farms in the Santa Ana-Anaheim-Irvine MD is good. WFB's distribution of small loans to farms in low-income geographies exceeds the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies is reasonably near its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is somewhat lower than the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in California full-scope AAs is good. We adjusted our conclusions to reflect performance context factors identified in the

Fresno and Riverside-San Bernardino-Ontario MSAs and Los Angeles-Long Beach-Glendale, Oakland-Fremont-Hayward, San Francisco-San Mateo-Redwood City, and Santa Ana-Anaheim-Irvine MDs. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Fresno MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Fresno MSA is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the Fresno MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of low- and moderate-income borrowers should be considered good for low-income borrowers and excellent for moderate-income borrowers. WFB's borrower distribution of home purchase loans by income level of the borrower in the Fresno MSA was revised and is now considered excellent as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Fresno MSA is poor. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is significantly lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers is lower than its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Fresno MSA is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA.

WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the Fresno MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered adequate for low- and moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the Fresno MSA was revised and is now considered adequate as a result of these performance context factors.

Los Angeles-Long Beach-Glendale MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Los Angeles-Long Beach-Glendale MD is adequate. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the Los Angeles-Long Beach-Glendale MD Market Profile, we determined that distribution of home purchase loans compared to the percent of low- and moderate-income borrowers should be considered adequate for low-income borrowers and excellent for moderate-income borrowers. WFB's borrower distribution of home purchase loans by income level of the borrower in the Los Angeles-Long Beach-Glendale MD was revised and is now considered good as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Los Angeles-Long Beach-Glendale MD is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Los Angeles-Long Beach-Glendale MD is very poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home refinance loans to

moderate-income borrowers is significantly lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the Los Angeles-Long Beach-Glendale MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered poor for low-income and adequate for moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the Los Angeles-Long Beach-Glendale MD was revised and is now considered poor as a result of these performance context factors.

Oakland-Fremont-Hayward MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Oakland-Fremont-Hayward MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Oakland-Fremont-Hayward MD is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is reasonably near the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Oakland-Fremont-Hayward MD is poor. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the Oakland-Fremont-Hayward MD Market Profile, we determined that distribution of home refinance loans compared to the percent of moderate-income borrowers should be considered adequate for moderate-income borrowers. WFB's borrower distribution of home

refinance loans by income level of the borrower in the Oakland-Fremont-Hayward MD was revised and is now considered adequate as a result of these performance context factors

Riverside-San Bernardino-Ontario MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Riverside-San Bernardino-Ontario MSA is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Riverside-San Bernardino-Ontario MSA is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Riverside-San Bernardino-Ontario MSA is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers exceeds its overall market share.

San Francisco-San Mateo-Redwood City MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the San Francisco-San Mateo-Redwood City MD is adequate. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the San

Francisco-San Mateo-Redwood City MD Market Profile, we determined that distribution of home purchase loans compared to the percent of low- and moderate-income borrowers should be considered adequate for low-income and good for moderate-income borrowers. WFB's borrower distribution of home purchase loans by income level of the borrower in the San Francisco-San Mateo-Redwood City MD was revised and is now considered good as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the San Francisco-San Mateo-Redwood City MD is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the San Francisco-San Mateo-Redwood City MD is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the San Francisco-San Mateo-Redwood City MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered poor for low-income and adequate for moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the San Francisco-San Mateo-Redwood City MD was revised and is now considered adequate as a result of these performance context factors.

Santa Ana-Anaheim-Irvine MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Santa Ana-Anaheim-Irvine MD is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers is reasonably near the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the Santa Ana-Anaheim-Irvine MD Market Profile, we determined that distribution of home purchase loans compared to the percent of low- and moderate-income borrowers should be considered adequate for low-income borrowers and excellent for moderate-income borrowers. WFB's borrower distribution of home purchase loans by income level of the borrower in the Santa Ana-Anaheim-Irvine MD was revised and is now considered good as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Santa Ana-Anaheim-Irvine MD is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Santa Ana-Anaheim-Irvine MD is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

Fresno MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Fresno MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Los Angeles-Long Beach-Glendale MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Los Angeles-Long Beach-Glendale MD is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the

AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Oakland-Fremont-Hayward MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Oakland-Fremont-Hayward MD is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Riverside-San Bernardino-Ontario MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Riverside-San Bernardino-Ontario MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

San Francisco-San Mateo-Redwood City MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the San Francisco-San Mateo-Redwood City MD is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Santa Ana-Anaheim-Irvine MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Santa Ana-Anaheim-Irvine MD is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the California section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Fresno MSA: WFB's distribution of small loans to farms based on the revenue size of the farms in the Fresno MSA is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Los Angeles-Long Beach-Glendale MD: WFB's distribution of small loans to farms based on the revenue size of the farms in the Los Angeles-Long Beach-Glendale MD is adequate. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Oakland-Fremont-Hayward MD: WFB's distribution of small loans to farms based on the revenue size of the farms in the Oakland-Fremont-Hayward MD is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Riverside-San Bernardino-Ontario MSA: WFB's distribution of small loans to farms based on the revenue size of the farms in Riverside-San Bernardino-Ontario MSA is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

San Francisco-San Mateo-Redwood City MD: WFB's distribution of small loans to farms based on the revenue size of the farms in the San Francisco-San Mateo-Redwood City MD is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Santa Ana-Anaheim-Irvine MD: WFB's distribution of small loans to farms based on the revenue size of the farms in the Santa Ana-Anaheim-Irvine MD is adequate. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## CD Lending

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

The volume and nature of the bank's CD lending had a significantly positive effect on lending performance in California full-scope AAs. Performance context issues affecting the availability of CD loans throughout the state of California had a significant impact on our assessment of CD lending performance. Please refer to the California full-scope AAs Market Profiles for more information.

California Statewide: The volume and nature of WFB's CD lending to organizations that serve the entire state had a neutral effect on Lending Test performance in California. During the evaluation period, the bank originated five CD loans totaling \$123 million and equal to 0.5 percent of allocated Tier 1 Capital allocated to the entire state of California.

Fresno MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Fresno MSA. During the evaluation period, the bank originated seven CD loans totaling \$44.7 million and equal to 16 percent of allocated Tier 1 Capital.

Twenty-nine percent of these loans were targeted to affordable housing, 14 percent to community services, and 57 percent to neighborhood stabilization and revitalization efforts in the Fresno MSA.

Highlights of WFB's CD lending that benefited the Fresno MSA include the following:

- In March 2011, WFB provided an extension on a \$10.3 million loan for the purpose of constructing an affordable housing development and retail space located in a Redevelopment Zone in a low-income census tract of Fresno, California. This limited liability company is formed specifically for this project, and is affiliated with an organization that has been building homes in the area since the 1970's. This particular development is recognized as a key component of the Fulton Redevelopment Project Area plan.
- In January 2009, WFB provided a \$500,000 line of credit for the purpose of providing working capital to a nonprofit organization located in Fresno, California. This Fresno nonprofit organization is committed to empowering Californians to achieve optimal health and thereby improving their quality of life. This is accomplished by serving the needs of individuals with limited access to healthcare resources and who most often confront barriers related to culture, language, immigration status, income, gender, geography, and/or education.

Los Angeles-Long Beach-Glendale MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Los Angeles-Long Beach-Glendale MD. During the evaluation period, the bank originated 142 CD loans totaling \$711 million and equal to 15.63 percent of allocated Tier 1 Capital.

Thirty percent of the these loans were targeted to affordable housing, 4 percent to stabilization and revitalization efforts, 17 percent community services, and 49 percent to economic development needs identified in the Angeles-Long Beach-Glendale MD. Eleven percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Los Angeles-Long Beach-Glendale MD include the following:

- In September 2012, WFB provided a \$40 million loan for the purpose of constructing a retail development located within a moderate-income census tract in South Gate, California. The borrower is a joint venture formed specifically for the purpose of developing and managing the subject property, consisting of 22.82 acres of land to be developed into 227,000 square feet of retail space located within a moderate-income census tract in South Gate, California. The property is located within the City of South Gate's Enterprise Zone, a targeted location within the City established in an effort to boost the creation of new jobs and to encourage business investment. The area has also been identified as a targeted employment area and is an integral part of the City's redevelopment plan. This loan is being provided in combination with a NMTC investment.
- In October 2008, WFB provided a \$2.25 million term loan to a nonprofit providing affordable housing and a broad range of services to predominantly Asian and Pacific Islander clients in the Little Tokyo area of Los Angeles. The loan funded the development of a 27-unit housing development for emancipated foster youth earning between 30 percent and 50 percent of AMI. WFB, in partnership with the organization and other groups, will provide the area's youths a broad range of services at the Center. Additionally, in 2009 WFB renewed a \$200,000 EQ2 for affordable housing acquisition and predevelopment costs. WFB has also provided grants to support the organizations programs.

Oakland-Fremont-Hayward MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Oakland-Fremont-Hayward MD. During the evaluation period, the bank originated 80 CD loans totaling 274.6 million and equal to 13.7 percent of allocated Tier 1 Capital.

Thirty-eight percent of the loans were targeted to affordable housing, 42 percent to community services, and 20 percent to economic development needs of the Oakland-Fremont-Hayward MD. Twenty-one percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Oakland-Fremont-Hayward MD include the following:

- In May 2010, WFB renewed a \$3.5 million line of credit for the purpose of providing working capital to a nonprofit organization located in a moderate-income census tract in Hayward, California. Founded in 1968 to meet the specific needs of low-income people, this organization is one of the oldest and most productive nonprofit affordable housing developers in California. Their mission is to build and maintain high-quality, well-managed, service-enhanced affordable housing communities that meet the needs of very low-, low- and moderate-income families, seniors and persons with disabilities.
- In May 2010, WFB provided a \$6 million term loan for the purpose of financing the acquisition of a facility for a nonprofit organization located in Pleasant Hill, California. The borrower is a community service organization providing values-based experiences for low- and moderate-income households through programs that nurture the healthy development of children and teens, support families and strengthens communities. Services include childcare, Head Start, parent-child programs, youth educational/college preparatory programs and family resources.

Riverside-San Bernardino-Ontario MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Riverside-San Bernardino-Ontario MSA. During the evaluation period, the bank originated 30 CD loans totaling \$139 million and equal to 17.92 percent of allocated Tier 1 Capital.

Fifty-three percent of these loans were targeted to affordable housing, 10 percent to community services, and 37 percent to economic development needs identified in the Riverside-San Bernardino-Ontario MSA. Twenty-seven percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Riverside-San Bernardino-Ontario MSA include the following:

- In December 2010, WFB renewed a \$1 million line of credit for the purpose of providing working capital to a non-profit organization located in Palm Springs, California. The nonprofit provides low cost medical care and comprehensive support services primarily to low-income people living with HIV/AIDS in the desert community. Free, confidential, rapid-result HIV testing is available, as well as counseling, home health services, legal assistance and assistance with housing, medications, food, re-employment and more.
- In February 2010, WFB provided a \$6.2 million loan for the purpose of providing construction financing for a 60-unit LIHTC apartment project located in a moderate-income census tract in Cathedral City, California. The apartments will be affordable

to low- and moderate-income households. The loan is to an affiliate of a non-profit organization committed to transforming communities through high quality affordable housing, family and senior services, and long-term ownership and management.

San Francisco-San Mateo-Redwood City MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the San Francisco-San Mateo-Redwood City MD. During the evaluation period, the bank originated 65 CD loans totaling \$301.5 million and equal to 7.3 percent of allocated Tier 1 Capital.

Thirty-one percent of these loans were targeted to affordable housing, 51 percent to community services, and 18 percent to economic development needs identified in the San Francisco-San Mateo-Redwood City MD. Thirty-six percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the San Francisco-San Mateo-Redwood City MD include the following:

- In March 2011, WFB provided a \$15.9 million loan for the purpose of providing construction financing to acquire and rehabilitate a historic building located in a low-income area of San Francisco, California. This limited partnership is a joint effort between two organizations that share the vision of renovating this historic structure and providing housing and services for veterans who are homeless or are at-risk of becoming homeless; with this project consisting of 76 affordable apartments with rents restricted up to 50 percent median family income. One of the organizations is focused on low- and moderate-income geographies and has a mission to build community and enhance the quality of life for San Francisco residents. The other organization's mission is to heal the wounds, to restore dignity, hope, and self-sufficiency to all veterans in need, and to significantly reduce homelessness and poverty among veterans.
- In April 2011, WFB renewed a \$400,000 line of credit for the purpose of providing working capital to a non-profit located in a low-income census tract in San Francisco, California. The nonprofit operates four programs that serve the homeless and very low-income. They provide housing education and employment services to more than 3,000 parents and children each year.

Santa Ana-Anaheim-Irvine MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Santa Ana-Anaheim-Irvine MD. During the evaluation period, the bank originated 49 CD loans totaling \$223 million and equal to 11.7 percent of allocated Tier 1 Capital.

Twenty-seven percent of these loans were targeted to affordable housing, 4 percent to community services, and 69 percent to economic development needs identified in for the Santa Ana-Anaheim-Irvine MD. Six percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Santa Ana-Anaheim-Irvine MD include the following:

- In May 2009, WFB provided a \$21.8 million loan for the purpose of providing construction financing for a 72-unit affordable LIHTC development located in a moderate-income census tract in Anaheim, California. This limited partnership is an affiliate of an organization whose mission is to promote the creation, preservation and/or rehabilitation of affordable housing for low- and moderate-income households and the elderly. The organization focuses not only on supplying affordable housing, but also on combating community blight and deterioration. The units, half of which consist of two- and three-bedroom units, will be restricted to tenants earning between 30 percent and 60 percent of the area's median family income.
- In December 2011, WFB provided a \$3.7 million line of credit for the purpose of funding predevelopment costs associated with a 76-unit affordable housing complex in San Clemente, California for seniors. The borrower is a real estate development company that develops both new construction and acquisition/rehabilitation projects in Southern California, specializing in LIHTC affordable housing projects. Twenty-nine of the units will be restricted to tenants earning 30 percent or somewhat lower than of the area's median family income and 46 of the units will be restricted to tenants earning 50 percent or somewhat lower than of the area's median family income.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Chico, Hanford-Corcoran, Merced, Modesto, Oxnard-Thousand Oaks-Ventura, Redding, Sacramento--Arden-Arcade--Roseville, Salinas, San Luis Obispo-Paso Robles, Santa Cruz-Watsonville, Santa Rosa-Petaluma, Stockton, Vallejo-Fairfield, Visalia-Porterville and Yuba City MSAs is not inconsistent with the WFB's overall **Outstanding** performance under the Lending Test in California. In the Bakersfield-Delano, Madera-Chowchilla, Napa, San Diego-Carlsbad-San Marcos, San Jose-Sunnyvale-Santa Clara, Santa Barbara-Santa Maria-Goleta, and El Centro MSAs and the Central, Northern and Eastern California and Truckee-Grass Valley Non-Metropolitan AAs the bank's performance is weaker than the bank's overall **Outstanding** performance under the Lending Test in California. Performance in the limited-scope AAs did not influence the Lending Test rating in California. Refer to the

Tables 1 through 13 in the California section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in California is rated **Outstanding**. Based on full-scope reviews, the bank's performance is excellent in the Fresno and Riverside-San Bernardino-Ontario MSAs and the Los Angeles-Long Beach-Glendale, Oakland-Fremont-Hayward, Santa Ana-Anaheim-Irvine and San Francisco-San Mateo-Redwood City MDs.

We also considered performance context factors affecting the level of CD investment opportunities during the evaluation period. Conclusions regarding the level of investment and grant activity took into consideration the significant reduction in CD investment opportunities in the state of California during the evaluation period due to the recession and budget shortfalls at the state and local levels. Please refer to the California full-scope AA Market Profiles for more information.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made seven grants and investments totaling \$83.3 million that benefited the entire state during the evaluation period. WFB has 17 ongoing qualified investments originated in prior periods that total \$31.2 million and provide continuing benefit to the entire state. The current and prior period statewide investments are equal to 0.4 percent and 0.2 percent of allocated Tier 1 Capital allocated to the entire state respectively. The effect on the overall state rating was minimal.

## Conclusions for Areas Receiving Full-Scope Reviews

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

**Fresno MSA:** WFB's Investment Test performance in the Fresno MSA is excellent. During the evaluation period, the bank made 80 grants and qualified investments totaling \$22.8 million that are equal to eight percent of allocated Tier 1 Capital. The total included 77 grants and contributions worth \$2.2 million. WFB has ongoing qualified investments originated in prior periods that total \$2.1 million that are equal to 0.7 percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing and economic development. Investments during the current evaluation periods have created over 215 units of affordable housing in the Fresno MSA.

Examples of significant investments made in the Fresno MSA during the evaluation period include:

- In September 2011, WFB invested \$250,000 in the Fresno CD Financial Institution. The proceeds of this investment were used to fund their small business lending pool. Fresno CDFI provides a variety of financial products to meet the needs of low-income and socially disadvantaged entrepreneurs who are not served by traditional lending agencies.
- In August 2010, WFB invested \$1 million in the Fresno Regional Foundation (FRF). This investment represents the first of its kind, and will act as a pilot program through which FRF will use the strength of its balance sheet to increase the number of dollars available for small business lending in several California communities that have been severely impacted by the recession. Specifically, FRF will relend WFB's investment directly to the Valley Small Business Development Center, which will use the funds to provide small business loans.

Los Angeles-Long Beach-Glendale MD: WFB's Investment Test performance in the Los Angeles-Long Beach-Glendale MD is excellent. During the evaluation period, the bank made 379 grants and qualified investments totaling \$322.5 million that are equal to seven percent of allocated Tier 1 Capital. The total included 29 grants and contributions worth \$14.5. WFB has 78 ongoing qualified investments originated in prior periods that total \$121.6 million that are equal to 2.6 percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing and revitalization and stabilization. Investments during the current evaluation periods have created over 3,545 units of affordable housing in the Los Angeles-Long Beach-Glendale MD.

Examples of significant investments made in the Los Angeles-Long Beach-Glendale MD during the evaluation period include:

- In September 2012, WFB invested \$30 million in a NMTC project located in a moderate-income census tract in the AA. The investment will be used for the construction and development of a large box retail center anchored by a Wal-Mart store. The unemployment rate in this area is 15 percent, more than 1.5 times the national average. The Project is anticipated to generate 661 permanent jobs.
- In October 2009, WFB invested \$400,000 through an EQ2 in a non-profit affordable housing developer. WFB's investment is used for predevelopment and land

acquisition related to affordable housing construction projects throughout Los Angeles County.

Oakland-Fremont-Hayward MD: WFB's Investment Test performance in the Oakland-Fremont-Hayward MD is excellent. During the evaluation period, the bank made 299 grants and qualified investments totaling \$113.9 million that are equal to 5.7 percent of allocated Tier 1 Capital. The total included 23 grants and contributions worth \$715,000. WFB has 36 ongoing qualified investments originated in prior periods that total \$50.2 million that are equal to 2.5 percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing and economic development. Investments during the current evaluation periods have created over 1,618 units of affordable housing in the Oakland-Fremont-Hayward MD.

Examples of significant investments made in the Oakland-Fremont-Hayward MD during the evaluation period include:

- In November 2008, WFB invested \$1.5 million in a start-up business located in Oakland, California that will serve as an outsourcing, placement, training, and employment center for people with disabilities. Most of the clients served are low- and moderate-income individuals that face difficulties finding gainful employment. WFB's investment is used to help capitalize the start-up company. WFB showed leadership by being the only institutional equity investor in the company.
- In November 2009, WFB invested \$500,000 in a foundation, based in Richmond, California, that provides academic coaching and teaching to low-income children in San Francisco and Richmond. WFB's investment is used to bridge funds from the organization's capital campaign that is funding the purchase and rehabilitation of an additional building for the foundation charter school.

Riverside-San Bernardino-Ontario MSA: WFB's Investment Test performance in the Riverside-San Bernardino-Ontario MSA is excellent. During the evaluation period, the bank made 139 grants and qualified investments totaling \$77.5 million that are equal to almost ten percent of allocated Tier 1 Capital. The total included 125 grants and contributions worth \$2.4 million. WFB has 17 ongoing qualified investments originated in prior periods that total \$36.4 million that are equal to 4.6 percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for

affordable housing. Investments during the current evaluation periods have created over 1,268 units of affordable housing in the Riverside-San Bernardino-Ontario MSA.

Examples of significant investments made in the Riverside-San Bernardino-Ontario MSA during the evaluation period are:

- In September 2011, WFB invested \$1.25 million in a nonprofit housing development corporation located in Indio, California. One million dollars of the investment is used to provide general operating funds for the non-profit's affordable housing development efforts and \$250,000 is used for the development of the Las Vegas Road Apartments, a 57-unit multifamily affordable housing project for low-income residents in Palm Springs, California.
- In December 2012, WFB invested \$13.8 million in Ivy at College Park Family Apartments, an affordable housing project in Chino, California. The funds will be used for the construction of a 135-unit complex, consisting of one, two and three-bedroom units restricted to low- and moderate-income families.

San Francisco-San Mateo-Redwood City MD: WFB's Investment Test performance in the San Francisco-San Mateo-Redwood City MD is good. During the evaluation period, the bank made 449 grants and qualified investments totaling \$124.5 million that are equal to three percent of allocated Tier 1 Capital. The total included 403 grants and contributions worth \$9.6 million. WFB has 35 ongoing qualified investments originated in prior periods that total 48 million and are equal to one percent of allocated Tier 1 Capital. These prior period investments provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably economic development and affordable housing. Investments during the current evaluation periods have created over 1,052 units of affordable housing in the San Francisco-San Mateo-Redwood City MD.

Examples of significant investments made in the San Francisco-San Mateo-Redwood City MD during the evaluation period are:

- In March 2011, WFB invested \$20.6 million in Veterans Commons, a historic rehabilitation of a 76-unit apartment building that is located in the South of Market neighborhood of San Francisco, California. The units are restricted to low- and moderate-income special needs and homeless tenants. The bank collaborated with an area CD organization where a WFB employee serves on the board of directors.
- In June 2010, WFB invested \$500,000 through an EQ2 in two affiliate non-profit organizations based in Novato, California. The organizations provide consulting and financing to affordable housing developers and mortgage assistance to low- and

moderate-income homebuyers and act as a permanent development partner that acquires and holds donated land, and develops affordable housing projects. WFB's investment is used for acquisition, rehabilitation, and resale of foreclosed properties in Marin County to low- and moderate-income homebuyers with income up to 65 percent of the area median income.

Santa Ana-Anaheim-Irvine MD: WFB's Investment Test performance in the Santa Ana-Anaheim-Irvine MD is excellent. During the evaluation period, the bank made 316 grants and qualified investments totaling \$88.6 million that are equal to 4.6 percent of allocated Tier 1 Capital. The total included 266 grants and contributions worth \$4.8 million. WFB has 13 ongoing qualified investments originated in prior periods that total \$18.3 million, are equal to one percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing, predominately through mortgage backed securities, and community services. Investments during the current evaluation periods have created over 779 units of affordable housing in the Santa Ana-Anaheim-Irvine MD.

Examples of significant investments made in the Santa Ana-Anaheim-Irvine MD during the evaluation period are:

- In February 2010, WFB invested \$1.5 million through an EQ2 in a nonprofit CD Financial Institution dedicated to transforming declining neighborhoods. The institution offers services that assist first-time low- and moderate-income homebuyers with down payment and closing cost assistance as well as flexible qualification requirements. WFB's funds will be used to help stabilize at-risk neighborhoods where residential properties are in distress due to pending foreclosure or have been vacated and boarded up after foreclosure.
- In February 2009, WFB invested \$3.6 million in a CD Financial Institution based in Lake Forest, California that supports non-traditional lending needs in underserved communities of California. WFB's investment is used to replace an existing bank investor that was forced to surrender its FDIC charter and sell the majority of its assets to a successor bank.

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

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bakersfield-Delano, Chico, Hanford-Corcoran, Madera-Chowchilla, Merced, Modesto, Oxnard-Thousand Oaks-Ventura, Sacramento--Arden-Arcade--Roseville, Salinas, San Diego-Carlsbad-San Marcos, Santa Cruz-Watsonville, Santa Rosa-Petaluma, Vallejo-Fairfield, and Visalia-Porterville MSAs and Northern California Non-

Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance under the Investment Test in California. The bank's performance in the El Centro, Yuba City, Napa, San Jose-Sunnyvale-Santa Clara, Redding, San Luis Obispo-Paso Robles, Santa Barbara-Santa Maria-Goleta, and Stockton MSAs and Truckee-Grass Valley, Central California, and Eastern California Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance under the Investment Test for California. Performance in the limited-scope AAs did not influence the Investment Test rating in California. Refer to Table 14 in the California section of Appendix D for the facts and data that support these conclusions.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test in California is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance is excellent in the Los Angeles-Long Beach-Glendale MD and is good in the Fresno and Riverside-San Bernardino-Ontario MSAs and the Oakland-Fremont-Hayward, San Francisco-San Mateo-Redwood City, and Santa Ana-Anaheim-Irvine MDs.

### Retail Banking Services

Refer to Table 15 in the 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.

### Accessibility of Delivery Systems

WFB's distribution of branches in California full-scope AAs is excellent.

In the Fresno MSA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all portions of its AA.

The percentage distribution of branches in low- and moderate-income geographies is somewhat lower than the percentage of the population residing in these geographies and is adequate.

When considering four middle- and upper-income branch locations that are in close proximity to moderate-income geographies, accessibility improves in moderate-income geographies and is excellent. However, overall distribution of branches remained good.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Los Angeles-Long Beach-Glendale MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of its AA.

The percentage distribution of branches in low-income geographies is near to the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is reasonably near to the percentage of the population residing in these geographies and is good.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA. When considering the alternate delivery system, overall branch distribution is considered excellent.

In the Oakland-Fremont-Hayward MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of its AA.

The percentage distribution of branches in low- and moderate-income geographies is near to the percentage of the population residing in these geographies and is good. However, when considering 14 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Riverside-San Bernardino-Ontario MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low-income geographies approximates the percentage of population residing in those geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of population residing in those geographies and is good. However, when considering 13 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the San Francisco-San Mateo-Redwood City MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in low-income geographies and is somewhat lower than the percentage of the population residing in the moderate income geographies and is considered excellent and adequate respectively. However, when considering five middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in moderate-income geographies and is good. Overall branch distribution improves and is now considered excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Santa Ana-Anaheim-Irvine MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies is somewhat lower than the percentage of population residing in low-income geographies and is near to the percentage of population residing in moderate-income geographies. Performance in these geographies is considered adequate and good respectively. However, when considering 14 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies and is good and excellent respectively.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### **Changes in Branch Location**

To the extent changes have been made, WFB's record of opening and closing branches in California full-scope AAs is good. WFB has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Fresno MSA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the AA resulting in a net loss of one branch in an upper-income geography during the evaluation period.

WFB's record of opening and closing branches in the Los Angeles-Long Beach-Glendale MD is excellent. WFB has improved the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened 19 and closed 32 branches throughout the AA resulting in a net gain of one branch in a moderate-income

geography and net loss of 14 branches in upper-income geographies during the evaluation period.

WFB's record of opening and closing branches in the Oakland-Fremont-Hayward MD is adequate. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened three and closed 14 branches throughout the AA resulting in a net loss of one branch in a moderate-income geography, seven branches in middle-income geographies, and three branches in upper-income geographies.

WFB's record of opening and closing branches in the Riverside-San Bernardino-Ontario MSA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened six and closed 20 branches throughout the AA resulting in a net loss of one branch in a low-income geography, four branches in moderate-income geographies, five branches in middle-income geographies, and four branches in upper-income geographies. The majority of the closings were to consolidate redundant branches of the former Wachovia Bank branch network.

WFB's record of opening and closing branches in the San Francisco-San Mateo-Redwood City MD is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened three and closed 19 branches throughout the AA resulting in a net loss of three branches in low-income geographies, one branch in a moderate-income geography, five branches in middle-income geographies, and one branch in an upper-income geography. The majority of the closings were to consolidate redundant branches of the former Wachovia Bank branch network.

WFB's record of opening and closing branches in the Santa Ana-Anaheim-Irvine MD is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened four and closed 29 branches throughout the AA resulting in a net loss of one branch in a low-income geography, three branches in moderate-income geographies, nine branches in middle-income geographies, and twelve branches in upper-income geographies. The majority of the closings were to consolidate redundant branches of the former Wachovia Bank branch network.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are good and do not vary in a way that inconveniences certain portions of its California full-scope AAs, particularly low- and moderate-income geographies and individuals.

In the Fresno MSA, WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Fresno MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours compared to 91 percent of branches located in middle- and upper-income geographies.

In the Los Angeles-Long Beach-Glendale MD, WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Los Angeles-Long Beach-Glendale MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 94 percent of branches maintained Saturday hours compared to 91 percent of branches located in middle- and upper-income geographies.

In the Oakland-Fremont-Hayward MD, WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Oakland-Fremont-Hayward MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 94 percent of branches located in those geographies maintained Saturday hours compared to 91 percent of branches located in middle- and upper-income geographies.

In the Riverside-San Bernardino-Ontario MSA, WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Riverside-San Bernardino-Ontario MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours compared to 98 percent of branches located in middle- and upper-income geographies.

In the San Francisco-San Mateo-Redwood City MD, WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the San Francisco-San Mateo-Redwood City MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, eighty six percent of branches located in those geographies maintained Saturday hours compared to 93 percent of branches located in middle- and upper-income geographies.

In the Santa Ana-Anaheim-Irvine MD, WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Santa Ana-Anaheim-Irvine MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 90 percent of branches located in those geographies

maintained Saturday hours compared to 92 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provides an excellent level of CD services in California full-scope AAs.

In the Fresno MSA, WFB is a leader in providing CD services. WFB employees provided a total of 764 hours of CD services. These hours represented 151 CD service activities that benefited 31 different organizations and amounted to almost 12 hours of CD services per branch per year. Of these CD service activities, 5.30 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Fresno MSA include the following:

- A WFB employee is on the board of directors of a Small Business Development Corporation. The organization is focused on making loans and microloans to businesses that do not qualify for traditional bank financing including many minority-owned and disadvantaged businesses.

In the Los Angeles-Long Beach-Glendale MD, WFB provides a relatively high level of CD services. WFB employees provided a total of 2,947 hours of CD services. These hours represented 587 CD service activities that benefited 157 different organizations and amounted to almost three hours of CD services per branch per year. Of these CD service activities, 6.1 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Los Angeles-Long Beach-Glendale MD include the following:

- A WFB employee provides financial expertise and counseling to low- and moderate-income families and individuals to strengthen their financial literacy in budgeting and saving, and to provide assistance improve their current financial situation.
- A WFB employee serves on the board of directors for a CD Corporation with a mission to improve the lives of individuals and families through culturally sensitive social services and strengthen neighborhoods through housing and CD. WFB also provides grants and investments to this organization.

In the Oakland-Fremont-Hayward MD, WFB is a leader in providing CD services. WFB employees provided a total of 1,553 hours of CD services. These hours represented 467 CD service activities that benefited 90 different organizations and amounted to more than four and a half hours of CD services per branch per year. Twenty-seven percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Oakland-Fremont-Hayward MD include the following:

- WFB employees participated in Oakland Home Preservation Workshops targeting local borrowers from the Greater Bay Area that are in homeownership distress. The workshop is in collaboration with a local organization that was founded by local leaders in North Richmond working to eliminate blight, improve housing opportunities for current and future residents, and create better economic conditions.
- WFB employees work with one of the oldest and most productive non-profit affordable housing developers in California. The developer's mission is to build and maintain high-quality, well-managed, service-enhanced affordable housing communities that meet the needs of very low-, low- and moderate-income families, seniors and persons with disabilities. WFB employees provided financial literacy training to the residents of the developer's projects throughout the AA.

In the Riverside-San Bernardino-Ontario MSA, WFB provides an adequate level of CD services. WFB employees provided a total of 721 hours of CD services. These hours represented 186 CD service activities that benefited 151 different organizations and amounted to slightly less than two hours of CD service per branch per store. Of these CD service activities, 5.9 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Riverside-San Bernardino-Ontario MSA include the following:

- WFB employees provided financial literacy training in partnership with an award-winning non-profit housing development corporation dedicated to helping low- and very low-income families improve their living conditions through advocacy, research, construction, and operation of housing and CD projects.
- A WFB employee works with a partnership of non-profit, government, and business leaders committed to promoting and preserving the dream of home ownership through outreach, education, counseling, and financing provided training on the HARP home loan program.

In the San Francisco-San Mateo-Redwood City MD, WFB is a leader in providing CD services. WFB employees provided a total of 2,165 hours of CD services. These hours represented 762 CD service activities that benefited 162 different organizations and amounted to slightly more than six hours of CD services per branch per year. Nine percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the San Francisco-San Mateo-Redwood City MD include the following:

- A WFB employee provides guidance on financial matters to the board of directors of a CD organization serving as neighborhood advocates, organizers, planners, and developers and managers of affordable housing for inner city San Francisco neighborhoods such as Chinatown and the Tenderloin.
- A WFB employee serves on the board of directors and provides guidance on financial matters for an educational and training institution that also offers career counseling and job placement services to help their clients launch new careers and break out of the community's existing cycle of poverty, low education levels, homelessness, drugs, crime, and prison. The institution helps low-income individuals move toward a better life for themselves and their families.

In the Santa Ana-Anaheim-Irvine MD, WFB is a leader in providing CD services. WFB employees provided a total of 2,213 hours of CD services. These hours represented 837 CD service activities that benefited 126 different organizations and amounted to almost five hours of CD services per branch per year. Of the CD service activities, 11.7 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Santa Ana-Anaheim-Irvine MD include the following:

- A WFB employee conducted financial education classes for the Life Skills portion of training at a non-profit that helps low-income youth with job training.
- WFB employees provided financial literacy classes at various venues in partnership with Neighborhood Housing Services of Orange County. The mission of the Neighborhood Housing Services of Orange County is to develop and finance affordable housing and strengthen neighborhoods in partnership with residents, local government, financial institutions, and the business community.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the San Diego-Carlsbad-San Marcos, San Jose-Sunnyvale-Santa Clara, Santa Rosa-Petaluma, and Stockton MSAs and Central Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in California. Performance under the Service Test in El Centro, Hanford-Corcoran, Madera-Chowchilla, Merced, Modesto, Napa, San Luis Obispo-Paso Robles, Santa Cruz-Watsonville, Vallejo-Fairfield, Visalia-Porterville, and Yuba City MSAs and the Northern California and Truckee-Grass Valley Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in California. Performance

under the Service Test in Chico, Oxnard-Thousand Oaks-Ventura, Redding, Sacramento-Arden-Arcade-Roseville, Santa Barbara-Santa Maria-Goleta, and Salinas MSAs and the Eastern Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in California. Performance in limited-scope areas did not influence the Service Test performance in California.

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

## State of Colorado Rating

**CRA Rating for the State<sup>2</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 the following:

- WFB's lending levels reflect excellent responsiveness to credit needs of its full-scope Colorado AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Colorado AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Colorado AA.
- CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants within its full-scope Colorado AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope Colorado AA.
- WFB's record of opening and closing branches has adversely affected the accessibility of its delivery systems within its full-scope Colorado AAs.

## Description of Institution's Operations in the State of Colorado

Of the bank's 54 state and multistate rating areas, Colorado ranks tenth and accounts for 2.9 percent of total bank deposits, or \$24.7 billion as of June 30, 2012. WFB has 11 defined AAs in Colorado, which include 34 out of the 64 total counties in the state. Within the state, WFB operates 169 branches. WFB is the largest banking institution in Colorado with 24.8 percent of the deposit market share. Primary competitors include First Bank and US Bank, NA, with deposit market shares of 10.6 percent and 9.7 percent, respectively.

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<sup>2</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation does not reflect performance in the parts of this state contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

## **Scope of Evaluation in the State of Colorado**

Of WFB's 11 AAs in Colorado, the Denver-Aurora-Broomfield MSA is selected for full-scope review. This MSA accounts for 65.5 percent of the bank's state deposits and is the most significant AA in the state.

Refer to the market profile for the Denver-Aurora-Broomfield MSA 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 Colorado is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Denver-Aurora-Broomfield MSA is good.

### **Lending Activity**

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the Colorado full-scope AA is good.

WFB's lending activity in the Denver-Aurora-Broomfield MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

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

Geographic distribution of loans in the Colorado full-scope AA is good. We revised our conclusions to reflect performance context factors identified in the Denver-Aurora-Broomfield MSA. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

WFB's distribution of home purchase loans by income level of the geography in the Denver-Aurora-Broomfield MSA is good. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Denver-Aurora-Broomfield MSA is good. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Denver-Aurora-Broomfield MSA is poor. Its distribution of loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is below its overall market share. WFB's distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's geographic distribution of small loans to businesses in the Denver-Aurora-Broomfield MSA is good. The bank's distribution of small loans to businesses in low-income geographies is reasonably near the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is somewhat lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in

moderate-income geographies is reasonably near its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Colorado section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

WFB's geographic distribution of small loans to farms in the Denver-Aurora-Broomfield MSA is poor. WFB's distribution of small loans to farms in low-income geographies is somewhat lower than the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies is significantly lower than its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is significantly lower than the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in the Colorado full-scope AA is good.

### ***Home Mortgage Loans***

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

WFB's distribution of home purchase loans by income level of the borrower in the Denver-Aurora-Broomfield MSA is excellent. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Denver-Aurora-Broomfield MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the

percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Denver-Aurora-Broomfield MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Denver-Aurora-Broomfield MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Colorado section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

WFB's distribution of small loans to farms based on the revenue size of the farm in the Denver-Aurora-Broomfield MSA is good. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is reasonably near the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## **CD Lending**

Refer to Table 1 in the Colorado section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic

lending data on all multifamily loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans.

The volume and nature of the bank's CD lending had a significantly positive effect on performance in the Colorado full-scope AA.

The volume and nature of WFB's CD lending had a significantly positive affect on Lending Test performance in the Denver-Aurora-Broomfield MSA. During the evaluation period, the bank originated 56 CD loans totaling \$235 million and equal to 12.8 percent of allocated Tier 1 Capital.

Thirty percent of the these loans were targeted to affordable housing, 5 percent to stabilization and revitalization efforts, 38 percent to community services, and 27 percent to economic development needs identified in the Denver-Aurora-Broomfield MSA. Sixty-six percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Denver-Aurora-Broomfield MSA include the following:

- In August 2010, WFB provided a \$15.7 million loan for the purpose of providing construction financing for the rehabilitation of a 184-unit affordable LIHTC housing development located in a low-income area of Denver, Colorado. This limited liability partnership is an affiliate of an organization that was created in 1938 for the express purpose of housing low- and moderate-income families, and a mission to serve the residents of Denver by developing, owning, and operating safe, decent, and affordable housing in a manner that promotes thriving communities.
- In August 2011, WFB provided a \$6.4 million loan for the purpose of funding the construction of a 50-unit LIHTC senior housing complex located in Golden, Colorado. Occupancy is restricted to low- and moderate-income families or persons.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Colorado Springs and Fort Collins-Loveland MSAs is not inconsistent with the bank's overall **Outstanding** performance under the Lending Test in Colorado. In the Boulder, Grand Junction, Greeley, and Pueblo MSAs and the Canon City, Sterling-Fort Morgan, Western Colorado, and Durango Non-Metropolitan AAs performance is weaker than the bank's overall **Outstanding** performance in the state. Performance in the limited-scope AAs did not influence the Lending Test rating in Colorado.

Refer to the Tables 1 through 13 in the Colorado section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Colorado is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Denver-Aurora-Broomfield MSA is excellent.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB has one ongoing qualified investment originated in prior periods for \$150,000 that provides continuing benefit to the entire state. The prior period statewide investment represents less than one percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating was minimal.

### Conclusions for Areas Receiving Full-Scope Reviews

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

WFB's Investment Test performance in the Denver-Aurora-Broomfield MSA is excellent. During the evaluation period, the bank made 161 grants and qualified investments totaling \$84.6 million that are equal to 4.6 percent of allocated Tier 1 Capital. The total included 91 grants and contributions worth \$2.2 million. WFB has 34 ongoing qualified investments originated in prior periods that total 53.4 million, are equal to 2.9 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing and economic development. The affordable housing needs are predominately met through WFB's investments in mortgage-backed securities and national LIHTC funds. Investments during the current evaluation periods have created over 529 units of affordable housing in the Denver-Aurora-Broomfield MSA.

Examples of significant investments made in the Denver-Aurora-Broomfield MSA during the evaluation period are:

- In May 2009, WFB invested \$750,000 through an EQ2 in an organization in Westminster, Colorado, that promotes affordable housing for low- and moderate-income individuals through property development using the Self Help model, affordable mortgage financing, homebuyer education, and technical assistance. WFB's investment is used to support a program for the organization to purchase foreclosed homes and rehab them with its clients. Once completed, the organization offers a two-year lease-to-own option to the clients. Specifically, WFB funds will be

used to finance the acquisition and rehab of these homes. Targeted households will be those earning 80 percent or less of the area median income.

- In July 2011, WFB invested \$10.4 million in Lewis Court Apartments located in Golden, Colorado. This tax credit project will provide 50 newly constructed units of housing restricted to low- and moderate-income seniors age 55 and over. The developer on the project has a mission to provide affordable housing throughout Jefferson County to the greatest number of eligible people in the most efficient and cost effective manner.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Fort Collins-Loveland, Greeley, and Pueblo MSAs is not inconsistent with the bank's overall **Outstanding** performance under the Investment Test in Colorado. The bank's performance in the Boulder, Grand Junction, and Colorado Springs MSAs and the Western Colorado, Canyon City, Durango, and Sterling-Fort Morgan Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance under the Investment Test for Colorado. Performance in the limited-scope AAs did not influence the Investment Test rating in Colorado. Refer to Table 14 in the 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 the state of Colorado is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Denver-Aurora-Broomfield MSA is good.

### Retail Banking Services

Refer to Table 15 in the 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.

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in the Colorado full-scope AA is excellent.

In the Denver-Aurora-Broomfield MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering 12 middle- and upper-income branch locations that are in close proximity to four low- and eight moderate-income geographies, accessibility improves in low- and moderate-income geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Colorado full-scope AA is adequate and has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Denver-Aurora-Broomfield MSA is adequate. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB closed ten branches throughout the AA resulting in a net loss of one branch in low-income geographies, four branches in moderate-income geographies, three branches in middle-income geographies, and two branches in upper-income geographies during the evaluation period. The majority of the closings did not affect accessibility because they were to consolidate redundant branches acquired from the former Wachovia Bank.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours do not vary in a way that inconveniences portions of the Colorado full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Denver-Aurora-Broomfield MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 95 percent of branches located in those geographies maintained Saturday hours compared to 90 percent of branches located in middle- and upper-income geographies.

### ***CD Services***

WFB provided an excellent level of CD services in the Colorado full-scope AA.

In the Denver-Aurora-Broomfield MSA, WFB is a leader in providing CD services. WFB employees provided a total of 1,938 hours of CD services. These hours represented 237 CD service activities that benefited 205 different organizations and amounted to more than five hours of CD services per branch per year. Fifty-nine percent of the CD service activities were considered highly responsive to identified community needs. Highlights of WFB's CD services that benefited the Denver-Aurora-Broomfield MSA include the following:

- A WFB employee is on the board of directors of a Housing Development Corporation. The organization a U.S. Department of Housing and Urban Development (HUD) Housing Counseling Agency and a member of NeighborWorks® America.
- A WFB employee is on the board of directors of a non-profit CD financial institution founded in 1976 to help small businesses. The organization provides small business loans up to \$250,000 to entrepreneurs who are unable to obtain financing from traditional sources. The organization provides management consulting and business training.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Colorado Springs MSA and the Canon City and Durango Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in Colorado. Performance under the Service Test in Grand Junction, Greeley, and Pueblo MSAs and the Sterling-Fort Morgan and Western Colorado Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Colorado. Performance under the Service Test in Boulder and Fort Collins-Loveland MSAs is weaker than the bank's overall **High Satisfactory** performance in Colorado. Performance in limited-scope areas did not influence the Service Test performance in Colorado.

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

## State of Florida Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of WFB's full-scope Florida AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Florida AAs.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Florida AAs.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has a significant level of qualified CD investments and grants within its full-scope Florida AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Florida AAs.
- WFB provides a relatively high level of CD services within its full-scope Florida AAs.

### Description of Institution's Operations in the State of Florida

Of the bank's 54 state and multistate rating areas, Florida ranks fourth and accounts for \$69 billion or 8.1 percent of total bank deposits as of June 30, 2012. WFB has 27 defined AAs in Florida. The AAs are made up of 50 of the 67 total counties in the state. Within the state, WFB operates 645 branches. WFB is the second largest banking institution in Florida with 16.3 percent of the deposit market share. Primary competitors include Bank of America, NA and SunTrust Bank, with deposit market shares of 18.3 percent and 10.1 percent, respectively.

Because WFB's branches in Florida have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of Florida

Of WFB's 27 AAs in Florida, the Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater MSAs and the Fort Lauderdale-Pompano Beach-Deerfield Beach, Miami-Miami Beach-Kendall, and West Palm Beach-Boca Raton-Boynton Beach MDs were selected for full-scope review. These MSAs and MDs account for 67 percent of the bank's state deposits and are the most significant AAs in the state.

Refer to the market profile for the Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater MSAs and the Fort Lauderdale-Pompano Beach-Deerfield Beach, Miami-Miami Beach-Kendall, and West Palm Beach-Boca Raton-Boynton Beach MDs 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 Florida is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach and Miami-Miami Beach-Kendall MDs and Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater MSAs is excellent and in the West Palm Beach-Boca Raton-Boynton Beach MD is good.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in Florida full-scope AAs is excellent.

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: WFB's lending activity in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of MSA deposits.

Miami-Miami Beach-Kendall MD: WFB's lending activity in the Miami-Miami Beach-Kendall MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of MSA deposits. We

considered the strong competition from several non-deposit-taking lenders in our lending activity assessment.

Orlando-Kissimmee-Sanford MSA: WFB's lending activity in the Orlando-Kissimmee-Sanford MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to farms is equal to or exceeded its ranking or percentage market share of MSA deposits. WFB's ranking for small loans to businesses is reasonably near its rank in share of MSA deposits.

Tampa-St. Petersburg-Clearwater MSA: WFB's lending activity in the Tampa-St. Petersburg-Clearwater MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to farms is equal to or exceeded its ranking or percentage market share of MSA deposits. WFB's ranking for small loans to businesses is reasonably near its rank in share of MSA deposits.

West Palm Beach-Boca Raton-Boynton Beach MD: WFB's lending activity in the West Palm Beach-Boca Raton-Boynton Beach MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of MSA deposits.

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

Distribution of loans by income level of the geography in the Florida full-scope AAs is good. We revised our conclusions to reflect performance context factors identified in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Miami-Miami Beach-Kendall, and West Palm Beach-Boca Raton-Boynton Beach MDs and Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater MSAs. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: WFB's geographic distribution of home purchase loans by income level in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is good. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall

market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is good. Its distribution of loans in low-income geographies approximates the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is adequate. Its distribution of loans in low-income geographies is lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to extremely severe economic and demographic conditions discussed in the Pompano Beach-Deerfield Beach MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is now considered good as a result of these performance context factors.

Miami-Miami Beach-Kendall MD: WFB's geographic distribution of home purchase loans by income level in the Miami-Miami Beach-Kendall MD is good. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Miami-Miami Beach-Kendall MD is good. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is reasonably near its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Miami-Miami Beach-Kendall MD is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to extremely severe economic and demographic conditions discussed in the Miami-Miami Beach-Kendall MD Market Profile, we determined that the distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered poor for low-income geographies and adequate for moderate-income geographies. WFB's geographic distribution of home refinance loans by income level in the Miami-Miami Beach-Kendall MD was revised and is now considered adequate as a result of these performance context factors.

Orlando-Kissimmee-Sanford MSA: WFB's geographic distribution of home purchase loans by income level in the Orlando-Kissimmee-Sanford MSA is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Orlando-Kissimmee-Sanford MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low-income

geographies should be considered adequate. WFB's geographic distribution of home purchase loans by income level in the Orlando-Kissimmee-Sanford MSA was revised and is now considered adequate as a result of these performance context factors.

WFB's geographic distribution of home improvement loans by income level in the Orlando-Kissimmee-Sanford MSA is adequate. Its distribution of loans in low-income geographies is lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is reasonably near the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is below its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Orlando-Kissimmee-Sanford MSA is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to extremely severe economic and demographic conditions discussed in the Orlando-Kissimmee-Sanford MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Orlando-Kissimmee-Sanford MSA was revised and is now considered good as a result of these performance context factors.

Tampa-St. Petersburg-Clearwater MSA: WFB's geographic distribution of home purchase loans by income level in the Tampa-St. Petersburg-Clearwater MSA is adequate. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share. WFB's geographic distribution of home improvement loans by income level in the Tampa-St. Petersburg-Clearwater MSA is adequate. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in

low-income geographies. WFB's market share of home improvement loans in low-income geographies is below its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is reasonably near the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies substantially meets its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Tampa-St. Petersburg-Clearwater MSA is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies substantially meets its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to extremely severe economic and demographic conditions discussed in the Tampa-St. Petersburg-Clearwater MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Tampa-St. Petersburg-Clearwater MSA was revised and is now considered good as a result of these performance context factors.

West Palm Beach-Boca Raton-Boynton Beach MD: WFB's geographic distribution of home purchase loans by income level in the West Palm Beach-Boca Raton-Boynton Beach MD is good. Its distribution of loans in low-income geographies is somewhat lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home improvement loans by income level in the West Palm Beach-Boca Raton-Boynton Beach MD is good. Its distribution of loans in low-income geographies exceeds the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies.

WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the West Palm Beach-Boca Raton-Boynton Beach MD is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to extremely severe economic and demographic conditions discussed in the West Palm Beach-Boca Raton-Boynton Beach MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the West Palm Beach-Boca Raton-Boynton Beach MD was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

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

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: WFB's geographic distribution of small loans to businesses in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is excellent. The bank's distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

Miami-Miami Beach-Kendall MD: WFB's geographic distribution of small loans to businesses in the Miami-Miami Beach-Kendall MD is good. The bank's distribution of small loans to businesses in low-income geographies is reasonably near the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-

income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Orlando-Kissimmee-Sanford MSA: WFB's geographic distribution of small loans to businesses in the Orlando-Kissimmee-Sanford MSA is good. The bank's distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

Tampa-St. Petersburg-Clearwater MSA: WFB's geographic distribution of small loans to businesses in the Tampa-St. Petersburg-Clearwater MSA is excellent. The bank's distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

West Palm Beach-Boca Raton-Boynton Beach MD: WFB's geographic distribution of small loans to businesses in the West Palm Beach-Boca Raton-Boynton Beach MD is excellent. The bank's distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds the overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies exceeds the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Florida section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Miami-Miami Beach-Kendall, and West Palm Beach-Boca Raton-Boynton Beach MDs and Orlando-Kissimmee-Sanford, FL and Tampa-St. Petersburg-Clearwater MSAs because the number of loans originated in the AAs were insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

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

Distribution of loans by income level of the borrower in Florida full-scope AAs is good. We revised our conclusions to reflect performance context factors identified in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Miami-Miami Beach-Kendall, and West Palm Beach-Boca Raton-Boynton Beach MDs and Orlando-Kissimmee-Sanford MSA. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is excellent. Its distribution of loans to low-income borrowers is near to the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is below its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers approximates the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income

borrowers is significantly lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered adequate. WFB's borrower distribution of home refinance loans by income level of the borrower in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD was revised and is now considered adequate as a result of these performance context factors.

Miami-Miami Beach-Kendall MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Miami-Miami Beach-Kendall MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Miami-Miami Beach-Kendall MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is significantly lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Miami-Miami Beach-Kendall MD is very poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is significantly lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is significantly lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the

Miami-Miami Beach-Kendall MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered poor. WFB's borrower distribution of home refinance loans by income level of the borrower in the Miami-Miami Beach-Kendall MD was revised and is now considered poor as a result of these performance context factors.

Orlando-Kissimmee-Sanford MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Orlando-Kissimmee-Sanford MSA is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the Orlando-Kissimmee-Sanford MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of low-income borrowers should be considered good. WFB's borrower distribution of home purchase loans by income level of the borrower in the Orlando-Kissimmee-Sanford MSA was revised and is now considered excellent as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Orlando-Kissimmee-Sanford MSA is excellent. Its distribution of loans to low-income borrowers is near to the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Orlando-Kissimmee-Sanford MSA is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is below its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

Tampa-St. Petersburg-Clearwater MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Tampa-St. Petersburg-Clearwater MSA is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase

loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Tampa-St. Petersburg-Clearwater MSA is excellent. Its distribution of loans to low-income borrowers is less than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Tampa-St. Petersburg-Clearwater MSA is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

West Palm Beach-Boca Raton-Boynton Beach MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the West Palm Beach-Boca Raton-Boynton Beach MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the West Palm Beach-Boca Raton-Boynton Beach MD Market Profile, we determined that distribution of home purchase loans compared to the percent of low-income borrowers should be considered good. WFB's borrower distribution of home purchase loans by income level of the borrower in the West Palm Beach-Boca Raton-Boynton Beach MD was revised and is now considered excellent as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the West Palm Beach-Boca Raton-Boynton Beach MD is excellent. Its distribution of loans to low-income borrowers is reasonably near the percent of low-

income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the West Palm Beach-Boca Raton-Boynton Beach MD is poor. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to extremely severe economic and demographic conditions discussed in the West Palm Beach-Boca Raton-Boynton Beach MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered adequate. WFB's borrower distribution of home refinance loans by income level of the borrower in the West Palm Beach-Boca Raton-Boynton Beach MD was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

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

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Miami-Miami Beach-Kendall MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Miami-Miami Beach-Kendall MD is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Orlando-Kissimmee-Sanford MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Orlando-Kissimmee-Sanford MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Tampa-St. Petersburg-Clearwater MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Tampa-St. Petersburg-Clearwater MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

West Palm Beach-Boca Raton-Boynton Beach MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the West Palm Beach-Boca Raton-Boynton Beach MD is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Florida section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

We did not assess borrower distribution of small loans to farms in the Fort Lauderdale-Pompano Beach-Deerfield Beach, Miami-Miami Beach-Kendall, and West Palm Beach-Boca Raton-Boynton Beach MDs and Orlando-Kissimmee-Sanford, FL and Tampa-St. Petersburg-Clearwater MSAs because the number of loans originated in the AAs were insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

### **CD Lending**

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

The volume and nature of the bank's CD lending had a positive effect on lending performance in Florida full-scope AAs. Performance context issues affecting the availability of CD loans throughout the state of Florida had a significant effect on our assessment of CD lending performance. Please refer to Florida full-scope AA Market Profiles for more information. We considered the shorter evaluation period for Florida in our assessment of CD lending.

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD. During the evaluation period, the bank originated five CD loans totaling \$14.7 million and equal to 1.6 percent of allocated Tier 1 Capital.

Approximately 80 percent of these loans were targeted to affordable housing and 20 percent were targeted to economic development.

Highlights of WFB's CD lending that benefited the Fort Lauderdale-Pompano Beach-Deerfield Beach MD include the following:

- A \$4.5 million construction loan for the purpose of acquiring and constructing a 140-unit apartment development in Sunrise/Fort Lauderdale, Florida. Of the total, 112 units are rent restricted to 60 percent of area median income and 28 units are rent restricted to 28 percent of area median income.
- A \$1.02 million loan for the purpose of funding the acquisition of a larger operating facility for a small business located in Pompano Beach, Florida. The borrower specializes in addiction treatment and treatment of a variety of mental health disorders on both an inpatient and outpatient basis. This loan will allow the company to purchase a larger facility that will house 20 residential units for their inpatient program. The loan was made in conjunction with the SBA's 504 Certified Development Company program, which is a long-term financing tool for economic development within a community.

Miami-Miami Beach-Kendall MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Miami-Miami Beach-Kendall MD. During the evaluation period, the bank originated 15 CD loans totaling \$66.9 and equal to 4.3 percent of allocated Tier 1 Capital.

Approximately thirty-three percent of the loans were targeted to affordable housing, 20 percent to community services, thirty-three percent to economic development, and 14 percent to revitalization and stabilization efforts in the AA. Fifty-nine percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Miami-Miami Beach-Kendall MD include the following:

- WFB provided a \$7 million loan for the purpose of funding the construction of a new homeless shelter for a nonprofit organization located in a moderate-income census tract in Miami, Florida. This nonprofit organization has been providing humanitarian services to the indigent and homeless populations of Miami-Dade, Florida for over 50 years. They offer services that include food, shelter, housing, rehabilitative treatment, and health care for persons who are poor and homeless.
- WFB provided a \$23.4 million loan to finance the land acquisition and development of a new retail center located in a moderate-income census tract within Miami, Florida. The project is located just north of the city's Central Business District and is within an Empowerment Zone, Enterprise Zone and a Redevelopment District as designated by the Miami Community Redevelopment Agency (CRA). The CRA's mission is to improve the quality of life for residents and stakeholders within the redevelopment areas through activities and programs that create new job opportunities, substantially improve the quality of the housing stock, and improve the physical appearance of the redevelopment areas.

Orlando-Kissimmee-Sanford MSA: The volume and nature of WFB's CD lending had a positive effect on Lending Test performance in the Orlando-Kissimmee-Sanford MSA. During the evaluation period, the bank originated nine CD loans totaling \$27.6 and equal to 4.0 percent of allocated Tier 1 Capital.

Approximately 11 percent of the loans were targeted to affordable housing, 22 percent to community services, and 67 percent were to economic development. Eleven percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Orlando-Kissimmee-Sanford MSA include the following:

- WFB provided a \$500,000 loan to fund construction costs for a food bank located in a moderate-income census tract within Orlando, Florida. This nonprofit organization has a mission to fight hunger in Central Florida. They accomplish this by collecting, storing and distributing donated food to more than 500 partner agencies in six Central Florida counties: Brevard, Lake, Orange, Osceola, Seminole and Volusia.
- WFB renewed a \$400,000 working capital line of credit for a nonprofit organization located in Winter Park, Florida. This nonprofit organization, established in 1960, provides developmental preschool and childcare services, including medical

rehabilitation that encompasses early intervention, physical therapy, occupational therapy, speech and hearing therapy, job training, childcare, adult day services, camping, and recreation.

Tampa-St. Petersburg-Clearwater MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Tampa-St. Petersburg-Clearwater MSA. During the evaluation period, the bank originated 11 CD loans totaling \$61.3 million and equal to 5.9 percent of allocated Tier 1 Capital.

Approximately 45 percent of the loans were targeted to affordable housing, 28 percent to community services, and 27 percent to efforts to revitalize and stabilize the AA. Thirty-one percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance.

Highlights of WFB's CD lending that benefited the Tampa-St. Petersburg-Clearwater MSA include the following:

- WFB made a loan in the amount of \$15.1 million to a non-profit organization in Tampa, Florida. The funds were used for the construction of a new operating facility that was designed to house a majority of their programs under one roof in order to operate more efficiently. The organization provides drug abuse planning, coordination and monitoring for local governmental units.
- WFB provided a \$2.4 million loan for the purpose of acquiring and renovating a 232-unit LIHTC apartment complex in Palm Harbor, Florida. Fifty-eight of the units will be restricted to tenants earning 60 percent or below the area's median family income. This limited liability limited partnership is affiliated with a company that specializes in the acquisition and renovation of apartment projects in Florida, Texas, South Carolina and Tennessee. This particular project is a 232-unit LIHTC apartment complex. Twelve of the units will be restricted to tenants earning 50 percent or below the area's median family income and 46 of the units will be restricted to tenants earning 60 percent or below the area's median family income.

West Palm Beach-Boca Raton-Boynton Beach MD: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the West Palm Beach-Boca Raton-Boynton Beach MD. During the evaluation period, the bank originated four CD loans totaling \$5.1 million and equal to 0.5 percent of allocated Tier 1 Capital.

Approximately 50 percent of these loans were targeted to affordable housing, 25 percent were targeted to community service and another 25 percent were targeted economic development.

Highlights of WFB's CD lending that benefited the West Palm Beach-Boca Raton-Boynton Beach MD include the following:

- WFB provided a \$200,000 working capital line of credit to a nonprofit affordable housing developer located in a low-income census tract in Delray Beach, Florida. This nonprofit organization was formed in April 1991 to provide affordable housing for low-income families by working in partnership with those families.
- WFB renewed a \$300,000 working capital line of credit for a nonprofit organization located in a moderate-income census tract in Palm Beach Gardens, Florida. This nonprofit organization was formed in 1982 to improve the health of the residents of the Palm Beaches and the Treasure Coast by promoting access to affordable, quality health and human services.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Cape Coral-Fort Myers, Crestview-Fort Walton Beach-Destin, Deltona-Daytona Beach-Ormond Beach, Gainesville, Jacksonville, Lakeland-Winter Haven, Naples-Marco Island, North Port-Bradenton-Sarasota, Ocala, Palm Coast, Palm Bay-Melbourne-Titusville, Panama City-Lynn Haven-Panama City Beach, Pensacola-Ferry Pass-Brent, Port St Lucie, Punta Gorda, Sebastian-Vero Beach, and Tallahassee MSAs and the Citrus-Sumter, DeSoto-Highlands, Madison-Taylor, Monroe County, and Panhandle Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance under the Lending Test in Florida. Performance in the limited-scope AAs did not influence the Lending Test rating in Florida. Refer to the Tables 1 through 13 in the Florida section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Florida is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Miami-Miami Beach-Kendall MD and the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is excellent and in the Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater MSAs and West Palm Beach-Boca Raton-Boynton Beach MD is good.

We considered the shorter evaluation period for Florida in our assessment of CD Investments. We also considered performance context factors affecting the level of CD investment opportunities during the evaluation period. Conclusions regarding the level of investment and grant activity took into consideration the significant reduction in CD investment opportunities in the Florida during the evaluation period due to the recession and budget shortfalls at the state and local levels.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two investments totaling \$750,000 that benefited the entire state during the evaluation period. The effect on the overall state rating was minimal.

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

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

Fort Lauderdale-Pompano Beach-Deerfield Beach MD: WFB's Investment Test performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is excellent. During the evaluation period, the bank made 57 grants and qualified investments totaling \$31.8 million that are equal to 3.5 percent of allocated Tier 1 Capital. The total included three grants and contributions worth \$155,000. WFB has four ongoing qualified investments originated in prior periods that total \$16.9 million that are equal to 1.9 percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the need for affordable housing. Investments during the current period have created over 450 units of affordable housing in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD.

Examples of significant investments made in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD during the evaluation period are:

- WFB invested \$17.3 million in a new construction, affordable housing development located in Sunrise, Florida. The LIHTC project provided 140 units of critically needed workforce rental housing and targets families with incomes ranging from 28 to 60 percent of the Area Median Income.
- WFB invested \$300,000 in a nonprofit developer in Fort Lauderdale, Florida. Structured as an EQ2, the investment was used as predevelopment working capital for developing additional housing for low-income seniors.

Miami-Miami Beach-Kendall MD: WFB's Investment Test performance in the Miami-Miami Beach-Kendall MD is excellent. During the evaluation period, the bank made 78 grants and qualified investments totaling \$117.8 million that are equal to 7.5 percent of allocated Tier 1 Capital. The total included five grants and contributions worth \$8.3 million. WFB has eight ongoing qualified investments originated in prior periods that total \$76.1 million, are equal to 4.8 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need of

affordable housing. Investments during the current period have created over 936 units of affordable housing in the Miami-Miami Beach-Kendall MD.

Examples of significant investments made in the Miami-Miami Beach-Kendall MD during the evaluation period are:

- WFB invested \$19.0 million for the construction of the Amistad Apartments, an 89-unit multi-family affordable apartment high-rise located in the Little Havana neighborhood of Miami, Florida. The property is being developed in a redeveloping urban neighborhood that is attracting both market rate and commercial development. Nine of the units will be reserved for previously homeless tenants earning 28 percent of the area median income, 36 units will be reserved for previously homeless tenants earning 60 percent of the area median income, and the remaining 44 units will be reserved for tenants earning 60 percent of the area median income.
- WFB invested \$10.8 million for the rehabilitation of the Mildred and Claude Pepper Towers in Miami, Florida. This project will provide 150 units of housing for seniors, 15 units will be restricted to tenants earning 33 percent of the Area Median Income and 135 units will be restricted to tenants earning 60 percent of the Area Median Income.

Orlando-Kissimmee-Sanford MSA: WFB's Investment Test performance in the Orlando-Kissimmee-Sanford MS is good. During the evaluation period, the bank made 98 grants and qualified investments totaling \$22.9 million that are equal to 3.3 percent of allocated Tier 1 Capital. The total included seven grants and contributions worth \$5.6 million. WFB has two ongoing qualified investments originated in prior periods that total \$424,000 that are equal to 0.1 percent of allocated Tier 1 Capital and provide continuing benefit to the community. WFB's investments exhibit excellent responsiveness to credit and community economic development needs. The investments in this AA address a number of identified needs, notably affordable housing and community service.

Examples of significant investments made in the Orlando-Kissimmee-Sanford MSA during the evaluation period are:

- WFB invested \$14.75 million in a food bank for a NMTC project located in Orlando, Florida. This investment was used to construct a new 95,726 square foot food distribution center. The new facility will replace the organization's existing antiquated facility and will include executive office space, an extensive kitchen/training facility, plus cold storage space, all of which will greatly increase the food bank's distribution capacity and to better serve over 500 agency partners. The new facility will allow the food bank to take in over three million pounds of additional food annually.
- WFB invested a total of \$17.3 million in a Fannie Mae Mortgage-Backed Security bond. The underlying mortgages were made to low- and moderate-income

borrowers. Of this total investment, \$605,000 directly benefited the Orlando-Kissimmee-Sanford MSA.

Tampa-St. Petersburg-Clearwater MSA: WFB's Investment Test performance in the Tampa-St. Petersburg-Clearwater MSA is good. During the evaluation period, the bank made 128 grants and qualified investments totaling \$33.5 million that are equal to 3.3 percent of allocated Tier 1 Capital. The total included four grants and contributions worth \$5.6 million. WFB has four ongoing qualified investments originated in prior periods that total \$2.5 million that are equal to 0.2 percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified needs for affordable housing. Investments during the current evaluation period have created over 108 units of affordable housing in the Tampa-St. Petersburg-Clearwater MSA.

Examples of significant investments made in the Tampa-St. Petersburg-Clearwater MSA during the evaluation period are:

- WFB invested \$7.6 million in a 62-unit affordable housing project in Tarpon Springs, Florida. Seven units will be restricted to tenants earning 35 percent of the Area Median Income and 55 units will be restricted to tenants earning 60 percent of the Area Median Income.
- WFB invested \$7.6 million in Brook Haven, Ltd., an affordable housing project located in Brooksville, Florida. This project was part of a \$38 million investment in the Richman Group's U.S.A. Institutional Tax Credit Fund LII, a low-income housing tax credit fund.

West Palm Beach-Boca Raton-Boynton Beach MD: WFB's Investment Test performance in the West Palm Beach-Boca Raton-Boynton Beach MD is good. During the evaluation period, the bank made 87 grants and qualified investments totaling \$18.2 million that are equal to 1.9 percent of allocated Tier 1 Capital. The total included two grants and contributions worth \$120,000. WFB has one ongoing qualified investment originated in prior periods that totaled \$9.3 million, is equal to 0.9 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing. Investments during the current evaluation periods have created over 413 units of affordable housing in the West Palm Beach-Boca Raton-Boynton Beach MD.

An example of a significant investment made in the West Palm Beach-Boca Raton-Boynton Beach MD during the evaluation period follows:

- WFB invested \$5 million in the Westgate Plaza Apartments, an 80-unit affordable housing project located in West Palm Beach, Florida. All of the units are restricted to renters earning 60 percent or less of AMI. This project also qualifies for low-income housing tax credits.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Tallahassee MSA is not inconsistent with the bank's overall **High Satisfactory** performance under the Investment Test in Florida. The bank's performance in the Lakeland-Winter Haven, Ocala, and Panama City-Lynn Haven-Panama City Beach MSAs and the Monroe County Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance under the Investment Test in the state of Florida. The bank's performance in the Cape Coral-Fort Myers, Gainesville, Jacksonville, Naples-Marco Island, North Port-Bradenton-Sarasota, Palm Bay-Melbourne-Titusville, Pensacola-Ferry Pass-Brent, Crestview-Fort Walton Beach-Destin, Deltona-Daytona Beach-Ormond Beach, Palm Coast, Port St Lucie, Punta Gorda, and Sebastian-Vero Beach MSAs and Citrus-Sumter, DeSoto-Highlands, Madison-Taylor, and Panhandle Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance under the Investment Test in the state of Florida. Performance in the limited-scope AAs did not influence the Investment Test rating in Florida. Refer to Table 14 in the 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 the state of Florida is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance is good in the Fort Lauderdale-Pompano Beach-Deerfield Beach and Miami-Miami Beach-Kendall MDs and excellent in the West Palm Beach-Boca Raton-Boynton Beach MD and Orlando-Kissimmee-Sanford and Tampa-St. Petersburg-Clearwater MSAs.

### Retail Banking Services

Refer to Table 15 in the 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.

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Florida full-scope AAs is good.

In the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low-income geographies is below the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when considering 12 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low-income geographies and is good. Overall distribution of branches improved and is now considered excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Miami-Miami Beach-Kendall MD, WFB's distribution of branches is good. Delivery systems are accessible to essentially all of WFB's AA.

The percentage distribution of branches in low-income geographies is well below the percentage of the population residing in these geographies and is poor. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering 14 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low-income geographies and is adequate. Overall distribution improved and is now considered good.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Orlando-Kissimmee-Sanford MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Tampa-St. Petersburg-Clearwater MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the West Palm Beach-Boca Raton-Boynton Beach MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA. The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Florida full-scope AAS is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD is good. WFB did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB opened five and closed six branches throughout the AA resulting in a net loss of one branch in an upper-income geography.

WFB's record of opening and closing branches in the Miami-Miami Beach-Kendall MD is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed five branches throughout the AA resulting in a net loss of two branches in moderate-income geographies and two branches in upper-income geographies during the evaluation period. The branch closures in moderate-income geographies were consolidations of branches that were within 1,000 feet of each other.

WFB's record of opening and closing branches in the Orlando-Kissimmee-Sanford MSA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB closed one branch throughout the AA

resulting in a net loss of one branch in a moderate-income geography during the evaluation period. Branch distribution remained excellent in spite of the closing. WFB's record of opening and closing branches in the Tampa-St. Petersburg-Clearwater MSA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened two and closed ten branches throughout the AA resulting in a net loss of one branch in a moderate-income geography, three branches in middle-income geographies, and four branches in upper-income geographies during the evaluation period. Branch distribution remained excellent in spite of the closing.

WFB's record of opening and closing branches in the West Palm Beach-Boca Raton-Boynton Beach MD is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened two and closed ten branches throughout the AA resulting in a net loss of one branch in a low-income geography, two branches in moderate-income geographies, one branch in a middle-income geography, and four branches in upper-income geographies during the evaluation period. Branch distribution remained excellent in spite of the closings.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of its full-scope AAs in the State of Florida, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 72 percent of branches located in those geographies maintained Saturday hours compared to 72 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Miami-Miami Beach-Kendall MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 87 percent of branches located in those geographies maintained Saturday hours compared to 72 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Orlando-Kissimmee-Sanford MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 56 percent of branches located in those geographies maintained Saturday

hours compared to 49 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences portions of the Tampa-St. Petersburg-Clearwater MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 83 percent of branches located in those geographies maintained Saturday hours compared to 78 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the West Palm Beach-Boca Raton-Boynton Beach MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 74 percent of branches located in those geographies maintained Saturday hours compared to 61 percent of branches located in middle- and upper-income geographies.

## **CD Services**

WFB provided a good level of CD services in Florida full-scope AAs. We considered the shorter evaluation period for Florida in our assessment of CD Services.

In the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, WFB provides an adequate level of CD services. WFB employees provided a total of 368 hours of CD services. These hours represented 114 CD service activities that benefited 70 different organizations and amounted to slightly less than two hours of CD services per branch per year. Thirty-one percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Fort Lauderdale-Pompano Beach-Deerfield Beach MD include the following:

- A WFB employee reviews loans and conducts board business matters as a member of the board of directors of a CD financial institution. The organization makes loans to underserved communities by providing loans to small business owners. They also provide small business training and education.
- WFB employees provide first-time home buyer training to clients of an organization that works in distressed and underserved neighborhoods and communities characterized by several negative social indicators, including high teen pregnancy rates, low high school graduation rates, high unemployment and the highest number of open cases for child abuse, neglect and welfare services.

In the Miami-Miami Beach-Kendall MD, WFB provides an adequate level of CD services. WFB employees provided a total of 398 hours of CD services. These hours

represented 97 CD service activities that benefited 38 different organizations and amounted to almost two and a half hours of CD services per branch per year. Thirty-two percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Miami-Miami Beach-Kendall MD include the following:

- A WFB employee is on the board of directors of an organization that supports families and individual men and women that are homeless by providing shelter, housing and food services. The team member assists with operations, budgets, financials, fundraising and governance of the organization.
- A WFB employee works on the strategic planning committee of an organization that builds empowered communities, revitalizes neighborhoods and creates affordable housing opportunities in South Florida.

In the Orlando-Kissimmee-Sanford MSA, WFB is a leader in providing CD services. WFB employees provided a total of 665 hours of CD services. These hours represented 146 CD service activities that benefited 38 different organizations and amounted to almost four and a half hours of CD services per branch per year. Twenty-seven percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Orlando-Kissimmee-Sanford MSA include the following:

- A WFB employee reviews small business loan request for micro loan programs, provides business consulting to small business, and serves on the commercial loan committee of an organization with a mission to develop and promote businesses by providing loan capital, training and education and to create an environment conducive to their development. The Certified Development Financing Institution assists businesses in building their management capacity through financial technical assistance services.
- A WFB employee serves as a member of the board of directors of an organization that provides housing and financial education to the low- to moderate-income community of Lake County Florida.

In the Tampa-St. Petersburg-Clearwater MSA, WFB is a leader in providing CD services. WFB employees provided a total of 1,022 hours of CD services. These hours represented 258 CD service activities that benefited 59 different organizations and amounted to more than four hours of CD services per branch per year. Sixty-four

percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Tampa-St. Petersburg-Clearwater MSA include the following:

- A WFB employee spoke at a Foreclosure Education Forum and presented a Hands On Banking seminar for clients of organizations that promote homeownership opportunities to low- and moderate-income income families in Pinellas and Pasco Counties.
- A WFB employee provided First Time Homebuyer training and explained the mortgage application and approval process to clients of an organization that has provided debt-related counseling to individuals and families since 1964 and is a leading national provider of credit counseling and education.

In the West Palm Beach-Boca Raton-Boynton Beach MD, WFB provides a relatively high level of CD services. WFB employees provided a total of 535 hours of CD services. These hours represented 124 CD service activities that benefited 57 different organizations and amounted to about three hours of CD service per branch per year. Six percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the West Palm Beach-Boca Raton-Boynton Beach MD include the following:

- A WFB employee is on the board of directors of an organization that is dedicated to the elimination of substandard housing by building simple, safe, and affordable homes for low-income, hardworking families who cannot qualify for a conventional mortgage.
- WFB employees provided classes in New Home Buyer Training for prospective first time homebuyers for clients of an organization that seeks to impact very low-, low-, and moderate-income residents in need of economic empowerment programs with foreclosure mitigation counseling and first time homebuyers' workshops.

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

Performance under the Service Test in Cape Coral-Fort Myers, Gainesville, and Jacksonville MSAs and Monroe County Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Florida. Performance under the Service Test in Crestview-Fort Walton Beach-Destin, Deltona-Daytona Beach-Ormond Beach, Lakeland-Winter Haven, Ocala, Pensacola-Ferry Pass-Brent, Port St Lucie, Punta Gorda, and Tallahassee MSAs and the Citrus-Sumter, DeSoto-Highlands, and

Panhandle Florida Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Florida. Performance under the Service Test in the North Port-Bradenton-Sarasota, Palm Bay-Melbourne-Titusville, Sebastian-Vero Beach, Naples-Marco Island, Palm Coast, and Panama City-Lynn Haven-Panama City Beach MSAs and the Madison-Taylor Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Florida. Performance in limited-scope areas did not influence the Service Test performance in Florida.

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

## State of Georgia Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of WFB's full-scope Georgia AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Georgia AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Georgia AA.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants within its full-scope Georgia AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope Georgia AA.

## Description of Institution's Operations in the State of Georgia

Of the bank's 54 state and multistate rating areas, Georgia ranks eighth and accounts for 3.04 percent of total bank deposits, or \$2.9 billion as of June 30, 2012. WFB has 20 defined AAs in Georgia, which includes 72 out of 159 counties in the state. Within the state, WFB operates 249 branches. WFB is the second largest banking institution in Georgia with 15 percent of the deposit market share. Primary competitors include Sun Trust Bank and Bank of America, NA with deposit market shares of 20 percent and 12.5 percent, respectively.

Because WFB's branches in Georgia have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of Georgia

Of WFB's 20 AAs in Georgia, the Atlanta-Sandy Springs-Marietta MSA was selected for full-scope review. This MSA accounts for over 86 percent of the bank's state deposits and is the most significant AA in the state.

Refer to the market profile for the Atlanta-Sandy Springs-Marietta MSA 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 Georgia is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs-Marietta MSA is good.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the Georgia full-scope AA is excellent.

WFB's lending activity in the Atlanta-Sandy Springs-Marietta MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

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

Geographic distribution of loans in the Georgia full-scope AA is adequate.

### *Home Mortgage Loans*

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

WFB's distribution of home purchase loans by income level of the geography in the Atlanta-Sandy Springs-Marietta MSA is adequate. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-

occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Atlanta-Sandy Springs-Marietta MSA is poor. Its distribution of home improvement loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Atlanta-Sandy Springs-Marietta MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Atlanta-Sandy Springs-Marietta MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Atlanta-Sandy Springs-Marietta MSA was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

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

WFB's geographic distribution of small loans to businesses by income level of the geography in the Atlanta-Sandy Springs-Marietta MSA is adequate. The bank's

distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income census is somewhat lower than its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

WFB's geographic distribution of small loans to farms by income level of the geography in the Atlanta-Sandy Springs-Marietta MSA is poor. The bank's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. Additionally, the bank's market share of small loans to farms in low-income geographies is significantly lower than its overall market share of such loans in the AA. The bank's distribution of small loans to farms in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to farms in moderate-income geographies is lower than its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in the Georgia full-scope AA is good.

### ***Home Mortgage Loans***

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

WFB's borrower distribution of home purchase loans by income level of the borrower in the Atlanta-Sandy Springs-Marietta MSA is excellent. Its distribution of loans to low-income borrowers is near to the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its

market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Atlanta-Sandy Springs-Marietta MSA is good. Its distribution of home improvement loans to low-income is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Atlanta-Sandy Springs-Marietta MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Atlanta-Sandy Springs-Marietta MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

WFB's distribution of small loans to farms based on the revenue size of the farm in the Atlanta-Sandy Springs-Marietta MSA is good. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the

percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## CD Lending

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

The volume and nature of the bank's CD lending had a neutral effect on performance in the Georgia full-scope AA. We considered the shorter evaluation period for Georgia in our assessment of CD loans.

The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Atlanta-Sandy Springs-Marietta MSA. During the evaluation period, the bank originated 21 CD loans totaling \$147.6 million and equal to 5.9 percent of allocated Tier 1 Capital.

Fifty-seven percent of these loans were targeted to affordable housing, 33 percent community services, and 10 percent to economic development needs identified in the Atlanta-Sandy Springs-Marietta MSA. Sixty-four percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Atlanta-Sandy Springs-Marietta MSA include the following:

- In August 2010, WFB extended a \$50 million line of credit for the purpose of providing working capital and operating expenses to a medical center located in a low-income census tract in Atlanta, Georgia. The borrower is a 501c3 acute care hospital located in downtown Atlanta. It is the largest provider of indigent care in the state of Georgia. Since its founding, it continues to maintain its strong commitment to the healthcare needs of the underserved while offering a full range of specialized medical services for all segments of the community. Managing more than 900,000 patient visits each year, the majority of the hospital's revenue is generated through Medicare and Medicaid reimbursement.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in Athens-Clarke County, Chattanooga, Dalton, Gainesville, Rome, Savannah, and Warner Robins MSAs and Gordon County, Jackson County, and Laurens County Non-

Metropolitan AAs the is not inconsistent with the bank's overall **High Satisfactory** performance under the Lending Test in Georgia. In the Brunswick, Hinesville-Fort Stewart, and Macon MSAs and Bulloch County, Greene County, Lumpkin County, Southern Georgian, and Sumter County Non-Metropolitan AAs, performance is weaker than the bank's overall **High Satisfactory** Lending Test performance in the state. In the Washington County Non-Metropolitan AA, performance is stronger than the bank's overall **High Satisfactory** Lending Test performance in the state. Performance in the limited-scope AAs did not influence the Lending Test rating in Georgia.

Refer to the Tables 1 through 13 in the Georgia section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Georgia is rated **Outstanding**. Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs-Marietta MSA is excellent. We considered the shorter evaluation period for Georgia in our assessment of CD investments. Performance context issues affecting the availability of CD investments throughout the state of Georgia had a significant impact on our assessment of Investment Test performance. Please refer to the Atlanta-Sandy Springs-Marietta MSA full-scope AA Market Profile for more information.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two investments totaling \$400,000 that benefited the entire state during the evaluation period. WFB has three ongoing qualified investments originated in prior periods that total \$6.9 million and provide continuing benefit to the entire state. The current and prior period statewide investments are equal to 0.3 percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating was minimal.

## Conclusions for Areas Receiving Full-Scope Reviews

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

WFB's Investment Test performance in the Atlanta-Sandy Springs-Marietta MSA is excellent. During the evaluation period, the bank made 236 grants and qualified investments totaling \$101.4 million that are equal to four percent of allocated Tier 1 Capital. The total included 190 grants and contributions worth \$12 million. WFB has 39 ongoing qualified investments originated in prior periods that total \$41.3 million, are equal to 1.6 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit excellent responsiveness to credit and community economic development needs identified in the AA. The investments in the AA address the identified need for affordable housing, community services, and revitalization and stabilization. Investments during the current evaluation period have created over 683 units of affordable housing in the Atlanta-Sandy Springs-Marietta MSA.

Examples of significant investments made in the Atlanta-Sandy Springs-Marietta MSA during the evaluation period include the following:

- In September 2012, WFB invested \$8.3 million for the purchase and rehabilitation of the Renaissance on Henderson, formerly known as Henderson Arms, a 151-unit affordable senior (62+) apartment development located in Marietta, Georgia. Of the 151 units, 145 will be LIHTC units restricted to low- and moderate-income occupants.
- In December 2010, WFB invested \$25 million for the financing of the new Dolphin Exhibit in downtown Atlanta, Georgia. The investment took the form of a NMTC. The current Dolphin Expansion and future projects will ensure that the aquarium stays competitive and able to offer the educational benefits and cultural enhancements that it offers today, as well as, all the direct and large indirect job creation/preservation.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Warner Robins MSA and the Sumter County Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance under the Investment Test in Georgia. The bank's performance in the Macon, Savannah, Athens-Clarke County, Brunswick, Gainesville, Chattanooga, Dalton, Hinesville-Fort Stewart, and Rome MSAs and the Bulloch County, Gordon County, Greene County, Laurens County, Lumpkin County, Southern Georgia, and Washington County Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance under the Investment Test for Georgia. Performance in the limited-scope AAs did not influence the Investment Test rating in Georgia.

Refer to Table 14 in the Georgia 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 state of Georgia is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Atlanta-Sandy Springs-Marietta MSA is good.

### Retail Banking Services

Refer to Table 15 in the 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.

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in the Georgia full-scope AA is excellent.

In the Atlanta-Sandy Springs-Marietta MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low-income geographies is reasonably near the percentage of the population residing in these geographies and is good. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when considering 21 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies and is excellent in low-income geographies.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

#### *Changes in Branch Location*

To the extent changes have been made, WFB's record of opening and closing branches in the Georgia full-scope AA did not affect the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals in a negative or positive way.

WFB's record of opening and closing branches in the Atlanta-Sandy Springs-Marietta MSA did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB opened one branch and closed one branch in a middle-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Georgia full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Atlanta-Sandy Springs-Marietta MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 76 percent of branches located in those geographies maintained Saturday hours compared to 62 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a poor level of CD services in the Georgia full-scope AA. We considered the shorter evaluation period for the Georgia full-scope AA in our assessment of CD services.

In the Atlanta-Sandy Springs-Marietta MSA, WFB provides a limited level of CD services. WFB employees provided a total of 672 hours of CD services. These hours represented 169 CD service activities that benefited 75 different organizations, but amounted to slightly more than one hour of CD service per branch per year. Twenty-two percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Atlanta-Sandy Springs-Marietta MSA include the following:

- WFB employees provided financial education workshops for clients of a principle-centered organization with a mission to provide leadership, advocacy and service to the homeless, helpless and hopeless in the community.
- A WFB employee serves on the board of directors of an organization that has a mission to promote, create and preserve mixed income communities through direct development, lending, policy research and advocacy that result in the equitable distribution of affordable housing throughout the metropolitan Atlanta region.

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

Performance under the Service Test in Chattanooga, Rome, Savannah, and Warner Robins MSAs and Washington County Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Georgia. Performance under the Service Test in Athens-Clarke County, Brunswick, Dalton, Gainesville, Hinesville-Fort Stewart, and Macon MSAs and Gordon County, Jackson County, Lumpkin County, Southern Georgia, Bulloch County, Greene County, Laurens County, and Sumter

County Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Georgia. Performance in limited-scope areas did not influence the Service Test performance in Georgia.

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

## State of Nevada Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Nevada AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Nevada AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Nevada AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants within its full-scope Nevada AA.
- WFB's delivery systems are excellent and readily accessible to all portions of its full-scope Nevada AA.
- WFB's record of opening and closing branches was good and has not adversely affected the accessibility of its delivery systems within its full-scope Nevada AA.
- WFB provides a good level of CD services within its full-scope Nevada AA.

## Description of Institution's Operations in the State of Nevada

Of the bank's 54 state and multistate rating areas, Nevada ranks sixteenth and accounts for 1.6 percent of total bank deposits, or \$1.5 billion as of June 30, 2012. WFB has four defined AAs in Nevada, which include 14 out of 17 total counties in the state. Within the state, WFB operates 122 branches. WFB is the second largest banking institution in Nevada with 12.1 percent of the deposit market share. Primary competitors include Charles Schwab Bank and Bank of America, NA with deposit market shares of 56.7 percent and 9.8 percent, respectively. A significant amount of Charles Schwab Bank deposits are from brokerage clients outside the state of Nevada. The outside deposits inflate the bank's significance to the state.

## Scope of Evaluation in the State of Nevada

Of WFB's four AAs in Nevada, the Las Vegas-Paradise MSA was selected for a full-scope review. This AA accounts for 60.8 percent of the bank's state deposits and is the most significant AA in the state.

Performance context issues affecting the availability of CD loans throughout the state of Nevada had a significant impact on our assessment of CD lending performance. Refer to the market profile for the Las Vegas-Paradise MSA 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 Nevada is rated **Outstanding**. Based on a full-scope review, the bank's performance in the Las Vegas-Paradise MSA is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the Nevada full-scope AA is excellent.

WFB's lending activity in the Las Vegas-Paradise MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, small loans to businesses, and small loans to farms is equal to or exceeds its ranking or percentage market share of deposits.

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

Geographic distribution of loans in the Nevada full-scope AA is adequate.

### *Home Mortgage Loans*

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

WFB's distribution of home purchase loans by income level of the geography in the Las Vegas-Paradise MSA is adequate. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income

geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Las Vegas-Paradise MSA Market Profile, we determined that distribution of home purchase refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered excellent in low-income geographies and good in moderate-income geographies. WFB's distribution of home purchase loans by income level of the geography in the Las Vegas-Paradise MSA was revised and is now considered excellent as a result of these performance context factors.

WFB's distribution of home improvement loans by income level of the geography in the Las Vegas-Paradise MSA is good. Its distribution of home improvement loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Las Vegas-Paradise MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and/or moderate-income geographies relative to extremely economic and demographic conditions discussed in the Las Vegas-Paradise MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and/or moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Las Vegas-Paradise MSA was revised and is now considered good as a result of these performance context factors.

### ***Small Loans to Businesses***

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

WFB's geographic distribution of small loans to businesses by income level of the geography in the Las Vegas-Paradise MSA is adequate. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Nevada section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

WFB's geographic distribution of small loans to farms by income level of the geography in the Las Vegas-Paradise MSA is very poor. The bank's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. Additionally, the bank's market share of small loans to farms in low-income geographies is significantly lower than its overall market share of such loans in the AA. The bank's distribution of small loans to farms in moderate-income geographies is significantly lower than the percent of farms in moderate-income geographies. Additionally, the bank's market share of small loans to farms in moderate-income geographies is significantly lower than its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in the Nevada full-scope AA is good.

### ***Home Mortgage Loans***

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

WFB's borrower distribution of home purchase loans by income level of the borrower in the Las Vegas-Paradise MSA is excellent. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Las Vegas-Paradise MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers approximates the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Las Vegas-Paradise MSA is good. Its distribution of home refinance loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is reasonably near the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Las Vegas-Paradise MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Nevada section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

WFB's distribution of small loans to farms based on the revenue size of the farm in the Las Vegas-Paradise MSA is good. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is reasonably near the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## CD Lending

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

The volume and nature of the bank's CD lending had a significantly positive effect on lending performance in the Nevada full-scope AA.

The volume and nature of WFB's CD lending had a positive effect on Lending Test performance in the Las Vegas-Paradise MSA. During the evaluation period, the bank originated 18 CD loans totaling \$90.4 million and equal to 9.7 percent of allocated Tier 1 Capital.

Fifty-six percent of these loans were targeted to affordable housing, 22 percent to community services, and 22 percent to economic development needs identified in the Las Vegas-Paradise MSA. None of these loans were considered particularly complex or responsive to the needs of the AA. However, when we considered the performance context factors limiting opportunities for CD lending, we determined the level of CD lending was sufficient to have a significantly positive effect on lending performance overall.

Highlights of WFB's CD lending that benefited the Las Vegas-Paradise MSA include the following:

- In September 2009, WFB provided a \$1.5 million term loan for the financing of commercial real estate for an orthopedic practice in Las Vegas, Nevada. This term loan will allow the business to expand to a new building. The loan was made in conjunction with the SBA's 504 Certified Development Company (CDC) program, which is a long-term financing tool for economic development within a community. The partnering CDC promotes economic development through job creation and business expansion by providing funding for small and medium sized businesses in California and Nevada.

- In July 2011, WFB refinanced an \$18.4 million term loan to an entity for the purpose of paying off an existing bridge loan for a 320-unit housing development located in a moderate-income census tract in Las Vegas, Nevada. The asking lease rates for the units, consisting of 64 one-bedroom units, 176 two-bedroom units and 80 three-bedroom units, are affordable to low- and moderate-income tenants.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Carson City MSA is not inconsistent with the bank's overall **Outstanding** performance under the Lending Test in Nevada. In the Reno-Sparks MSA and the Greater Nevada Non-Metropolitan AA, performance is weaker than the bank's overall **Outstanding** Lending Test performance in the state. Performance in the limited-scope AAs did not influence the Lending Test rating in Nevada.

Refer to the Tables 1 through 13 in the Nevada section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Nevada is rated **Outstanding**. Based on a full-scope review, the bank's performance in the Las Vegas-Paradise MSA is excellent.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made one grant totaling \$1.5 million that benefited the entire state during the evaluation period. The current period statewide investments represent less than one percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating was minimal.

## Conclusions for Areas Receiving Full-Scope Reviews

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

WFB's Investment Test performance in the Las Vegas-Paradise MSA is excellent. During the evaluation period, the bank made 201 grants and qualified investments totaling \$50 million that are equal to 5.4 percent of allocated Tier 1 Capital. The total included 157 grants and contributions worth \$9.2 million. WFB has 12 ongoing qualified investments originated in prior periods that total \$18.7 million, are equal to two percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing, economic development, community services, and neighborhood revitalization and stabilization. Investments during the current evaluation period have created over 601 units of affordable housing in the Las Vegas-Paradise MSA.

Examples of significant investments made in the Las Vegas-Paradise MSA during the evaluation period include the following:

- In May 2011, WFB invested \$12 million in an affordable housing development located in Las Vegas, Nevada. Winterwood Senior Apartments is a 142-unit LIHTC project with all but 18 units restricted to low- and moderate-income residents.
- In May 2012, WFB provided a grant of \$7.2 million to NeighborWorks/NeighborhoodLIFT Down Payment Assistance Program. NeighborWorks® America creates opportunities for people to live in affordable homes, improve their lives and strengthen their communities.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Reno-Sparks and Carson City MSAs and the Greater Nevada Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance under the Investment Test for Nevada. Performance in the limited-scope AAs did not influence the Investment Test rating in Nevada.

Refer to Table 14 in the Nevada 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 state of Nevada is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Las Vegas-Paradise MSA is excellent.

### Retail Banking Services

Refer to Table 15 in the 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.

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Nevada full-scope AA is excellent.

In the Las Vegas-Paradise MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Nevada full-scope AA has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Las Vegas-Paradise MSA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed seven branches throughout the AA resulting in a net loss of one branch in a low-income geography, two branches in middle-income geographies, and three branches in upper-income geographies. Although one branch was closed in a low-income geography, the distribution of branches remained excellent after the closure.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Nevada full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Las Vegas-Paradise MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 86 percent of branches located in those geographies maintained Saturday hours, compared to 98 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided a good level of CD services in the Nevada full-scope AA.

In the Las Vegas-Paradise MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 1,335 hours of CD services. These hours represented 391 CD service activities that benefited 57 different organizations and amounted to almost four hours of CD service per branch per store. Sixteen percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Las Vegas-Paradise MSA include the following:

- A WFB employee serves on the board of directors of an organization with a mission to promote affordable housing, homeownership, and neighborhood revitalization in targeted areas throughout Southern Nevada. WFB provided a significant grant to this organization through its NeighborhoodLIFT program.
- A WFB employee provided financial education to a non-profit corporation with the mission to improve the lives of low-income individuals by providing affordable housing solutions and supportive services.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Reno-Sparks and Carson City MSA and Greater Nevada Non-Metropolitan is stronger than the bank's overall **High Satisfactory** performance in Nevada. Performance in limited-scope areas did not influence the Service Test performance in Nevada.

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

## State of New Jersey Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope New Jersey AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope New Jersey AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope New Jersey AA.
- WFB's CD lending has a positive effect on Lending Test performance;
- WFB has an excellent level of qualified CD investment and grants within its full-scope New Jersey AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope New Jersey AA.

### Description of Institution's Operations in the State of New Jersey

Of the bank's 54 state and multistate rating areas, New Jersey ranks fifteenth and accounts for 1.8 percent of total bank deposits, or \$1.7 billion as of June 30, 2012. WFB has five defined AAs in New Jersey, which include all remaining five counties that are not included in the WFB multistate rating areas that include the remaining counties in New Jersey. Within the state, WFB operates 158 branches. WFB is the second largest banking institution in New Jersey with 11.8 percent of the deposit market share. Primary competitors include Bank of America, NA and TD Bank, NA with deposit market shares of 15.1 percent and 11.2 percent, respectively.

### Scope of Evaluation in the State of New Jersey

Of WFB's five AAs in New Jersey, Edison-New Brunswick MD was selected for a full-scope review. This AA accounts for 63.5 percent of the bank's state deposits and is the most significant AA in the state. Because WFB's branches in New Jersey have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA

performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

Refer to the market profile for the Edison-New Brunswick MD 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 New Jersey is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Edison-New Brunswick MD is good.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the New Jersey full-scope AA is excellent.

WFB's lending activity in the Edison-New Brunswick MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to farms is equal to or exceeds its ranking or percentage market share of deposits. The level of lending activity as measured by WFB's ranking or percentage market share for small loans to businesses is somewhat lower than its ranking or percentage market share of deposits.

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

Geographic distribution of loans in the New Jersey full-scope AA is adequate.

### *Home Mortgage Loans*

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

WFB's distribution of home purchase loans by income level of the geography in the Edison-New Brunswick MD is good. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-

income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is reasonably near the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Edison-New Brunswick MD is poor. Its distribution of home improvement loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Edison-New Brunswick MD was adequate. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and/or moderate-income geographies relative to moderately severe economic and demographic conditions discussed in the Edison-New Brunswick MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Edison-New Brunswick MD was revised and is now considered good as a result of these performance context factors.

### ***Small Loans to Businesses***

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

WFB's geographic distribution of small loans to businesses by income level of the geography in the Edison-New Brunswick MD is adequate. The bank's distribution of small loans to businesses in low-income geographies is lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small

loans to businesses in low-income geographies is lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the New Jersey section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the Edison-New Brunswick MD because the number of loans originated in the AA was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AA.

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

Distribution of loans by income level of the borrower in the New Jersey full-scope AA is good. We revised our conclusion to reflect performance context factors identified in the Edison-New Brunswick MD. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

WFB's borrower distribution of home purchase loans by income level of the borrower in the Edison-New Brunswick MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Edison-New Brunswick MD is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-

income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Edison-New Brunswick MD is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Edison-New Brunswick MD is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the New Jersey section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

We did not assess borrower distribution of small loans to farms in the Edison-New Brunswick MD because the number of loans originated in the AA was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AA.

## **CD Lending**

Refer to Table 1 in the New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of CD lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multifamily loans, including those that also qualify as CD loans.

Table 5 does not separately list CD loans. We considered the shorter evaluation period for New Jersey AAs in our assessment of CD loans. Performance context issues affecting the availability of CD loans throughout the state of New Jersey had a significant impact on our assessment of CD lending performance. Please refer to the New Jersey full-scope AA Market Profiles for more information.

The volume and nature of the bank's CD lending had a positive effect on performance in the New Jersey full-scope AA.

The volume and nature of WFB's CD lending had a positive effect on Lending Test performance in the Edison-New Brunswick MD. During the evaluation period, the bank originated seven CD loans totaling \$34 million and equal to 3.16 percent of allocated Tier 1 Capital.

Seventy-one percent of these loans were targeted to affordable housing and 29 percent to community needs identified in the Edison-New Brunswick MD. Seventy-seven percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA. Performance context issues affecting the availability of CD loans throughout the state of New Jersey had a significant impact on our assessment of CD lending performance in the MD.

Highlights of WFB's CD lending that benefited the Edison-New Brunswick MD include the following:

- In September 2011, WFB provided a \$150,000 line of credit for the purpose of providing working capital to a nonprofit organization located in a moderate-income census tract in Asbury Park, New Jersey. This nonprofit organization serves low- and moderate-income residents of Monmouth County, New Jersey. Their focus is to provide services to low- and moderate-income residents that can address the problems and causes of poverty.
- In December 2011, WFB provided a \$10 million line of credit for the purpose of funding the construction of a 91-unit affordable townhome complex located in a moderate-income census tract in Perth Amboy, New Jersey. The units, consisting of 90 two-bedroom units and one three-bedroom unit, will have asking rental rates that are affordable to low- and moderate-income occupants.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Camden MD and the Trenton-Ewing MSA is not inconsistent with the bank's overall **High Satisfactory** performance under the Lending Test in New Jersey. In the, Atlantic City-Hammonton, and Ocean City MSA performance is weaker than the bank's overall

**High Satisfactory** Lending Test performance in the state. Performance in the limited-scope AAs did not influence the Lending Test rating in New Jersey.

Refer to the Tables 1 through 13 in the New Jersey section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in New Jersey is rated **Outstanding**. Based on a full-scope review, the bank's performance in the Edison-New Brunswick MD is excellent.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two grants and investments totaling \$1 million that benefited the entire state during the evaluation period. WFB has two ongoing qualified investments originated in prior periods that total \$16.3 million and provide continuing benefit to the entire state. The combined current and prior period statewide investments represent slightly less than one percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating was minimal.

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the New Jersey section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. We considered the shorter evaluation period for New Jersey AAs in our assessment of qualified investments.

WFB's Investment Test performance in the Edison-New Brunswick MD is excellent. During the evaluation period, the bank made 72 grants and qualified investments totaling \$101.9 million that are equal to 9.3 percent of allocated Tier 1 Capital. The total included 26 grants and contributions worth \$681,000. WFB has no ongoing qualified investments originated in prior periods.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing and neighborhood revitalization and stabilization. Investments during the current evaluation period have created over 210 units of affordable housing in the Edison-New Brunswick MD.

Examples of significant investments made in the Edison-New Brunswick MD during the evaluation period include the following:

- In December 2010, WFB invested \$23 million in a NMTC project to develop a 632,000 square foot 22-story, mixed-use project in downtown New Brunswick, New

Jersey. This neighborhood changing project adjacent to Rutgers University will include a 657 space parking garage, 150 units of rental housing, 57,000 square feet of office space and 58,000 square feet of retail space. The project sponsor is a real estate developer with a focus on low-income tax credit affordable housing. Other participants include the City of New Brunswick and Rutgers University, who have worked in close collaboration to design this project, the Gateway Transit Village, incorporating a mix of uses to satisfy numerous planning and policy goals.

- In September 2011, WFB invested \$30.5 million in a NMTC project in New Brunswick, New Jersey. The funds will be used to construct the New Brunswick Wellness Center, a mixed-use project to include a supermarket, fitness and wellness center, plus a parking garage. This development will provide downtown New Brunswick with its only full-service supermarket and fitness facility. The project sponsor is a group of for-profit related entities engaged in development and management of housing for sale and rental, primarily in the affordable housing arena.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Camden MD is not inconsistent with the bank's overall **Outstanding** performance under the Investment Test in New Jersey. The bank's performance in the Trenton-Ewing, Atlantic City-Hammonton, and Ocean City MSAs is weaker than the bank's overall **Outstanding** performance under the Investment Test for New Jersey. Performance in the limited-scope AAs did not influence the Investment Test rating in New Jersey.

Refer to Table 14 in the 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 the state of New Jersey is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Edison-New Brunswick MD is good.

## **Retail Banking Services**

Refer to Table 15 in the 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.

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the New Jersey full-scope AA is excellent.

In the Edison-New Brunswick MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's full-scope AA.

The percentage distribution of branches in low-income geographies is near to the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering 18 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies accessibility improves in low- and moderate-income geographies and is excellent in moderate-income geographies.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the New Jersey full-scope AA has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals in a negative or positive way.

WFB's record of opening and closing branches in the Edison-New Brunswick MD did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB opened three and closed five branches throughout the AA resulting in a net loss of two branches in middle-income geographies during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the New Jersey full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours do not vary in a way that inconveniences portions of the Edison-New Brunswick MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 80 percent of branches located in those geographies maintained Saturday hours, compared to 99 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided a poor level of CD services in the New Jersey full-scope AA.

In the Edison-New Brunswick MD, WFB provides a poor level of CD services. WFB employees provided a total of 375 hours of CD services. These hours represented 130 CD service activities that benefited 45 different organizations, but amounted to less than one and a half hours of CD services per branch per year. Twenty-three percent of the CD service activities were considered highly responsive to identified community needs. Highlights of WFB's CD services that benefited the Edison-New Brunswick MD include the following:

- WFB employees provided financial education to 100 small business owners in Perth Amboy in a partnership with a nonprofit organization working on a revitalization plan for the Budapest neighborhood that includes helping struggling small business owners.
- WFB employees provided financial education for students at an urban leadership charter school serving predominately low- and moderate-income students.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Camden MD and Atlantic City-Hammonton and Trenton-Ewing MSA is not inconsistent with the bank's overall **High Satisfactory** performance in New Jersey. Performance under the Service Test in the and Ocean City, NJ MSA is weaker than the bank's overall **High Satisfactory** performance in New Jersey. Performance in limited-scope areas did not influence the Service Test performance in New Jersey.

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

## State of North Carolina Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope North Carolina AAs.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope North Carolina AAs.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope North Carolina AAs.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has a significant level of qualified CD investments and grants within its full-scope North Carolina AAs.
- WFB's investments and grants exhibit good responsiveness to credit and community economic development needs within its full-scope North Carolina AAs.
- WFB's delivery systems are excellent and readily accessible to all portions of its full-scope North Carolina AAs.
- To the extent changes have been made, WFB's opening and closing of branches was adequate and has generally not adversely affected the accessibility of its delivery systems within its full-scope North Carolina AAs.

## Description of Institution's Operations in the State of North Carolina

Of the bank's 54 state and multistate rating areas, North Carolina ranks twelfth and accounts for 2.6 percent of total bank deposits, or \$21.8 billion as of June 30, 2012. WFB has 21 defined AAs in North Carolina, which include 69 of the 100 counties in the state. An additional five counties are part of WFB's Charlotte-Gastonia-Rock Hill Multistate MSA AA. Performance for the Multistate is evaluated and discussed in the section specific to the Multistate. Within the state, WFB operates 244 branches. WFB is the second largest banking institution in North Carolina with 15.3 percent of the deposit market share. Primary competitors include Branch Banking and Trust Company (BB&T) and First Citizens Bank and Trust Company with deposit market shares of 33.4 percent and 8.1 percent, respectively.

Because WFB's branches in the North Carolina have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance

evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of North Carolina

Of WFB's 21 AAs in North Carolina, Greensboro-High Point, Raleigh-Cary, and Winston-Salem MSAs and the Northwestern North Carolina Non-Metropolitan AA were selected for full-scope reviews. These AAs accounts for 57 percent of the bank's state deposits and are the most significant AAs in the state.

Refer to the market profiles for the Greensboro-High Point, Raleigh-Cary, and Winston-Salem MSAs and Northwestern North Carolina Non-Metropolitan AAs 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 North Carolina is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Greensboro-High Point and Raleigh-Cary MSAs and the Northwestern North Carolina Non-Metropolitan AA is good and in the Winston-Salem MSA is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in North Carolina full-scope AAs is good.

Greensboro-High Point MSA: WFB's lending activity in the Greensboro-High Point MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, refinance, and small loans to farms is equal to or exceeds its ranking or percentage market share of deposits. The level of lending activity as measured by WFB's ranking or percentage market share for home improvement loans and small loans to businesses is reasonably near its ranking or percentage market share of deposits.

Northwestern North Carolina Non-Metropolitan AA: WFB's lending activity in the Northwestern North Carolina Non-Metropolitan AA reflects excellent responsiveness to

the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance is equal to or exceeds its ranking or percentage market share of deposits. The level of lending activity as measured by WFB's ranking or percentage market share for small loans to businesses and farms is reasonably near its ranking or percentage market share of deposits.

Raleigh-Cary MSA: WFB's lending activity in the Raleigh-Cary MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans is equal to or exceeds its ranking or percentage market share of deposits. The level of lending activity as measured by WFB's ranking or percentage market share for small loans to businesses, is reasonably near, and for small loans to farms is somewhat lower than its ranking or percentage market share of deposits.

Winston-Salem MSA: WFB's lending activity in the Winston-Salem MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

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

Geographic distribution of loans in North Carolina full-scope AAs is adequate.

### ***Home Mortgage Loans***

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

Greensboro-High Point MSA: WFB's distribution of home purchase loans by income level of the geography in the Greensboro-High Point MSA is adequate. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Greensboro-High Point MSA is adequate. Its distribution of home improvement loans in low-income geographies is reasonably near the percent of owner-occupied housing

units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is significantly lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Greensboro-High Point MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is somewhat lower than its overall market share. However, when we assessed performance in low- and moderate-income geographies relative to moderately severe economic and demographic conditions discussed in the Greensboro-High Point MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Greensboro-High Point MSA was revised and is now considered adequate as a result of these performance context factors.

Northwestern North Carolina Non-Metropolitan AA: WFB's distribution of home purchase loans by income level of the geography in the Northwestern North Carolina Non-Metropolitan AA is good. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Northwestern North Carolina Non-Metropolitan AA is adequate. Its distribution of home improvement loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied housing

units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Northwestern North Carolina Non-Metropolitan AA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

Raleigh-Cary MSA: WFB's distribution of home purchase loans by income level of the geography in the Raleigh-Cary MSA is good. Its distribution of home purchase loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Raleigh-Cary MSA is good. Its distribution of home improvement loans in low-income geographies exceeds the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Raleigh-Cary MSA is poor. Its distribution of home refinance loans in low-income geographies is lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Raleigh-Cary

MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Raleigh-Cary MSA was revised and is now considered adequate as a result of these performance context factors.

Winston-Salem MSA: WFB's distribution of home purchase loans by income level of the geography in the Winston-Salem MSA is good. Its distribution of home purchase loans in low-income geographies is reasonably near the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Winston-Salem MSA is poor. Its distribution of home improvement loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Winston-Salem MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to moderately severe economic and demographic conditions discussed in the Winston-Salem MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Winston-Salem MSA was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

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

Greensboro-High Point MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Greensboro-High Point MSA is poor. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near to its overall market share of such loans in the AA.

Northwestern North Carolina Non-Metropolitan AA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Northwestern North Carolina Non-Metropolitan AA is good. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies exceeds the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

Raleigh-Cary MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Raleigh-Cary MSA is adequate. The bank's distribution of small loans to businesses in low-income geographies is lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is lower than its overall market share of such loans in the AA.

Winston-Salem MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Winston-Salem MSA is adequate. The bank's distribution of small loans to businesses in low-income geographies is lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is lower than its overall

market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is somewhat lower than its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the North Carolina section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the Greensboro-High Point MSA, the Northwestern North Carolina Non-Metropolitan AA, the Raleigh-Cary MSA and the Winston-Salem MSA because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

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

Distribution of loans by income level of the borrower in North Carolina full-scope AAs is good.

### ***Home Mortgage Loans***

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

Greensboro-High Point MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Greensboro-High Point MSA is excellent. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Greensboro-High Point MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of

moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Greensboro-High Point MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

Northwestern North Carolina Non-Metropolitan AA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Northwestern North Carolina Non-Metropolitan AA is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Northwestern North Carolina Non-Metropolitan AA is excellent. Its distribution of home improvement loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Northwestern North Carolina Non-Metropolitan AA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is somewhat lower than its overall market share.

Raleigh-Cary MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Raleigh-Cary MSA is good. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA.

WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Raleigh-Cary MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers approximates the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is somewhat lower than its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Raleigh-Cary MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is reasonably near the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers exceeds its overall market share.

However, when we assessed performance to low-income borrowers relative to economic and demographic conditions discussed in the Raleigh-Cary MSA Market Profile, we determined that distribution of home refinance loans to low-income borrowers should be considered adequate. WFB's borrower distribution of home refinance loans by income level of the borrower in the Raleigh-Cary MSA was revised and is now considered good as a result of these performance context factors.

Winston-Salem MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Winston-Salem MSA is good. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Winston-Salem MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income

borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Winston-Salem MSA is adequate. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

Greensboro-High Point MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Greensboro-High Point MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Northwestern North Carolina Non-Metropolitan AA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Northwestern North Carolina Non-Metropolitan AA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Raleigh-Cary MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Raleigh-Cary MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Winston-Salem MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Winston-Salem MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably

near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the North Carolina section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

We did not assess borrower distribution of small loans to farms in the Greensboro-High Point MSA, the Northwestern North Carolina Non-Metropolitan AA, the Raleigh-Cary MSA and the Winston-Salem MSA because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

### **CD Lending**

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

The volume and nature of the bank's CD lending had a positive effect on performance in North Carolina full-scope AAs. We considered the shorter evaluation period for the AAs in the state of North Carolina when assessing the effect of CD lending on performance.

Greensboro-High Point MSA: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Greensboro-High Point MSA. During the evaluation period, the bank originated three CD loans totaling \$6.3 million and equal to 2.85 percent of allocated Tier 1 Capital.

Of the three loans made in the AA, two addressed the need for affordable housing and one addressed the need for economic development.

Highlights of WFB's CD lending that benefited the Greensboro-High Point MSA include the following:

- In December 2012, WFB provided a \$2.1 million loan for the purpose of funding the acquisition and renovation of a 76-unit LIHTC affordable housing complex located in a moderate-income census tract in High Point, North Carolina. The units are restricted to low- and moderate-income residents.

- In April 2010, WFB renewed a \$225,000 line of credit for a loan pool program in Greensboro, North Carolina. This program was created to provide capital financing for small businesses that would typically be ineligible for a traditional loan. The loan pool targets the City of Greensboro State Development Zone that includes East and South Central Greensboro. The primary objective of this loan pool is to create and retain permanent jobs in the Development Zone. In order to qualify for assistance from the loan pool, a permanent job must be created or retained for low- and moderate-income persons for each \$50,000 borrowed.

Northwestern North Carolina Non-Metropolitan AA: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Northwestern North Carolina Non-Metropolitan AA. During the evaluation period, the bank originated no CD loans.

Raleigh-Cary MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Raleigh-Cary MSA. During the evaluation period, the bank originated seven CD loans totaling \$70 million and equal to 10.3 percent of allocated Tier 1 Capital.

Seventy-one percent of these loans addressed the need for affordable housing. Twenty-nine percent addressed the need for community services. Forty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive, positive, somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Raleigh-Cary MSA include the following:

- In April 2012, WFB renewed a \$400,000 working capital line of credit for a nonprofit organization located in a low-income census tract in Raleigh, North Carolina. This nonprofit youth development organization was formed in 1966, where boys up to the age of 18 years may enjoy facilities and programs designed to further their physical, intellectual and spiritual development.
- In June 2011, WFB provided a \$3.5 million loan for the purpose of constructing a 64-unit LIHTC senior affordable housing complex in Holly Springs, North Carolina. This limited liability company is partnering with a nonprofit affordable housing developer that specializes in securing tax credits to construct multi-family affordable housing and affordable housing for seniors. This particular project is a 64-unit LIHTC affordable senior housing development restricted to low- and moderate-income residents.

Winston-Salem MSA: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Winston-Salem MSA. During the evaluation period, the bank originated no CD loans.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Burlington, Durham-Chapel Hill, Fayetteville, Goldsboro, Hickory-Lenoir-Morganton, Jacksonville, Rocky Mount, and Wilmington MSAs is not inconsistent with the bank's overall **High Satisfactory** performance under the Lending Test in North Carolina. In the Asheville MSA, performance is stronger than the bank's overall **High Satisfactory** Lending Test performance in the state. In the Greenville MSA and Camden-Pasquotank, Dare County, Eastern North Carolina, Lee-Moore, Southern North Carolina, Western North Carolina, and Wilson County Non-Metropolitan AAs, performance is weaker than the bank's overall **High Satisfactory** Lending Test performance in the state. Performance in the limited-scope AAs did not influence the Lending Test rating in North Carolina.

Refer to the Tables 1 through 13 in the North Carolina section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in North Carolina is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Greensboro-High Point MSA is excellent, in the Winston-Salem MSA and Northwestern North Carolina Non-Metropolitan AA is good, and in the Raleigh-Cary MSA is adequate. We considered the shorter evaluation period for North Carolina in our assessment of CD investments.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two investments totaling \$3.2 million that benefited the entire state during the evaluation period. WFB has one ongoing qualified investment originating in prior periods for \$129,000 that provides continuing benefit to the entire state. The current and prior period statewide investments are equal to 0.1 percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating was minimal.

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the North Carolina section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. We considered the shorter evaluation period for the AA in the state of North Carolina when assessing performance under the Investment Test.

Greensboro-High Point MSA: WFB's Investment Test performance in the Greensboro-High Point MSA is excellent. During the evaluation period, the bank made 27 grants and qualified investments totaling \$21.3 million that are equal to 9.6 percent of allocated Tier 1 Capital. The total included 24 grants and contributions worth \$799,000. WFB has two ongoing qualified investments originated in prior periods that total \$207,000, are equal to 0.09 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's grants and investments exhibit good responsiveness to credit and CD needs in the AA. The investments in this AA address the identified need for affordable housing and revitalization and stabilization. WFB did not provide information on the number of affordable housing units created by the investments in the Greensboro-High Point MSA.

Examples of significant investments made in the Greensboro-High Point MSA during the evaluation period include the following:

- In December 2011, WFB invested \$11.5 million in a NMTC project located in a moderate-income census tract of Greensboro, North Carolina. The investment was used to provide financing for the rehabilitation of a 64,599 square foot former steel mill office in a blighted area south of downtown Greensboro, with office space for 75 small business owners. The project created an estimated 95 permanent jobs. WFB is the sole capital provider, providing leverage debt and tax credit equity. The project developer is a private non-profit corporation whose mission is to enhance economic development in Greensboro, North Carolina and the surrounding area.

Northwestern North Carolina Non-Metropolitan AA: WFB's Investment Test performance in the Northwestern North Carolina Non-Metropolitan AA is good. During the evaluation period, the bank made 31 grants and qualified investments totaling \$9.5 million that are equal to 3.9 percent of allocated Tier 1 Capital. The total included 16 grants and contributions worth \$93,000. WFB has one ongoing qualified investment originated in prior periods for \$314,000 and is equal to 0.1 percent of allocated Tier 1 Capital, and provided continuing benefit to the community.

WFB's investments exhibit adequate responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing and revitalization and stabilization predominately through investments in mortgage backed securities and low-income housing tax credit investment funds. Investments during the current evaluation period have created over 21 units of affordable housing in the Northwestern North Carolina Non-Metropolitan AA.

- In May 2011, WFB invested \$2.5 million in a NMTC project in Wilkesboro, North Carolina. The funds were used for the development, rehabilitation, lease, ownership

and management of a shopping center that is located in a non-metropolitan census tract that qualifies as a severely distressed community.

Raleigh-Cary MSA: WFB's Investment Test performance in the Raleigh-Cary MSA is good. During the evaluation period, the bank made 73 grants and qualified investments totaling \$20.6 million that are equal to 3.0 percent of allocated Tier 1 Capital. The total included 59 grants and contributions worth \$1.5 million. WFB has three ongoing qualified investments originated in prior periods that total \$2.06 million, are equal to 0.3 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB exhibits excellent responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing and revitalization and stabilization. Investments during the current evaluation period have created over 10 units of affordable housing in the Raleigh-Cary MSA.

Examples of significant investments made in the Raleigh-Cary MSA during the evaluation period include the following:

- In June 2012, WFB invested \$350,000 through an EQ2 in a nonprofit organization dedicated to strengthening neighborhoods and families by offering expanded homeownership opportunities; providing quality affordable rental housing for families, seniors and other individuals with limited incomes; and enhancing the economic well-being of low-wealth neighborhoods. The proceeds of the investment were used to acquire raw land for development of low- and moderate-income housing; acquire and rehab existing rental properties; and cover pre-development costs for low- and moderate-income housing developments.
- In October 2010, WFB invested \$15 million in NMTC financing for the construction of a warehouse to be leased and occupied by a global medical technology company, in Four Oaks, North Carolina. In addition, funds will be used for the acquisition of an existing building that will be used to operate a healthcare clinic, providing services to the low-income population in Four Oaks.

Winston-Salem MSA: WFB's Investment Test performance in the Winston-Salem MSA is adequate. During the evaluation period, the bank made 59 grants and qualified investments totaling \$4.7 million that are equal to 1.9 percent of allocated Tier 1 Capital. The total included 39 grants and contributions worth \$2 million. WFB has two ongoing qualified investments originated in prior periods that total \$1.09 million, are equal to 0.4 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB exhibits adequate responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing through the purchase of mortgage-backed securities during the latter

part of the evaluation period. Investments during the current evaluation period have created over 20 units of affordable housing in the Winston-Salem MSA.

Examples of significant investments made in the Winston-Salem MSA during the evaluation period include the following:

- In 2011, WFB provided a \$140,000 Priority Markets Grant for a Neighborhood Revitalization Initiative to continue revitalization work in the historic Cherry Street/Kimberley Park neighborhood near downtown Winston-Salem. The neighborhood is the single-family home phase of a successful Hope VI project, which has transformed a former public-housing community into a mixed-income, single- and multi-family community.
- WFB provided a \$250,000 grant to the Student Success Center at Winston-Salem State University to re-purpose a vacant campus building into a Student Success Center. The center will provide support for students who come from under-resourced schools and who are often the first in their families to attend college.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Durham-Chapel Hill, Hickory-Lenoir-Morganton, and Wilmington MSAs is not inconsistent with the bank's overall **High Satisfactory** performance under the Investment Test in North Carolina. The bank's performance under the Investment Test in the Fayetteville and Goldsboro MSA is stronger than the bank's overall **High Satisfactory** performance under the Investment Test in North Carolina. The bank's performance in the Asheville, Burlington, Greenville, Jacksonville, and Rocky Mount MSA and Eastern North Carolina, Southern North Carolina, Camden-Pasquotank, Lee-Moore, Wilson County, Dare County, Western North Carolina Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance under the Investment Test for North Carolina. Performance in the limited-scope AAs did not influence the Investment Test rating in North Carolina.

Refer to Table 14 in the North Carolina 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 state of North Carolina is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the

Greensboro-High Point and Winston-Salem MSAs is excellent and Raleigh-Cary MSA and Northwestern North Carolina Non-Metropolitan AA is good.

## **Retail Banking Services**

Refer to Table 15 in the North Carolina 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.

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in North Carolina full-scope AAs is excellent.

In the Greensboro-High Point MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is excellent. WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Northwestern North Carolina Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

There were no branches in low-income census tracts. However, because 1.6 percent of the AA population resides in low-income geographies, more weight was placed on moderate-income tracts when assessing performance. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Raleigh-Cary MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low-income geographies is reasonably near the percentage of the population residing in these geographies and is good. The percentage distribution of branches in moderate-income geographies is below the percentage of the population residing in these geographies and is adequate. However, when considering six middle- and upper-income branch locations that are in close

proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies and is excellent in low-income geographies and good in moderate-income geographies. Overall distribution improved and is considered excellent due to bordering branches.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Winston-Salem MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in North Carolina full-scope AAs is adequate and has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. WFB did not open or close any branches in the Greensboro-High Point and Winston-Salem MSAs during the evaluation period.

WFB's record of opening and closing branches in the Northwestern North Carolina Non-Metropolitan AA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed two branches throughout the AA resulting in a net loss of one branch in a low-income geography. In spite of the loss, distribution in low-income geographies remained excellent.

WFB's record of opening and closing branches in the Raleigh-Cary MSA is adequate. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened and closed one branch throughout the AA resulting in a net loss of one branch in a moderate-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of North Carolina, particularly low- and moderate-income geographies and individuals.

In the Greensboro-High Point MSA, WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Greensboro-High Point MSA, particularly low- and moderate-income geographies and individuals. No branches located in low- and moderate-income geographies maintained Saturday hours, compared to 14 percent of branches located in middle- and upper-income areas. However, only three of 31 total branches within the entire AA operate on Saturdays, regardless of income level.

In the Northwestern North Carolina Non-Metropolitan AA, WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Northwestern North Carolina Non-Metropolitan AA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income areas, 11 percent of branches located in those geographies maintained Saturday hours, compared to 15 percent of branches located in middle- and upper-income areas.

In the Raleigh-Cary MSA, WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Raleigh-Cary MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income areas, 44 percent of branches located in those geographies maintained Saturday hours, compared to 47 percent of branches located in middle- and upper-income areas.

In the Winston-Salem MSA, WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Winston-Salem MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income areas, 13 percent of branches located in those geographies maintained Saturday hours, compared to 25 percent of branches located in middle- and upper-income geographies. It should be noted that only four branches maintain Saturday hours, regardless of income level.

### **CD Services**

WFB provided a good level of CD services in North Carolina full-scope AAs. We considered the shorter evaluation period for North Carolina in our assessment of CD Loans.

In the Greensboro-High Point MSA, WFB provides an adequate level of CD services. WFB employees provided a total of 186 hours of CD services. These hours represented 19 CD service activities that benefited 11 different organizations and amounted to a little more than two hours of CD service per branch per year. Thirty-two

percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Greensboro-High Point MSA include the following:

- A WFB employee provided a new homebuyer presentation to the clients of a nonprofit organization that serves residents in Greensboro and High Point, North Carolina. The organization has been successful in helping families obtain the tools and support needed to become self-sufficient and to maintain self-sufficiency. Its goal is to increase affordable homeownership opportunities in Guilford County.

In the Northwestern North Carolina Non-Metropolitan AA, WFB provides an adequate level of CD services. WFB employees provided a total of 89 hours of CD services. These hours represented ten CD service activities that benefited ten different organizations and amounted to slightly less than one hour of CD service per branch per year. Ten percent of the CD service activities were considered highly responsive to identified community needs. We considered the low level of CD opportunities in our assessment of CD services.

Highlights of WFB's CD services that benefited the Northwestern North Carolina Non-Metropolitan AA include the following:

- A WFB employee serves on the board of directors of a non-profit affordable housing developer and homeownership counseling agency.

In the Raleigh-Cary MSA, WFB provides an excellent level of CD services. WFB is a leader in providing CD services. WFB employees provided a total of 334 hours of CD services. These hours represented 130 CD service activities that benefited 22 different organizations and amounted to almost three hours of CD service per branch per year. In addition, more than 50 percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Raleigh-Cary MSA include the following:

- A WFB employee serves on the board of directors of a not for profit community economic development organization founded to provide financial and counseling assistance to low and moderate income residents of the City of Raleigh, North Carolina. The mission of the organization is to increase the rate of successful low-to-moderate homebuyers through comprehensive education services, information and long-term support.

- A WFB employee serves on the board of directors of a private, non-profit membership organization working for decent, affordable housing that promotes self-determination and stable communities for low- and moderate-income North Carolinians. The organization works to increase investment in quality affordable homes so that working families and individuals, persons with disabilities, people in crisis, and fixed-income seniors may live with opportunity and dignity.

In the Winston-Salem MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 195 hours of CD services. These hours represented 74 CD service activities that benefited 11 different organizations and amounted to more than 3.5 hours of CD service per branch per year. None of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Winston-Salem MSA include the following:

- A WFB employee represented the bank at housing summit presented by a statewide nonprofit organization representing the interest of underdeveloped and underutilized sectors of the state's economic base.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Durham-Chapel Hill MSA and the Dare County Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in North Carolina. Performance under the Service Test in the Asheville, Goldsboro, Hickory-Lenoir-Morganton, and Wilmington MSAs and Camden-Pasquotank and Eastern North Carolina Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in North Carolina. Performance under the Service Test in the Fayetteville, Greenville, Burlington, Jacksonville, and Rocky Mount MSAs and the Southern North Carolina, Lee-Moore, Western North Carolina and Wilson County Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in North Carolina. Performance in limited-scope areas did not influence the Service Test performance in North Carolina.

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

## State of Pennsylvania Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to credit needs of its full-scope Pennsylvania AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Pennsylvania AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Pennsylvania AA.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has a good level of qualified CD investment and grants within WFB's full-scope Pennsylvania AA.
- WFB's delivery systems are good and are accessible to essentially all portions of its full-scope Pennsylvania AA.

## Description of Institution's Operations in the State of Pennsylvania

Of the bank's 54 state and multistate rating areas, Pennsylvania ranks seventh and accounts for 3.5 percent of total bank deposits, or \$3.2 billion as of June 30, 2012. WFB has nine defined AAs in Pennsylvania, which include 23 out of 67 counties in the state. Within the state, WFB operates 240 branches. WFB is the second largest banking institution in Pennsylvania with 10.4 percent of the deposit market share. Primary competitors include PNC Bank, NA and Citizens Bank of Pennsylvania, with deposit market shares of 21 percent and 10.4 percent, respectively

Because WFB's branches in the state of Pennsylvania have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of Pennsylvania

Of WFB's nine AAs in Pennsylvania, the Philadelphia MD was selected for full-scope review. This MD accounts for 79.3 percent of the bank's state deposits and is the most significant AA in the state.

Refer to the market profile for the Philadelphia MD 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 Pennsylvania is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Philadelphia MD is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in the Pennsylvania full-scope AA is good.

WFB's lending activity in the Philadelphia MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, refinance, and small loans to farms is equal to or exceeded its ranking or percentage market share of deposits. The level of lending activity as measured by WFB's ranking or percentage market share for home improvement loans and small loans to businesses is reasonably near its ranking or percentage market share of deposits.

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

Geographic distribution of loans in the Pennsylvania full-scope AA is adequate.

### *Home Mortgage Loans*

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

WFB's distribution of home purchase loans by income level of the geography in the Philadelphia MD is adequate. Its distribution of home purchase loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is reasonably near the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the Philadelphia MD Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low-income geographies should be considered adequate. WFB's distribution of home purchase loans by income level of the geography in the Philadelphia MD was revised and is now considered good as a result of these performance context factors.

WFB's distribution of home improvement loans by income level of the geography in the Philadelphia MD is adequate. Its distribution of home improvement loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Philadelphia MD is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's geographic distribution of small loans to businesses by income level of the geography in the Philadelphia MD is adequate. The bank's distribution of small loans to businesses in low-income geographies is lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Pennsylvania section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Philadelphia MD: WFB's geographic distribution of small loans to farms by income level of the geography in the Philadelphia MD is very poor. The bank's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. Additionally, the bank's market share of small loans to farms in low-income geographies is significantly lower than its overall market share of such loans in the AA. The bank's distribution of small loans to farms in moderate-income geographies is significantly lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to farms in moderate-income geographies is significantly lower than its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in the Pennsylvania full-scope AA is good.

### ***Home Mortgage Loans***

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

WFB's borrower distribution of home purchase loans by income level of the borrower in the Philadelphia MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its

market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Philadelphia MD is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Philadelphia MD is adequate. Its distribution of home refinance loans to low-income is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Philadelphia MD is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Pennsylvania section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

WFB's distribution of small loans to farms based on the revenue size of the farm in the Philadelphia MD is good. WFB's percentage of small loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## CD Lending

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

The volume and nature of the bank's CD lending had a neutral effect on performance in the Pennsylvania full-scope AA. We considered the shorter evaluation period for Pennsylvania in our assessment of CD loans.

The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the Philadelphia MD. During the evaluation period, the bank originated 21 CD loans totaling \$88 million and equal to 3.4 percent of allocated Tier 1 Capital.

Forty-three percent of these loans were targeted to affordable housing, 10 percent to stabilization and revitalization efforts, and 47 percent to community service needs identified in the Philadelphia MD. Nineteen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Philadelphia MD include the following:

- In April 2011, WFB provided a \$3 million line of credit to support working capital related to funding delays from the Department of Public Welfare for a nonprofit organization's subsidized childcare program. The nonprofit organization plays an important role in addressing barriers to entry into the workplace. The line of credit proceeds are going to support this nonprofit organization's Child Care Information Services program, which is a valuable resource for low-income working parents and families in transition from welfare seeking affordable and quality childcare.
- In June 2011, WFB provided a \$250,000 line of credit for the purpose of providing working capital to a nonprofit organization located in Sharon Hill, Pennsylvania. This nonprofit organization provides medical care, dental care, and social services to uninsured and underinsured minority residents of Chester, Delaware County, Pennsylvania. They are the largest and most comprehensive HIV/AIDS service provider for the city and its many small surrounding communities.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, performance under the Lending Test in the Lebanon, Reading, Lancaster, and York-Hanover MSAs and Monroe-Wayne and Northumberland-Schuylkill Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance under the Lending Test in Pennsylvania. The bank's performance under the Lending Test in the Harrisburg-Carlisle MSA is stronger than the bank's overall **High Satisfactory** Lending Test performance in the state of Pennsylvania. The bank's performance under the Lending Test in the Scranton-Wilkes-Barre, MSA is weaker than with the bank's overall **High Satisfactory** performance under the Lending Test in Pennsylvania. Performance in the limited-scope AAs did not influence the Lending Test rating in Pennsylvania.

Refer to the Tables 1 through 13 in the Pennsylvania section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Pennsylvania is rated **High Satisfactory**. Based on a full-scope review, the bank's performance in the Philadelphia MD is good. We considered the shorter evaluation period for Pennsylvania in our assessment of qualified investments.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made four investments totaling \$1.08 million that benefited the entire state during the evaluation period. WFB has one ongoing qualified investment originating in a prior period for \$2.9 million that provides continuing benefit to the entire state. The current and prior period statewide investments are equal to 0.1 percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating was minimal.

## Conclusions for Areas Receiving Full-Scope Reviews

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

WFB's Investment Test performance in the Philadelphia MD is good. During the evaluation period, the bank made 206 grants and qualified investments totaling \$106.9 million that are equal to 4.1 percent of allocated Tier 1 Capital. The total included 173 grants and contributions worth \$12 million. WFB has 10 ongoing qualified investments originated in prior periods that total \$47.6 million, are equal to 1.8 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for

affordable housing, economic development, and revitalization and stabilization. Investments during the current evaluation period have created over 394 units of affordable housing in the Philadelphia MD.

Examples of significant investments made in the Philadelphia MD during the evaluation period include the following:

- In July 2010, WFB invested \$1 million through an EQ2 in a non-profit loan fund created to encourage the growth and stability of the small business sector and to facilitate opportunities for banks to make business loans in the city of Camden, New Jersey and other economically distressed areas in southern New Jersey and Philadelphia. This investment was used as part of a capital campaign to expand existing lending programs of the organization.
- In September 2010, WFB invested \$9.6 million in Paschall Village Phase I Apartments, a 50-unit affordable housing project. This is the initial phase of a two-phase affordable rental housing development project that will be located in the southwest section of Philadelphia, Pennsylvania. This is a direct investment for the construction of a low-income housing tax credit project.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Harrisburg-Carlisle, Scranton-Wilkes-Barre and York-Hanover MSAs was stronger than the bank's overall **High Satisfactory** performance under the Investment Test in Pennsylvania. The bank's performance in the Lancaster, Reading, and Lebanon MSAs and Monroe-Wayne and Northumberland-Schuylkill Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance under the Investment Test for Pennsylvania. Performance in the limited-scope AAs did not influence the Investment Test rating in Pennsylvania. Refer to Table 14 in the Pennsylvania 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 state of Pennsylvania is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Philadelphia MD is good.

## **Retail Banking Services**

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

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Pennsylvania full-scope AA is good.

In the Philadelphia MD, WFB's distribution of branches is good. Delivery systems are accessible to essentially all of WFB's AA.

The percentage distribution of branches in low-income geographies is below the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Pennsylvania full-scope AA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Philadelphia MD did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB opened four and closed four branches throughout the AA resulting in no gain or loss of branches in low-, moderate-, middle-, or upper-income geographies during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Pennsylvania full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Philadelphia MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 56 percent of branches located in those geographies maintained Saturday hours compared to 63 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided an adequate level of CD services in the Pennsylvania full-scope AA. We considered the shorter evaluation period for Pennsylvania in our assessment of CD Services.

In the Philadelphia MD, WFB provides an adequate level of CD services. WFB employees provided a total of 1,018 hours of CD services. These hours represented 219 CD service activities that benefited 103 different organizations and amounted to almost two and a half hours of CD service per branch per year. Seven percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Philadelphia MD include the following:

- A WFB employee provides technical assistance as it relates to Small Business Lending, Small Business workshops, and capacity building for the Philadelphia Business Builder Loan Program. The program was developed as a pilot lending initiative to increase the flow of capital to small businesses located in low- and moderate-income geographies in the City of Philadelphia.
- WFB employees provided Hands on Banking First Time Homebuyer Workshop for 200 low- and moderate-income individuals at the Philadelphia Housing Authority's June Homeownership Event.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Harrisburg-Carlisle, Reading, Scranton-Wilkes-Barre, York-Hanover and Lancaster MSAs and the Northumberland-Schuylkill and Monroe-Wayne Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Pennsylvania. Performance under the Service Test in the Lebanon MSA is weaker than the bank's overall **High Satisfactory** performance in Pennsylvania. Performance in limited-scope areas did not influence the Service Test performance in Pennsylvania.

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

## State of Texas Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Texas AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Texas AAs.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Texas AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants within its full-scope Texas AAs.
- WFB's delivery systems are readily accessible to all portions of WFB's full-scope Texas AAs.
- To the extent changes have been made, WFB's record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies within its full-scope Texas AAs.

## Description of Institution's Operations in the State of Texas

Of the bank's 54 state and multistate rating areas, Texas ranks fifth and accounts for \$6.3 billion or 6.6 percent of total bank deposits as of June 30, 2012. WFB has 35 defined AAs in Texas, which include 98 out of 254 total counties in the state. Within the state, WFB operates 668 branches. WFB is the second largest banking institution in Texas with 14.3 percent of the deposit market share. Primary competitors include JP Morgan Chase Bank and Bank of America, NA with deposit market shares of 17.7 percent and 13.3 percent, respectively.

## Scope of Evaluation in the State of Texas

Of WFB's 35 AAs in Texas, the Dallas-Plano-Irving and Fort Worth-Arlington MDs and the Austin-Round Rock-San Marcos, El Paso, and Houston-Sugar Land-Baytown MSAs were selected for full-scope review. These MSAs and MDs account for 75.4 percent of the bank's state deposits and are the most significant AAs in the state.

Refer to the market profile for the Dallas-Plano-Irving and Fort Worth-Arlington MDs and the Austin-Round Rock-San Marcos, El Paso, and Houston-Sugar Land-Baytown MSAs 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 Texas is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the El Paso and Houston-Sugar Land-Baytown MSAs is good and in the Austin-Round Rock-San Marcos MSA and the Dallas-Plano-Irving and Fort Worth-Arlington MDs is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in Texas full-scope AAs is excellent.

Austin-Round Rock-San Marcos MSA: WFB's lending activity in the Austin-Round Rock-San Marcos MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

Dallas-Plano-Irving MD: WFB's lending activity in the Dallas-Plano-Irving MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

El Paso MSA: WFB's lending activity in the El Paso MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

Fort Worth-Arlington MD: WFB's lending activity in the Fort Worth-Arlington MD reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home

improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

Houston-Sugar Land-Baytown MSA: WFB's lending activity in the Houston-Sugar Land-Baytown MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, refinance, and small loans to businesses and farms is equal to or exceeded its ranking or percentage market share of deposits.

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

Distribution of loans by income level of the geography in Texas full-scope AAs is good. We revised our conclusions to reflect performance context factors identified in the Austin-Round Rock-San Marcos MSA, the Dallas-Plano-Irving MD, the El Paso MSA, the Fort Worth-Arlington MD, and the Houston-Sugar Land-Baytown MSA. For more information, please refer to the discussion of performance for the specific AA.

#### ***Home Mortgage Loans***

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

Austin-Round Rock-San Marcos MSA: WFB's geographic distribution of home purchase loans by income level in the Austin-Round Rock-San Marcos MSA is poor. Its distribution of loans in low-income geographies is somewhat lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's geographic distribution of home improvement loans by income level in the Austin-Round Rock-San Marcos MSA is adequate. Its distribution of loans in low-income geographies is lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is reasonably near its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Austin-Round Rock-San Marcos MSA is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

Dallas-Plano-Irving MD: WFB's geographic distribution of home purchase loans by income level in the Dallas-Plano-Irving MD is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Dallas-Plano-Irving MD Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered good. WFB's geographic distribution of home purchase loans by income level in the Dallas-Plano-Irving MD was revised and is now considered good as a result of these performance context factors.

WFB's geographic distribution of home improvement loans by income level in the Dallas-Plano-Irving MD is adequate. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Dallas-Plano-Irving MD is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Dallas-Plano-Irving MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Dallas-Plano-Irving MD was revised and is now considered good as a result of these performance context factors.

El Paso MSA: WFB's geographic distribution of home purchase loans by income level in the El Paso MSA is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home improvement loans by income level in the El Paso MSA is poor. Its distribution of loans in low-income geographies is somewhat lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's geographic distribution of home refinance loans by income level in the El Paso MSA is very poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is significantly lower than its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to severe economic and demographic conditions discussed in the El Paso MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the El Paso MSA was revised and is now considered poor as a result of these performance context factors.

Fort Worth-Arlington MD: WFB's geographic distribution of home purchase loans by income level in the Fort Worth-Arlington MD is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Fort Worth-Arlington MD Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home purchase loans by income level in the Fort Worth-Arlington MD was revised and is now considered good as a result of these performance context factors.

WFB's geographic distribution of home improvement loans by income level in the Fort Worth-Arlington MD is good. Its distribution of loans in low-income geographies is lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies exceeds the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies exceeds its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Fort Worth-Arlington MD is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Fort Worth-Arlington MD Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Fort Worth-Arlington MD was revised and is now considered good as a result of these performance context factors.

Houston-Sugar Land-Baytown MSA: WFB's geographic distribution of home purchase loans by income level in the Houston-Sugar Land-Baytown MSA is poor. Its distribution of loans in low-income geographies is lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Houston-Sugar Land-Baytown MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home purchase loans by income level in the Houston-Sugar Land-Baytown MSA was revised and is now considered good as a result of these performance context factors.

WFB's geographic distribution of home improvement loans by income level in the Houston-Sugar Land-Baytown MSA is adequate. Its distribution of loans in low-income geographies is reasonably near the percent of owner-occupied units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's geographic distribution of home refinance loans by income level in the Houston-Sugar Land-Baytown MSA is poor. Its distribution of loans in low-income geographies is significantly lower than the percent of owner-occupied units in low-income geographies. WFB's market share of home refinance loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is significantly lower than the percent of owner-occupied units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to economic and demographic conditions discussed in the Houston-Sugar Land-Baytown MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's geographic distribution of home refinance loans by income level in the Houston-Sugar Land-Baytown MSA was revised and is now considered adequate as a result of these performance context factors.

### ***Small Loans to Businesses***

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

Austin-Round Rock-San Marcos MSA: WFB's geographic distribution of small loans to businesses in the Austin-Round Rock-San Marcos MSA is good. The bank's distribution of small loans to businesses in low-income geographies is reasonably near the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Dallas-Plano-Irving MD: WFB's geographic distribution of small loans to businesses in the Dallas-Plano-Irving MD is good. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

El Paso MSA: WFB's geographic distribution of small loans to businesses in the El Paso MSA is excellent. The bank's distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies approximates the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near its overall market share of such loans in the AA.

Fort Worth-Arlington MD: WFB's geographic distribution of small loans to businesses in the Fort Worth-Arlington MD is excellent. The bank's distribution of small loans to businesses in low-income geographies exceeds the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies exceeds its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies

exceeds the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies exceeds its overall market share of such loans in the AA.

Houston-Sugar Land-Baytown MSA: WFB's geographic distribution of small loans to businesses in the Houston-Sugar Land-Baytown MSA is adequate. The bank's distribution of small loans to businesses in low-income geographies is reasonably near the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is somewhat lower than its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is somewhat lower than its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Texas section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Austin-Round Rock-San Marcos MSA: WFB's geographic distribution of small loans to farms in the Austin-Round Rock-San Marcos MSA is excellent. WFB's distribution of small loans to farms in low-income geographies exceeds the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies exceeds the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

Dallas-Plano-Irving MD: WFB's geographic distribution of small loans to farms in the Dallas-Plano-Irving MD is poor. WFB's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is somewhat lower than the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies is lower than its overall market share of such loans in the AA.

El Paso MSA: WFB's geographic distribution of small loans to farms in the El Paso MSA is good. WFB's distribution of small loans to farms in low-income geographies exceeds the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of

such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is lower than the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies exceeds its overall market share of such loans in the AA.

Fort Worth-Arlington MD: WFB's geographic distribution of small loans to farms in the Fort Worth-Arlington MD is good. WFB's distribution of small loans to farms in low-income geographies exceeds the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is reasonably near the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies is somewhat lower than its overall market share of such loans in the AA.

Houston-Sugar Land-Baytown MSA: WFB's geographic distribution of small loans to farms in the Houston-Sugar Land-Baytown MSA is poor. WFB's distribution of small loans to farms in low-income geographies is significantly lower than the percent of farms in low-income geographies. The bank's market share of small loans to farms in low-income geographies exceeds its overall market share of such loans in the AA. WFB's distribution of small loans to farms in moderate-income geographies is lower than the percent of farms in moderate-income geographies. The bank's market share of small loans to farms in moderate-income geographies is lower than its overall market share of such loans in the AA.

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

Distribution of loans by income level of the borrower in Texas full-scope AAs is good. We revised our conclusions to reflect performance context factors identified in the Austin-Round Rock-San Marcos MSA, the Dallas-Plano-Irving MD, the El Paso MSA, the Fort Worth-Arlington MD, and the Houston-Sugar Land-Baytown MSA. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Austin-Round Rock-San Marcos MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Austin-Round Rock-San Marcos MSA is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower

distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Austin-Round Rock-San Marcos MSA is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers approximates the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Austin-Round Rock-San Marcos MSA is adequate. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is equal to its overall market share.

Dallas-Plano-Irving MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Dallas-Plano-Irving MD is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Dallas-Plano-Irving MD is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is reasonably near the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Dallas-Plano-Irving MD is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-

income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to moderately severe economic and demographic conditions discussed in the Dallas-Plano-Irving MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low- and moderate-income borrowers should be considered poor for low-income borrowers and adequate for moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the Dallas-Plano-Irving MD was revised and is now considered adequate as a result of these performance context factors.

El Paso MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the El Paso MSA is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is somewhat lower than its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the El Paso MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of low-income borrowers should be considered poor. WFB's borrower distribution of home purchase loans by income level of the borrower in the El Paso MSA was revised and is now considered adequate as a result of these performance context factors.

WFB's borrower distribution of home improvement loans by income level of the borrower in the El Paso MSA is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the El Paso MSA is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to

moderate-income borrowers is significantly lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to severe economic and demographic conditions discussed in the El Paso MSA Market Profile, we determined that distribution of home refinance loans compared to the percentage of low- and moderate-income borrowers should be considered poor for low-income borrowers and adequate for moderate-income borrowers. WFB's borrower distribution of home refinance loans by income level of the borrower in the El Paso MSA was revised and is now considered adequate as a result of these performance context factors.

Fort Worth-Arlington MD: WFB's borrower distribution of home purchase loans by income level of the borrower in the Fort Worth-Arlington MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Fort Worth-Arlington MD is good. Its distribution of loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Fort Worth-Arlington MD is adequate. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is somewhat lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers exceeds its overall market share.

However, when we assessed performance to low- and moderate-income borrowers relative to moderately severe economic and demographic conditions discussed in the Fort Worth-Arlington MD Market Profile, we determined that distribution of home refinance loans compared to the percent of low-income borrowers should be considered

adequate. WFB's borrower distribution of home refinance loans by income level of the borrower in the Fort Worth-Arlington MD was revised and is now considered good as a result of these performance context factors.

Houston-Sugar Land-Baytown MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Houston-Sugar Land-Baytown MSA is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Houston-Sugar Land-Baytown MSA is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers is reasonably near the percent of moderate-income families within the AA. WFB's market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Houston-Sugar Land-Baytown MSA is poor. Its distribution of loans to low-income borrowers is significantly lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers is lower than the percent of moderate-income families within the AA. WFB's market share of home refinance loans to moderate-income borrowers is reasonably near its overall market share.

### ***Small Loans to Businesses***

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

Austin-Round Rock-San Marcos MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Austin-Round Rock-San Marcos MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Dallas-Plano-Irving MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Dallas-Plano-Irving MD is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

El Paso MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the El Paso MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Fort Worth-Arlington MD: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Fort Worth-Arlington MD is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Houston-Sugar Land-Baytown MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Houston-Sugar Land-Baytown MSA is excellent. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less exceeds the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Texas section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Austin-Round Rock-San Marcos MSA: WFB's distribution of small loans to farms based on the revenue size of the farms in the Austin-Round Rock-San Marcos MSA is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is reasonably near the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Dallas-Plano-Irving MD: WFB's distribution of small loans to farms based on the revenue size of the farms in the Dallas-Plano-Irving MD is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is reasonably near the

percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

El Paso MSA: WFB's distribution of small loans to farms based on the revenue size of the farms in the El Paso MSA is excellent. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less exceeds the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Fort Worth-Arlington MD: WFB's distribution of small loans to farms based on the revenue size of the farms in the Fort Worth-Arlington MD is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is reasonably near the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

Houston-Sugar Land-Baytown MSA: WFB's distribution of small loans to farms based on the revenue size of the farms in the Houston-Sugar Land-Baytown MSA is good. WFB's percentage of loans to farms with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small farms in the AA. WFB's market share of loans to farms with gross annual revenue of \$1 million or less exceeds its overall farm loan market share.

## CD Lending

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

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Texas full-scope AAs.

Austin-Round Rock-San Marcos MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Austin-Round Rock-San Marcos MSA. During the evaluation period, the bank originated 27 CD loans totaling \$137.6 million and equal to 20.1 percent of allocated Tier 1 Capital.

Seventy-eight percent of these loans were targeted to affordable housing, seven percent to stabilization and revitalization efforts, and fifteen percent to community services needs identified in the Austin-Round Rock-San Marcos MSA. Twenty-six percent of WFB's CD loans were considered particularly complex and/or responsive to needs identified in the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Austin-Round Rock-San Marcos MSA include the following:

- In January 2012, WFB renewed a \$150,000 line of credit for an entity for the purpose of providing working capital for the borrower located in Austin, Texas. This nonprofit organization has a mission to prevent and help end homelessness and poverty housing for those working to achieve independent living in Central Texas. This is accomplished by creating affordable, safe, quality housing; providing residents with access to supportive services; and educating about, and advocating for, individuals and families struggling with homelessness and at-risk for homelessness.
- In February 2010, WFB provided a \$6.5 million loan to a borrower to finance the purchase and rehabilitation of a 238-unit apartment building located in a moderate-income census tract in Austin, Texas. The units will be renovated over a period of 18 months and will serve to make the building in compliance with the Americans with Disability Act. All of the units are restricted to 50 percent of the area's median income in adherence with the Rental Housing Development Affordable Loan Program. The borrower is a non-profit organization that empowers low-income families and individuals with the tools they need to succeed.

Dallas-Plano-Irving MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Dallas-Plano-Irving MD. During the evaluation period, the bank originated 28 CD loans totaling \$135.8 million and equal to 11.21 percent of allocated Tier 1 Capital.

Sixty-one percent of these loans were targeted to affordable housing, eleven percent to community services, and twenty-eight percent to economic development needs identified in the Dallas-Plano-Irving MD. Seven percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Dallas-Plano-Irving MD include the following:

- In May 2011, WFB renewed a \$300,000 line of credit for the purpose of providing working capital to a nonprofit organization located in a moderate-income census tract in Dallas, Texas. The borrower is one of the largest non-profit providers of preventative dental care and dental health education to low-income individuals in Texas. Established in 1963, they operate 11 clinics in Dallas and Collin counties that serve children, adults, seniors, patients with HIV/AIDS and the homeless.
- In December 2008, WFB provided a \$5.2 million loan to a developer to finance the construction of a 145-unit 9 percent tax credit development located in The Colony,

Texas. The borrower is a single-asset entity created to own and operate the facility. All of the units are restricted to seniors 55 years or older earning between 30 percent and 60 percent of the area's median family income.

El Paso MSA: The volume and nature of WFB's CD lending had a neutral effect on Lending Test performance in the El Paso MSA. During the evaluation period, the bank originated nine CD loans totaling \$6.4 million and equal to 2.8 percent of allocated Tier 1 Capital.

Fifty-six percent of these loans were targeted to community services and forty-four percent to economic development needs identified in the El Paso MSA. Forty-four percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the El Paso MSA include the following:

- In May 2012, WFB renewed a \$100,000 working capital line of credit and provided an increase of \$250,000, for a total of \$350,000, for a nonprofit healthcare organization located in a moderate-income census tract in El Paso, Texas. This nonprofit organization was formed to provide community-based primary healthcare with a particular concern for the poor and needy.
- In March 2012, WFB renewed a \$200,000 working capital line of credit for a nonprofit organization located in El Paso, Texas. The \$68,000 represents WFB's 34 percent participation in a working capital line of credit totaling \$200,000; WFB is the lead bank in this loan. This nonprofit offers workforce development programs providing long-term high-skilled training services to El Paso County residents. The focus is on training for high-skill, high-wage jobs, fulfilling both the local industries' need for skilled workers and residents' need for living wage jobs. Participants receive career counseling, support services, training, and post-employment assistance to promote long-term success.

Fort Worth-Arlington MD: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Fort Worth-Arlington MD. During the evaluation period, the bank originated 23 CD loans totaling \$59.5 million and equal to 10.33 percent of allocated Tier 1 Capital.

Seventy-eight percent of these loans were targeted to affordable housing, nine percent to community services, and thirteen percent to economic development needs identified in the Fort Worth-Arlington MD. Forty-six percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Fort Worth-Arlington MD include the following:

- In August 2009, WFB renewed an \$800,000 line of credit for the purpose of providing working capital to a nonprofit organization located in a moderate-income census tract in Fort Worth, Texas. The borrower provides home ownership opportunities for low-income families. Working under the faith-based principle that no profit should be gained from assisting those in need, the mission of the organization is to eliminate poverty housing and to make decent, affordable shelter for all people a matter of conscience.
- In August 2011, WFB provided an \$8.5 million construction loan for the purpose of funding the redevelopment of a 100-unit LIHTC affordable housing complex located in a low-income census tract in Fort Worth, Texas. This limited partnership is affiliated with a development, construction, and management company that specializes in both the new construction and preservation of affordable housing through the LIHTC and Section 8 programs.

Houston-Sugar Land-Baytown MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Houston-Sugar Land-Baytown MSA. During the evaluation period, the bank originated 36 CD loans totaling \$202.4 million and equal to 9.83 percent of allocated Tier 1 Capital.

Sixty-seven percent of these loans were targeted to affordable housing, six percent to community services, seventeen percent to economic development, and ten percent to stabilization and revitalization efforts identified as needs in the Houston-Sugar Land-Baytown MSA. Thirteen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Houston-Sugar Land-Baytown MSA include the following:

- In September 2009, WFB provided a \$4.0 million loan for the purpose of providing construction financing for a 166-unit single room occupancy apartment LIHTC development located in a moderate-income census tract in Houston, Texas. The units will target persons in transition and will be restricted to tenants earning 60 percent or below of the area's median family income.
- In August 2010, WFB provided a one-year extension on a \$6.3 million loan that was originated for the purpose of providing financing for the redevelopment of a commercial property. The property is located in an area that has been designated as a reinvestment zone by the City of Houston, Texas and is located in a moderate-income census tract. This limited partnership was formed for the express purpose of

purchasing and redeveloping the property. The existing shopping center had experienced a significant loss of tenants over time and occupancy was at 30 percent, while sales tax collections had declined materially. According to the project plan, this landmark high profile project would not have occurred without the creation of the reinvestment zone. The new development is estimated to create approximately 1,300 permanent jobs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Beaumont-Port Arthur, College Station-Bryan, Laredo, San Angelo, San Antonio-New Braunfels, Amarillo, Brownsville-Harlingen, Corpus Christi, Killeen-Temple-Fort Hood, Lubbock, McAllen-Edinburg-Mission, Midland, Odessa, Victoria, Waco, and Wichita Falls MSAs and the Brazos Valley, Hartley County, Southeastern Texas, Yoakum County, Atlanta, Big Spring, Borger, Central Texas, Garza County, Hill County, Kerrville, Montague County, Plainview, and South Texas Non-Metropolitan AAs performance is weaker than the bank's overall **Outstanding** performance under the Lending Test in Texas. Performance in the limited-scope AAs did not influence the Lending Test rating in Texas.

Refer to the Tables 1 through 13 in the Texas section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Texas is rated **Outstanding**. Based on full-scope reviews, the bank's performance is excellent in the Austin-Round Rock-San Marcos, El Paso, and Houston-Sugar Land-Baytown MSAs and Dallas-Plano-Irving and Fort Worth-Arlington MDs.

In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two investments totaling \$5.1 million that benefited the entire state during the evaluation period. WFB has nine ongoing qualified investments originated in prior periods that total \$16.3 million and provide continuing benefit to the entire state. The current and prior period statewide investments are equal to 0.34 percent of allocated Tier 1 Capital allocated to the entire state. The effect on the overall state rating is minimal.

## Conclusions for Areas Receiving Full-Scope Reviews

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

Austin-Round Rock-San Marcos MSA: WFB's Investment Test performance in the Austin-Round Rock-San Marcos MSA is excellent. During the evaluation period, the bank made 60 grants and qualified investments totaling \$25.4 million that are equal to 3.7 percent of allocated Tier 1 Capital. The total included 52 grants and contributions worth \$910,000. WFB has 18 ongoing qualified investments originated in prior periods that total \$25.1 million, are equal to 3.6 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit a good responsiveness to the credit and community economic development needs of the AA. The investments in this AA address the identified need for affordable housing. Investments during the current evaluation period have created over 314 units of affordable housing in the Austin-Round Rock-San Marcos MSA.

Examples of significant investments made in the Austin-Round Rock-San Marcos MSA during the evaluation period are:

- In August 2012, WFB invested \$14.5 million in Allegre Point Apartments located in Austin, Texas. The project is new construction of a 184-LIHTC unit family development community. Of the total, 180 units will be restricted to low- and moderate-income households.
- In November 2008, WFB invested \$750,000 through an EQ2 in a non-profit organization based in Austin, Texas that creates and maintains rental homes for very low, low- and moderate-income working families and provides on-site services that educate, support, and improve the financial standing of the working poor in Austin. WFB's investment was used to make environmentally sustainable property improvements to existing multi-family properties, a commercial facility, and future multi-family properties. These improvements, including adding solar panels and insulation, reduced utility costs and created healthier living and working environments for Foundation Community tenants, clients, and staff.

Dallas-Plano-Irving MD: WFB's Investment Test performance in the Dallas-Plano-Irving MD is excellent. During the evaluation period, the bank made 129 grants and qualified investments totaling \$47 million that are equal to 3.9 percent of allocated Tier 1 Capital. The total included 72 grants and contributions worth \$1.6 million. WFB has 27 ongoing qualified investments originated in prior periods that total \$39 million, are equal to 3.2 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit a good responsiveness to the credit and community economic development needs of the AA. The investments in this AA address a number of identified needs, notably affordable housing predominately through investments in mortgage backed securities and economic development. Investments during the

current and prior evaluation periods have created over 625 units of affordable housing in the Dallas-Plano-Irving MD.

Examples of significant investments made in the Dallas-Plano-Irving MD during the evaluation period are:

- In April 2009, WFB invested \$9.6 million in a NMTC project located in Dallas, Texas. The investment was used for the acquisition and rehab of an existing shopping center that was renovated into the new Torre Vista Shopping Center. This moderate-income area is located in the Southern Sector, which has been targeted by the city of Dallas for revitalization efforts.
- In October 2008, WFB invested \$250,000 in a San Antonio based non-profit CD Financial Institution whose mission is to provide loans to small business owners lacking access to commercial credit. WFB's investment was used to provide funding for the institution's continuing expansion into the Dallas and Fort Worth markets, where there is a growing need for microloans and small business loans.

El Paso MSA: WFB's Investment Test performance in the El Paso MSA is excellent. During the evaluation period, the bank made 17 grants and qualified investments totaling \$6.7 million that are equal to 2.8 percent of allocated Tier 1 Capital. The total included 15 grants and contributions worth \$209,000. WFB has eight ongoing qualified investments originated in prior periods that total \$26.2 million, are equal to 11 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit an excellent responsiveness to the credit and community economic development needs of the AA. The investments in this AA address the identified need for affordable housing predominately through investment in national funds with projects in the AA. Investments during the current evaluation period have created over 142 units of affordable housing.

Examples of significant grants or investments made in the El Paso MSA during the evaluation period are:

- Through its 2010 Priority Markets Initiative, WFB provided a \$75,000 grant to a CD Financial Institution with a mission to facilitate affordable housing, small business and economic development in El Paso and contiguous counties. WFB's Leading the Way Home® Priority Markets Initiative provides grant support for neighborhood stabilization projects that are located in areas designated for revitalization to stimulate growth, stability and investment in distressed areas.
- In July 2010, WFB invested \$5.5 million in the Alamito Gardens Apartments, a 142-unit affordable housing project located in El Paso, Texas. This investment was part of a \$44.8 million investment in the RBC Tax Credit Equity National Fund 12.

Fort Worth-Arlington MD: WFB's Investment Test performance in the Fort Worth-Arlington MD is excellent. During the evaluation period, the bank made 69 grants and qualified investments totaling \$31.3 million that are equal to 5.4 percent of allocated Tier 1 Capital. The total included 39 grants and contributions worth \$992,000. WFB has 20 ongoing qualified investments originated in prior periods that total \$21.5 million, are equal to 3.7 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit an excellent responsiveness to the credit and community economic development needs of the AA. The investments in this AA address a number of identified needs, notably affordable housing through bank investments in mortgage backed securities. Investments during the current and prior evaluation periods have created over 309 units of affordable housing in the Fort Worth-Arlington MD.

Examples of significant investments made in the Fort Worth-Arlington MD during the evaluation period are:

- In August 2011, WFB invested \$10.3 million in Prince Hall Gardens for the redevelopment of an existing Section 8 apartment complex in Fort Worth, Texas. This project will provide 100 units of affordable housing with 100 percent of the units being covered under a 20-year, project-based, Section 8 contract, with 10 units set aside for Special Needs or Veterans. The investment was made through a privately held real estate investment firm engaged in a broad range of real estate related activities.
- In June 2010, WFB invested \$500,000 in a non-profit organization based in Fort Worth, Texas that works to increase the supply of affordable housing for low- and moderate-income families. WFB's investment was used to expand the organizations current REO acquisition and rehab program. The program renovates dilapidated housing stock, improving neighborhoods and creating affordable housing.

Houston-Sugar Land-Baytown MSA: WFB's Investment Test performance in the Houston-Sugar Land-Baytown MSA is excellent. During the evaluation period, the bank made 151 grants and qualified investments totaling \$91.2 million that are equal to 4.4 percent of allocated Tier 1 Capital. The total included 99 grants and contributions worth \$9.3 million. WFB has 40 ongoing qualified investments originated in prior periods that total \$63.5 million that are equal to three percent of allocated Tier 1 Capital and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to the credit and community economic development needs of the AA. The investments in this AA address a number of identified needs, notably affordable housing through WFB investments in mortgage backed securities and revitalization and stabilization. Investments during the current

and prior evaluation periods have created over 839 units of affordable housing in the Houston-Sugar Land-Baytown MSA.

Examples of significant investments made in the Houston-Sugar Land-Baytown MSA during the evaluation period are:

- In September 2009, WFB invested \$750,000 through an EQ2 in a non-profit organization located in Houston, Texas with a mission to help women in crisis by providing integrated, comprehensive services including residential, clinical, and vocational. The organization serves women who have experienced homelessness because of mental illness, abuse, or addiction. WFB's investment was used as bridge financing for the construction of a new 88-unit apartment development that will provide much needed affordable housing to women who graduate from the organization's treatment program.
- In July 2011, WFB invested \$25.5 million in a NMTC for the new construction of a multi-purpose stadium located in Houston, Texas. The project is in a NMTC-qualified highly distressed census tract and serves a severely unemployed population. This project will be a catalyst in revitalizing Downtown Houston and the surrounding communities.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Amarillo, Beaumont-Port Arthur, College Station-Bryan, Corpus Christi, Laredo, McAllen-Edinburg-Mission, San Angelo, and San Antonio-New Braunfels, MSAs and Central Texas and South Texas Non-Metropolitan AAs is not inconsistent with the bank's overall **Outstanding** performance under the Investment Test in Texas. The bank's performance in the Odessa, Victoria, Waco, Brownsville-Harlingen, Lubbock, Killeen-Temple-Fort Hood, Midland, and Wichita Falls MSAs and Brazos Valley, Southeastern Texas, Atlanta, Big Spring, Borger, Garza County, Hartley County, Hill County, Kerrville, Montague County, Plainview, and Yoakum County Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance under the Investment Test for Texas.

Refer to Table 14 in the 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 the state of Texas is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Dallas-Plano-Irving and Fort Worth-Arlington MDs and the Austin-Round Rock-San Marcos and Houston-Sugar Land-Baytown MSAs is good and in the El Paso MSA is excellent.

### Retail Banking Services

Refer to Table 15 in the 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.

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Texas full-scope AAs is excellent.

In the Austin-Round Rock-San Marcos MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering eight middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Dallas-Plano-Irving MD, WFB's distribution of branches is excellent. Delivery systems are accessible to all of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering ten middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the El Paso MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Fort Worth-Arlington MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Houston-Sugar Land-Baytown MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all of WFB's AA.

The percentage distribution of branches in low-income geographies is below the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering 20 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves and is good in low-income geographies and excellent in moderate-income geographies. Overall distribution was improved by bordering branches and is now considered excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Texas full-scope AAs is adequate. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Austin-Round Rock-San Marcos MSA is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened two and closed fourteen branches throughout the AA resulting in a net loss of three branches in moderate-income geographies, three branches in middle-income geographies and six branches in upper-income geographies. The moderate-income branches were in close proximity to each other.

WFB's record of opening and closing branches in the Dallas-Plano-Irving MD is adequate. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed thirty-seven branches throughout the AA resulting in a net loss of four branches in low-income geographies, two branches in moderate-income geographies, seven branches in middle-income geographies, and twenty-three branches in upper-income geographies. The closures were generally due to consolidation of redundant branches acquired in the Wachovia merger.

WFB did not open or close any branches in the El Paso MSA during the evaluation period. WFB's record of opening and closing branches in the Fort Worth-Arlington MD is good. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed eighteen branches throughout the AA resulting in a net loss of seven branches in moderate-income geographies, four branches in middle-income geographies and six branches in upper-income geographies. The closures were generally due to consolidation of redundant branches acquired in the Wachovia merger. The distribution of the remaining branches was excellent.

WFB's record of opening and closing branches in the Houston-Sugar Land-Baytown MSA is good. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB opened one and closed thirty-two branches throughout the AA resulting in a net loss of four branches in low-income geographies, one branch in a moderate-income geography, four branches in middle-income geographies, and twenty-two branches in upper-income geographies. The closures were generally due to consolidation of redundant branches acquired in the Wachovia merger.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of Texas full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Austin-Round Rock-San Marcos MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 85 percent of branches located in those geographies maintained Saturday hours compared to 87 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Dallas-Plano-Irving MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 84 percent of branches located in those geographies maintained Saturday hours compared to 91 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the El Paso MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 33 percent of branches maintained Saturday hours in those geographies compared to 100 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Fort Worth-Arlington MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 81 percent of branches located in those geographies maintained Saturday hours compared to 98 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Houston-Sugar Land-Baytown MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 83 percent of branches located in those geographies maintained Saturday hours compared to 93 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Texas full-scope AAs.

In the Austin-Round Rock-San Marcos MSA, WFB is a leader in providing CD services. WFB employees provided a total of 1,405 hours of CD services. These hours

represented 229 CD service activities that benefited 28 different organizations and amounted to slightly more than four and a half hours of CD services per branch per year. Forty percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Austin-Round Rock-San Marcos MSA include the following:

- A WFB employee serves on the board of directors of a nonprofit organization that empowers low-income families and individuals with the tools they need to succeed.
- A WFB employee serves on the board of directors of a CD Corporation formed in 2004 to expand opportunities for low- and moderate-income families of the greater Central Texas area.

In the Dallas-Plano-Irving MD, WFB provides a relatively high level of CD services. WFB employees provided a total of 1,848 hours of CD services. These hours represented 421 CD service activities that benefited 63 different organizations and amounted to slightly more than three and a half hours of CD services per branch per year. Fourteen percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Dallas-Plano-Irving MD include the following:

- WFB employees provide financial literacy classes to clients of a non-profit, tax-exempted corporation that delivers quality affordable housing to stimulate the revitalization of West Dallas and develop a healthy and safe community.
- WFB employees provide homebuyer workshops at designated Community Action Agency Centers. These centers provide a foundation to enable low-income families and adults to move from poverty to self-sufficiency; improve their lives through community revitalization; own a stake in the community by identifying needs; establish and meet goals; learn, expand and navigate social service and other service networks through community needs assessment; and achieve family stability.

In the El Paso MSA, WFB is a leader in providing CD services. WFB employees provided a total of 813 hours of CD services. These hours represented 132 CD service activities that benefited 32 different organizations and amounted to almost fourteen hours of CD services per branch per year. Thirty-five percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the El Paso MSA include the following:

- A WFB employee serves as chairperson of the board of directors of an organization whose purpose is to assist low-income individuals and areas through affordable home loans, small business loans and programs for furthering the individuals' education.
- A WFB employee serves on the board of directors of an organization with a mission to improve the workforce development for unemployed and underemployed low-income persons in El Paso.

In the Fort Worth-Arlington MD, WFB provides a relatively high level of CD services. WFB employees provided a total of 1146 hours of CD services. These hours represented 258 CD service activities that benefited 34 different organizations and amounted to almost four hours of CD services per branch per year. Of the CD service activities, 23.3 percent were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Fort Worth-Arlington MD include the following:

- WFB employees provide financial expertise to an organization that offers down payment assistance and housing counseling services as well as affordably priced new and remodeled homes to moderate-income families.
- WFB employees provide Hands On Banking training to students identified by their schools as those who need assistance beyond the scope of services provided by schools in order to succeed in school and stay in school. Students meet federal poverty guidelines and most come from homes where no one has graduated from high school.

In the Houston-Sugar Land-Baytown MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 2,322 hours of CD services. These hours represented 545 CD service activities that benefited 79 different organizations and amounted to slightly more than two and a half hours of CD services per branch per year. Sixteen percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Houston-Sugar Land-Baytown MSA include the following:

- A WFB employee is on the board of directors of an organization committed to advancing the lives of at-risk and disadvantaged youth and families through an array of innovative programs of excellence in the areas of education and health and human services.

- A WFB employee serves on the board of directors of a CD corporation dedicated to revitalizing Houston's Washington Avenue and Near Northside Community by developing affordable housing and economic opportunities. The organization's programs include the development of single-family homes for purchase by low-income families, free homebuyer education and counseling to help working families purchase their own homes, the development and operation of rental housing and supportive services, and the promotion of economic development in the target community.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the College Station-Bryan, Corpus Christi, Laredo, Lubbock, and Wichita Falls MSAs and Garza County, Hartley County, Kerrville, Montague County, South Texas, and Yoakum County Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in Texas.

Performance under the Service Test in Brownsville-Harlingen and Victoria MSAs and the Big Spring, Borger, and Hill County Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Texas. Performance under the Service Test in Amarillo, McAllen-Edinburg-Mission, Midland, San Angelo, San Antonio-New Braunfels, Waco, Beaumont-Port Arthur, Killeen-Temple-Fort Hood, and Odessa MSAs and Atlanta, Brazos Valley, Central Texas, Plainview, and Southeastern Texas Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Texas. Performance in limited-scope areas did not influence the Service Test performance in Texas.

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

## State of Virginia Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs in its full-scope Virginia AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Virginia AAs.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different size within its full-scope Virginia AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investment and grants within its full-scope Virginia AAs.
- Responsiveness of WFB's investments to credit and community economic development needs within its full-scope Virginia AAs was adequate.
- WFB's delivery systems are accessible to essentially all portions of WFB's full-scope Virginia AAs.

## Description of Institution's Operations in the State of Virginia

Of the bank's 54 state and multistate rating areas, Virginia ranks fourteenth and accounts for two percent of total bank deposits, or \$16.9 billion as of June 30, 2012. WFB has 16 defined AAs in Virginia, which include 90 of the 134 total counties in the state. The state of Virginia rating area does not include the 15 counties in the Washington-Arlington-Alexandria, DC-VA-MD Multistate MD. Within the state, WFB operates 194 branches. WFB is the second largest banking institution in Virginia with 12.6 percent of the deposit market share. Primary competitors include Bank of America, NA and Branch Banking and Trust Company (BB&T) with deposit market shares of 11.6 percent and 9.8 percent, respectively.

Because WFB's branches in Virginia have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of Virginia

Of WFB's 16 AAs in Virginia, the Richmond and Virginia Beach-Norfolk-Newport News MSAs were selected for full-scope review. These AAs account for 61 percent of the bank's state deposits and are the most significant AAs in the state.

Refer to the market profile for the Richmond MSA and Virginia Beach-Norfolk-Newport News MSA 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 Virginia is rated **Outstanding**. Based on full-scope reviews, the bank's performance in the Richmond and Virginia Beach-Norfolk-Newport News MSA is excellent.

### Lending Activity

Refer to Appendix E for the facts and data used to evaluate the bank's lending activity.

The level of lending activity in Virginia full-scope AAs is excellent.

**Richmond MSA:** WFB's lending activity in the Richmond MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans and small loans to businesses and farms is equal to or exceeds its ranking or percentage market share of deposits.

**Virginia Beach-Norfolk-Newport News MSA:** WFB's lending activity in the Virginia Beach-Norfolk-Newport News MSA reflects excellent responsiveness to the AA's credit needs. The level of lending activity as measured by WFB's ranking or percentage market share for home purchase, home improvement, and refinance loans, and small loans to businesses is equal to or exceeds its ranking or percentage market share of deposits. The level of lending activity as measured by WFB's ranking or percentage market share for small loans to farms is reasonably near its ranking or percentage market share of deposits. We considered the effect of a large non-deposit-taking credit card bank in our assessment of WFB's small loans to business lending activity in the MSA.

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

Geographic distribution of loans in Virginia full-scope AAs is good. We revised our conclusions to reflect performance context factors identified in the Richmond and Virginia Beach-Norfolk-Newport News MSAs. For more information, please refer to the discussion of performance for the specific AA.

### ***Home Mortgage Loans***

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

Richmond MSA: WFB's distribution of home purchase loans by income level of the geography in the Richmond MSA is adequate. Its distribution of home purchase loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies is reasonably near its overall market share.

WFB's distribution of home improvement loans by income level of the geography in the Richmond MSA is adequate. Its distribution of home improvement loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Richmond MSA is poor. Its distribution of home refinance loans in low-income geographies is significantly lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home refinance loans in moderate-income geographies is reasonably near its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to the economic and demographic conditions discussed in the Richmond MSA Market Profile, we determined that distribution of home refinance loans compared to the percent of owner-occupied housing units in low- and moderate-income geographies should be considered adequate. WFB's distribution of home refinance loans by income level of the geography in the Richmond MSA was revised and is now considered adequate as a result of these performance context factors.

Virginia Beach-Norfolk-Newport News MSA: WFB's distribution of home purchase loans by income level of the geography in the Virginia Beach-Norfolk-Newport News MSA is good. Its distribution of home purchase loans in low-income geographies is reasonably near the percent of owner-occupied housing units in low-income geographies. WFB's market share of home purchase loans in low-income geographies is somewhat lower than its overall market share. WFB's geographic distribution of home purchase loans in moderate-income geographies approximates the percent of owner-occupied housing units in moderate-income geographies. Its market share of home purchase loans in moderate-income geographies exceeds its overall market share.

However, when we assessed performance in low- and moderate-income geographies relative to moderately severe economic and demographic conditions discussed in the Richmond MSA Market Profile, we determined that distribution of home purchase loans compared to the percent of owner-occupied housing units in low-income geographies should be considered excellent. WFB's distribution of home purchase loans by income level of the geography in the Richmond MSA was revised and is now considered excellent as a result of these performance context factors.

WFB's distribution of home improvement loans by income level of the geography in the Virginia Beach-Norfolk-Newport News MSA is adequate. Its distribution of home improvement loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home improvement loans in low-income geographies is reasonably near its overall market share. WFB's geographic distribution of home improvement loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income geographies. WFB's market share of home improvement loans in moderate-income geographies is somewhat lower than its overall market share.

WFB's distribution of home refinance loans by income level of the geography in the Virginia Beach-Norfolk-Newport News MSA is good. Its distribution of home refinance loans in low-income geographies is somewhat lower than the percent of owner-occupied housing units in low-income geographies. WFB's market share of home refinance loans in low-income geographies exceeds its overall market share. WFB's geographic distribution of home refinance loans in moderate-income geographies is somewhat lower than the percent of owner-occupied housing units in moderate-income

geographies. WFB's market share of home refinance loans in moderate-income geographies exceeds its overall market share.

### ***Small Loans to Businesses***

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

Richmond MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Richmond MSA is good. The bank's distribution of small loans to businesses in low-income geographies is reasonably near the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is somewhat lower than the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income geographies is reasonably near to its overall market share of such loans in the AA.

Virginia Beach-Norfolk-Newport News MSA: WFB's geographic distribution of small loans to businesses by income level of the geography in the Virginia Beach-Norfolk-Newport News MSA is good. The bank's distribution of small loans to businesses in low-income geographies is somewhat lower than the percent of businesses in low-income geographies. Additionally, the bank's market share of small loans to businesses in low-income geographies is reasonably near its overall market share of such loans in the AA. The bank's distribution of small loans to businesses in moderate-income geographies is reasonably near the percent of businesses in moderate-income geographies. Additionally, the bank's market share of small loans to businesses in moderate-income census is reasonably near to its overall market share of such loans in the AA.

### ***Small Loans to Farms***

Refer to Table 7 in the Virginia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

We did not assess geographic distribution of small loans to farms in the Richmond and Virginia Beach-Norfolk-Newport News MSAs because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

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

Distribution of loans by income level of the borrower in Virginia full-scope AAs is good.

### ***Home Mortgage Loans***

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

Richmond MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Richmond MSA is good. Its distribution of loans to low-income borrowers is reasonably near the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home purchase loans to moderate-income borrowers is reasonably near its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Richmond MSA is excellent. Its distribution of home improvement loans to low-income borrowers is near to the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Richmond MSA is good. Its distribution of home refinance loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers exceeds its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers approximates the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers exceeds its overall market share.

Virginia Beach-Norfolk-Newport News MSA: WFB's borrower distribution of home purchase loans by income level of the borrower in the Virginia Beach-Norfolk-Newport News MSA is good. Its distribution of loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home purchase loans to low-income borrowers is somewhat lower than its overall market share. WFB's borrower distribution of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home

purchase loans to moderate-income borrowers substantially meets its overall market share.

WFB's borrower distribution of home improvement loans by income level of the borrower in the Virginia Beach-Norfolk-Newport News MSA is good. Its distribution of home improvement loans to low-income borrowers is somewhat lower than the percent of low-income families within the AA. WFB's market share of home improvement loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families within the AA. Its market share of home improvement loans to moderate-income borrowers exceeds its overall market share.

WFB's borrower distribution of home refinance loans by income level of the borrower in the Virginia Beach-Norfolk-Newport News MSA is good. Its distribution of home refinance loans to low-income borrowers is lower than the percent of low-income families within the AA. WFB's market share of home refinance loans to low-income borrowers is reasonably near its overall market share. WFB's borrower distribution of home refinance loans to moderate-income borrowers approximates the percent of moderate-income families within the AA. Its market share of home refinance loans to moderate-income borrowers exceeds its overall market share.

### ***Small Loans to Businesses***

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

Richmond MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Richmond MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is somewhat lower than the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

Virginia Beach-Norfolk-Newport News MSA: WFB's distribution of small loans to businesses based on the revenue size of the businesses in the Virginia Beach-Norfolk-Newport News MSA is good. WFB's percentage of loans to businesses with gross annual revenue of \$1 million or less is reasonably near the percentage of small businesses in the AA. WFB's market share of loans to businesses with gross annual revenue of \$1 million or less exceeds its overall business loan market share.

### ***Small Loans to Farms***

Refer to Table 12 in the Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

We did not assess borrower distribution of small loans to farms in the Richmond and Virginia Beach-Norfolk-Newport News MSAs because the number of loans originated in the AAs was insufficient for meaningful analysis. Community contacts did not indicate that small loans to farms were a significant need in the AAs.

### **CD Lending**

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

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Virginia full scope AAs. We considered the shorter evaluation period for the AAs in the state of Virginia when assessing the effect of CD lending on performance.

Virginia Statewide: The volume and nature of WFB's CD lending to organizations that serve the entire state had a positive effect on Lending Test performance in Virginia. During the evaluation period, the bank originated three CD loans totaling \$20.5 million and equal to 1.07 percent of allocated Tier 1 Capital allocated to the entire state of Virginia.

Richmond MSA: The volume and nature of WFB's CD lending had a significantly positive effect on Lending Test performance in the Richmond MSA. During the evaluation period, the bank originated ten CD loans totaling \$111.8 million and equal to 16.7 percent of allocated Tier 1 Capital.

Of the ten loans originated in the AA, eight addressed the identified need for affordable housing and two addressed the identified need for community services. Ten percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Richmond MSA include the following:

- In January 2011, WFB renewed a \$100,000 working capital line of credit to a nonprofit organization in Richmond, Virginia. The borrower is a nonprofit corporation that was formed in 1988 for the purpose of providing permanent housing and support services for people who are homeless, veterans, or those who have disabilities, in order to help them become more independent. The homeless individuals and families they serve represent the very lowest levels of income in the region.

Virginia Beach-Norfolk-Newport News MSA: The volume and nature of WFB's CD lending had a positive effect on Lending Test performance in the Virginia Beach-Norfolk-Newport News MSA. During the evaluation period, the bank originated three CD loans totaling \$35.1 million and equal to seven percent of allocated Tier 1 Capital.

All three of the loans originated in the AA addressed the identified need for affordable housing. Thirty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Virginia Beach-Norfolk-Newport News MSA include the following:

- In November 2011, WFB provided a \$4.8 million loan for the purpose of funding the acquisition and renovation of a 132-unit LIHTC affordable housing development located in a low-income census tract in Chesapeake, Virginia. The units, consisting of 90 two-bedroom units and 42 three-bedroom units, will be restricted to low- and moderate-income tenants.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Prince Edward County Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance under the Lending Test in Virginia. In the Charlottesville, Danville, Harrisonburg, Roanoke, Winchester, Blacksburg-Christiansburg-Radford, Kingsport-Bristol-Bristol, and Lynchburg MSAs and the Northwestern Virginia, Martinsville-Henry County, Northern Virginia, Southside Virginia, and Western Virginia Non-Metropolitan AAs performance is weaker than the bank's overall **Outstanding** Lending Test performance in the state. Performance in the limited-scope AAs did not influence the Lending Test rating in Virginia.

Refer to the Tables 1 through 13 in the Virginia section of Appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

WFB's Investment Test performance in Virginia is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Richmond MSA is good and in the Virginia Beach-Norfolk-Newport News MSA is excellent.

We considered the shorter evaluation period for AAs in the state of Virginia in our assessment of CD qualified investments.

### Conclusions for Areas Receiving Full-Scope Reviews

Refer to Table 14 in the Virginia section of Appendix D for the facts and data used to evaluate the bank's level of qualified investments. We considered the shorter evaluation period for the AAs in the state of Virginia when assessing the effect of CD investments on performance.

Virginia Statewide: In addition to the investments and grants made in the full- and limited-scope AAs, WFB made two grants and investments totaling \$5.1 million that benefited the entire state during the evaluation period. WFB has one ongoing qualified investment originated in prior periods of \$4.8 million that provides continuing benefit to the entire state. The current and prior period statewide investments represent approximately 0.5 percent of allocated Tier 1 capital allocated to the entire state. The effect on the overall state rating was minimal.

Richmond MSA: WFB's Investment Test performance in the Richmond MSA is good. During the evaluation period, the bank made 145 grants and qualified investments totaling \$18.8 million that are equal to 2.8 percent of allocated Tier 1 Capital. The total included 100 grants and contributions worth \$1.7 million. WFB has 11 ongoing qualified investments originated in prior periods that total \$14.1 million, are equal to 2.1 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit adequate responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing, primarily through investments in mortgage backed securities, and economic development. Investments during the current evaluation period have created over 216 units of affordable housing in the Richmond MSA.

Examples of significant investments made in the Richmond MSA during the evaluation period include the following:

- In April 2012, WFB invested \$200,000 through an EQ2 in a CD Fund, based in Richmond, Virginia, that provides technical assistance and redevelopment/construction financing to nonprofit and government affordable housing developers throughout the state of Virginia. The Fund operates a NMTC

program and provides technical assistance and predevelopment/construction financing to affordable housing developers that partner with a Virginia CD Corporation.

- In 2011, WFB provided a \$90,000 grant to a private, non-profit CD corporation with a mission to change lives and transform communities through high quality, affordable housing.

Virginia Beach-Norfolk-Newport News MSA: WFB's Investment Test performance in the Virginia Beach-Norfolk-Newport News MSA is excellent. During the evaluation period, the bank made 65 grants and qualified investments totaling \$30.8 million that are equal to 6.2 percent of allocated Tier 1 Capital. The total included 47 grants and contributions worth \$726,000. WFB has 15 ongoing qualified investments originated in prior periods that total \$26.5 million, are equal to 5.3 percent of allocated Tier 1 Capital, and provide continuing benefit to the community.

WFB's investments exhibit good responsiveness to credit and community economic development needs. The investments in this AA address the identified need for affordable housing. Investments during the current evaluation period have created over 1,298 units of affordable housing in the Virginia Beach-Norfolk-Newport News MSA.

Examples of significant investments made in the Virginia Beach-Norfolk-Newport News MSA during the evaluation period include the following:

- In June 2011, WFB invested \$405,268 in the Cedar Grove Apartments, a 32-unit affordable housing project for disabled veterans in Virginia Beach, Virginia. This will be the first development of its kind in Virginia Beach. The project was part of a \$9.3 million investment in the Housing Equity Fund of Virginia XV, L.L.C., and a low-income housing tax credit fund sponsored by the Virginia CD Corporation. The Virginia CD Corporation, Housing Equity Fund of Virginia XV is a private limited partnership that was formed for the purpose of investing in affordable housing developments in Virginia that qualify for housing tax credits.
- In June 2011, WFB invested \$643,640 in the Warwick Single Room Occupancy Apartments, an 88-unit affordable housing project located in downtown Newport News, Virginia. The funds will be used by an affordable housing organization for the purchase and rehabilitation of the former Hotel Warwick. All units are efficiencies and serve previously homeless individuals.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Blacksburg-Christiansburg-Radford and Roanoke MSAs is not inconsistent with the bank's overall **High Satisfactory** performance under the Investment Test in Virginia.

The bank's performance in the Northwestern Virginia, Prince Edward County, and Western Virginia Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance under the Investment Test for Virginia. The bank's performance in the Kingsport-Bristol-Bristol, Lynchburg, Charlottesville, Winchester, Danville, and Harrisonburg MSAs and Martinsville-Henry County, Northern Virginia, and Southside Virginia Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance under the Investment Test for Virginia. Performance in the limited-scope AAs did not influence the Investment Test rating in Virginia. Refer to Table 14 in the 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 under the Service Test in the state of Virginia is rated **High Satisfactory**. Based on full-scope reviews, the bank's performance in the Richmond MSA is adequate and in the Virginia Beach-Norfolk-Newport News MSA is excellent.

### Retail Banking Services

Refer to Table 15 in the 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.

### *Accessibility of Delivery Systems*

WFB's distribution of branches in Virginia full-scope AAs is good.

In the Richmond MSA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all portions of WFB's AA.

The percentage distribution of branches in low-income geographies is lower than the percentage of the population residing in these geographies and is poor. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when considering seven middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- and moderate-income geographies although the conclusion remained the same.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

In the Virginia Beach-Norfolk-Newport News MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's AA.

The percentage distribution of branches in low-income geographies is somewhat lower than the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good. However, when considering 12 middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low-income geographies and is good and in moderate-income geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the AA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Virginia full-scope AAs. WFB has not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals.

WFB's record of opening and closing branches in the Richmond MSA is adequate. WFB has generally not adversely affected the accessibility of its delivery systems particularly in low- and moderate-income geographies and to low- and moderate-income individuals. During the evaluation period, WFB closed two branches throughout the AA resulting in a net loss of one branch in a moderate-income geography and one branch in an upper-income geography.

WFB's record of opening and closing branches in the Virginia Beach-Norfolk-Newport News MSA did not affect the accessibility of its delivery systems in a negative or positive way. During the evaluation period, WFB opened one and closed two branches throughout the AA resulting in a net loss of one branch in an upper-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch operating hours are good and do not vary in a way that inconveniences portions of Virginia full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences portions of the Richmond MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 75 percent of branches located

in those geographies maintained Saturday hours, compared to 98 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences certain portions of the Virginia Beach-Norfolk-Newport News MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 91 percent of branches located in those geographies maintained Saturday hours, compared to 77 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Virginia full-scope AAs. We considered the shorter evaluation period for AAs in the state of Virginia in our assessment of CD services.

In the Richmond MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 454 hours of CD services. These hours represented 114 CD service activities that benefited 29 different organizations and amounted to almost three hours of CD service per branch per year. Twenty-four percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Richmond MSA include the following:

- WFB employees provided financial education for the clients of an organization that assists welfare recipients in transitioning from welfare to work and ultimately self-sufficiency. The organization helps clients comply with the work requirements while providing case management, crisis intervention and supportive services to assist in overcoming barriers.
- WFB employees provided financial education to clients of numerous other organizations that promote affordable housing or offer guidance and assistance to low- and moderate-income individuals or families.

In the Virginia Beach-Norfolk-Newport News MSA, WFB provides an adequate level of CD services. WFB employees provided a total of 249 hours of CD services. These hours represented 64 CD service activities that benefited 20 different organizations and amounted to about one and a half hours of CD service per branch per year. Nine percent of the CD service activities were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Virginia Beach-Norfolk-Newport News MSA include the following:

- A WFB employee serves on the board of directors of non-profit corporation formed in 1983 to promote commercial and industrial growth throughout Virginia and eastern North Carolina. The organization serves as a resource for small businesses in need of permanent financing to acquire fixed assets.

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

Performance under the Service Test in the Northern Virginia Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Virginia.

Performance under the Service Test in the Blacksburg-Christiansburg-Radford, Harrisonburg, Kingsport-Bristol-Bristol, Lynchburg, Roanoke, and Winchester MSAs and Southside Virginia and Western Virginia Non Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Virginia. Performance under the Service Test in the Charlottesville and Danville MSAs and the Northwestern Virginia, Martinsville-Henry County, and Prince Edward County Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Virginia. Performance in limited-scope areas did not influence the Service Test performance in Virginia.

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

## OTHER RATING AREAS

Allentown-Bethlehem-Easton, (Pennsylvania-New Jersey) Multistate MSA

Augusta-Richmond County, (Georgia-South Carolina) Multistate MSA

Columbus, (Georgia-Alabama) Multistate MSA

Davenport-Moline-Rock Island (Iowa-Illinois) Multistate MSA

Fargo (North Dakota-Minnesota) Multistate MSA

Grand Forks (North Dakota-Minnesota) Multistate MSA

Logan (Utah-Idaho) Multistate MSA

Memphis (Tennessee-Mississippi) Multistate MSA

Omaha-Council Bluffs (Nebraska-Iowa) Multistate MSA

Portland-Vancouver-Hillsboro (Oregon-Washington) Multistate MSA

Texarkana (Texas)-Texarkana (Arkansas) Multistate MSA

State of Alabama

State of Alaska

State of Arkansas

State of Connecticut

State of Delaware

State of Idaho

State of Illinois

State of Indiana

State of Iowa

State of Kansas

State of Maryland

State of Michigan

State of Minnesota

State of Mississippi

State of Montana

State of Nebraska

State of New Mexico

State of New York

State of North Dakota

State of Ohio

State of Oregon

State of South Carolina

State of South Dakota

State of Tennessee

State of Utah

State of Washington

State of Wisconsin

State of Wyoming

## **Allentown-Bethlehem-Easton (Pennsylvania-New Jersey) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: Satisfactory**

**The Lending Test is rated: Outstanding**

**The Investment Test is rated: Low Satisfactory**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects good penetration throughout the AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within the AA.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an adequate level of qualified CD investments and grants within the AA.
- To the extent changes have been made, WFB's record of opening and closing branch offices has generally not adversely affected the accessibility of its delivery systems within its AA, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

### **Description of Institution's Operations in Allentown-Bethlehem-Easton MSA**

Of the bank's 54 state and multistate rating areas, Allentown-Bethlehem-Easton MSA ranks 31<sup>st</sup> and accounts for 0.4 percent of total bank deposits, or \$3.39 billion as of June 30, 2012. WFB's AA includes the entire MSA. Within the multistate MSA, WFB operates 46 branches. WFB is the largest banking institution in the Allentown-Bethlehem-Easton MSA with 23.2 percent of the deposit market share. Primary competitors include National Penn Bank, and PNC Bank, NA, with deposit market shares of 11.3 percent and 10.4 percent, respectively.

Because WFB's branches in the Allentown-Bethlehem-Easton MSA have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. CD lending and investment opportunities statewide in both New Jersey and Pennsylvania were limited by the downturn in the economy during the evaluation period. Due to government cutbacks at the federal, state, and local level as a result of falling tax revenues, the nonprofit developers and organizations

that are the source of CD projects were unable to cover the predevelopment costs needed to create viable lending and investment opportunities. We considered performance context factors in our evaluation of CD lending and investments and geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## **LENDING TEST**

WFB's Lending Test performance in the Allentown-Bethlehem-Easton MSA is rated **Outstanding**.

### **Lending Activity**

The level of lending activity in the Allentown-Bethlehem-Easton MSA is excellent. It is supported by a good level of activity for home improvement loans and small loans to businesses, an excellent level of activity for home purchase and home refinance loans and small loans to farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

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

Geographic distribution of loans in the Allentown-Bethlehem-Easton MSA is good. We initially concluded that distribution was adequate for home improvement loans, excellent for small loans to farms, good for home purchase and small loans to businesses, and poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and refinance loans is considered excellent and adequate respectively.

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

Distribution of loans by borrower income in the Allentown-Bethlehem-Easton MSA is good. We initially concluded that distribution was good for home purchase loans and small loans to businesses, excellent for home improvement loans and small loans to farms, and adequate for refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to WFB's ranking and number of loans originated relative to all other lenders in

the AA, performance improved and distribution of home refinance loans is considered good.

## CD Lending

The volume and nature of the bank's CD Lending had a neutral effect on performance in Allentown-Bethlehem-Easton MSA. WFB originated \$19.1 million in CD loans equal to 5 percent of allocated Tier 1 Capital. However, when we considered the performance context factors limiting opportunities for CD lending, we determined the level of CD lending was sufficient to have a positive effect on performance.

## INVESTMENT TEST

WFB's Investment Test performance in the Allentown-Bethlehem-Easton MSA is rated **Low Satisfactory**.

WFB's grant and investment volume in the Allentown-Bethlehem-Easton MSA is adequate. During the evaluation period, WFB made 58 investments in the AA totaling \$12.3 million or 3.2 percent of allocated Tier 1 Capital. In addition, one prior period investment totaling \$314,000 or 0.1 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. This prior period investment adds support for the assigned rating. WFB's grants and investments exhibited adequate responsiveness to the identified need for affordable housing within the assessment area.

We considered the effect of the shortened evaluation period and the limited opportunities for investment in our assessment of Investment Test performance.

## SERVICE TEST

WFB's Service Test performance in Allentown-Bethlehem-Easton MSA is rated **High Satisfactory**. Based on a full-scope review, performance in Allentown-Bethlehem-Easton MSA is good.

## Retail Banking Services

### *Accessibility of Delivery Systems*

WFB's distribution of branches in Allentown-Bethlehem-Easton MSA is excellent.

In Allentown-Bethlehem-Easton MSA, delivery systems are readily accessible to all portions of the institution's assessment area

The percentage distribution of branches in low-income geographies is below the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

However, when considering seven middle- and upper-income branches that are in close proximity to low- and moderate-income geographies, accessibility improves and is good in low-income geographies.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in the Allentown-Bethlehem-Easton MSA is adequate. WFB has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals. During the evaluation period, WFB closed three branches throughout the assessment area, resulting in a net loss of one branch in moderate-income and two in middle-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of the Allentown-Bethlehem-Easton MSA, particularly low- and moderate-income geographies and individuals. Fifty-seven percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to 91 percent of located in middle- and upper-income geographies.

### ***CD Services***

WFB provided a good level of CD services in Allentown-Bethlehem-Easton MSA.

WFB provides a relatively high level of CD services. WFB employees provided a total of 336 hours of CD Services. These hours represented 166 CD service activities that benefited 39 different organizations and amounted to slightly more than two and a half hours of CD service per branch per year.

Highlights of WFB's CD services that benefited the Allentown-Bethlehem-Easton MSA include the following:

- A WFB employee provided financial and strategic planning expertise to an affordable housing organization in the Allentown-Bethlehem-Easton MSA.

- Through their board membership, a WFB employee provides financial, fundraising, and budget advice at monthly board meetings for an Allentown-Bethlehem-Easton MSA community services organization.

Refer to Tables 1 - 15 in the Multistate section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Augusta-Richmond County (Georgia-South Carolina) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Low Satisfactory**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an adequate level of qualified CD investments and grants within its AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its AA.

### **Description of Institution's Operations in Augusta-Richmond County, MSA**

Of the bank's 54 state and multistate rating areas, Augusta-Richmond County MSA ranks 41st and accounts for 0.2 percent of total bank deposits, or \$1.5 billion as of June 30, 2012. WFB has one defined AA in the Augusta-Richmond County MSA, which include all six counties in the multistate metropolitan area. Within the multistate MSA, WFB operates 21 branches. WFB is the largest banking institution in Augusta-Richmond County MSA with 20.6 percent of the deposit market share. Primary competitors include Georgia Bank & Trust Company of Augusta and Sun Trust Bank with deposit market shares of 19.0 percent and 9.1 percent, respectively.

Because WFB's branches in the Augusta-Richmond County MSA have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. We considered performance context factors in our evaluation of geographic and borrower distribution of loans.

## LENDING TEST

WFB's Lending Test performance in the Augusta-Richmond County MSA is rated **High Satisfactory**.

### Lending Activity

The levels of lending activity in the Augusta-Richmond County MSA is good and is supported by an excellent level of activity for home improvement, and refinance loans, a good level of activity for home purchase and small loans to farm and an adequate level of activity for small loans to businesses in relation to WFB's deposit market share.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Augusta-Richmond County MSA is adequate. We initially concluded that distribution was excellent for small loans to farms, good for small loans to businesses, adequate for home purchase, poor for home improvement loans and very poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and refinance loans is good and adequate respectively.

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

Distribution of loans by borrower income in the Augusta-Richmond County MSA is good. We initially concluded that distribution excellent for small loans to farms, good for home purchase, home improvement loans, and small loans to businesses, and adequate for refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home refinance loans is considered good .

### CD Lending

The volume and nature of the bank's CD lending had a neutral effect on performance in Augusta-Richmond County MSA. WFB originated \$4.2 million in CD loans equal to 2.44 percent of allocated Tier 1 Capital. WFB's CD loans were responsive to the need for affordable housing identified in the Augusta-Richmond County MSA.

## INVESTMENT TEST

WFB's Investment Test performance in the Augusta-Richmond County MSA is rated **Low Satisfactory**.

WFB's grant and investment volume in the Augusta-Richmond County MSA is adequate. WFB's investments were responsive to community service and affordable housing needs within the MSA. During the evaluation period, WFB made 41 investments in the AA totaling \$3 million or 1.8 percent of allocated Tier 1 Capital. In addition, two prior period grants and investments totaling \$1.4 million or 0.8 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

## SERVICE TEST

WFB's Service Test performance in Augusta-Richmond County MSA is rated **Low Satisfactory**.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Augusta-Richmond County MSA is adequate.

In Augusta-Richmond County MSA, delivery systems are reasonably accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low-income geographies is significantly below the percentage of the population residing in these geographies and is very poor. The percentage distribution of branches in moderate-income geographies is well below the percentage of the population residing in these geographies and is poor. However, when giving consideration to three branches in middle and upper geographies that are in close proximity to low- and moderate--income geographies, accessibility improves and is adequate.

#### *Changes in Branch Location*

There were no openings or closings in the Augusta-Richmond County MSA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of the Augusta-Richmond County MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income areas, fifty percent of stores located in those geographies maintained Saturday hours, compared to sixty-eight percent of stores located in middle- and upper-income areas.

### **CD Services**

WFB provided a poor level of CD services in Augusta-Richmond County MSA. WFB employees provided a total of 60 hours of CD services. These hours represented 29 different CD services that benefited 14 different organizations, but amounted to only an hour of CD services per branch per year.

Highlights of WFB's CD services that benefited the Augusta-Richmond County MSA include the following:

- A WFB employee participates in Board meetings to offer financial expertise regarding funding options for an affordable housing organization in Augusta-Richmond County MSA. The organization was facing a shortage of funding due to state and local budget cuts.
- A WFB employee provided financial literacy training to students on the importance of managing credit and budgeting at a CD qualified organization in the Augusta-Richmond County MSA.

Refer to Tables 1 - 15 in the Augusta-Richmond County MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## Columbus (Georgia-Alabama) Multistate MSA Rating

### CRA rating for the Multistate MSA: Satisfactory

The Lending Test is rated: **Outstanding**

The Investment Test is rated: **Low Satisfactory**

The Service Test is rated: **High Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of loans reflects adequate penetration throughout its AA.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an adequate level of qualified CD investments and grants within its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.
- WFB provided only a limited level of CD services within its AA.

### Description of Institution's Operations in Columbus MSA

Of the bank's 54 state and multistate rating areas, Columbus MSA ranks 48th and accounts for 0.1 percent of total bank deposits, or \$778 million as of June 30, 2012. WFB has one defined AA in Columbus-GA-AL MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates 14 branches. WFB is the third largest banking institution in Columbus MSA with 11.1 percent of the deposit market share. Primary competitors include Synovus Bank and BB&T Financial, FSB with deposit market shares of 55.7 percent and 12.7 percent, respectively.

Because WFB's branches in the Columbus MSA have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. We considered performance context factors in our evaluation of geographic and borrower distribution of loans.

### LENDING TEST

WFB's Lending Test performance in the Columbus MSA is rated **Outstanding**.

## Lending Activity

The level of lending activity in the Columbus MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans, and small loans to businesses in relation to WFB's deposit market share.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Columbus MSA is adequate. We initially concluded that distribution was excellent for small loans to businesses, and small loans to farms, adequate for home purchase and home improvement loans, and very poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and refinance loans is good and poor respectively.

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

Distribution of loans by borrower income in the Columbus MSA is good. The distribution is excellent for home improvement loans and small loans to farms, good for home purchase and small loans to businesses, and adequate for refinance loans.

## CD Lending

The volume and nature of the bank's CD lending had a significantly positive effect on performance in the Columbus MSA. WFB originated \$9 million in CD loans equal to 10.29 percent of allocated Tier 1 Capital. WFB's CD loans were responsive to the need for affordable housing identified in the Columbus MSA.

## INVESTMENT TEST

WFB's Investment Test performance in the Columbus MSA is rated **Low Satisfactory**.

WFB's grant and investment volume in the Columbus MSA is adequate. WFB's investments were responsive to the need for affordable housing and community services identified within the AA. During the evaluation period, WFB made 19 investments in the AA totaling \$901,000 or 1.0 percent of allocated Tier 1 Capital. In addition, one investments totaling \$1.5 million or 1.8 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. This prior period investment added support

for the assigned rating. WFB's grants exhibited a good level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants that benefited the Columbus MSA include the following:

- WFB made three grants totaling \$90,000 to the Columbus Housing Initiative, now known as NeighborWorks. The funds will help establish a public/private corporation to identify existing, and cultivate new, funding sources dedicated to the development and redevelopment of affordable housing. The funds will also go to the Columbus Cottage program to assist elderly, impoverished residents in danger of becoming homeless.

## **SERVICE TEST**

WFB's Service Test performance in Columbus MSA is rated **High Satisfactory**.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Columbus MSA is excellent. In Columbus MSA, delivery systems are readily accessible to all portions of the MSA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. When giving consideration to three middle and upper income branch locations that are in close proximity to moderate-income geographies overall accessibility improves.

WFB's ATM network offers an excellent alternative delivery system to low-and moderate-income geographies and individuals in the assessment area.

#### ***Changes in Branch Location***

There were no branch openings or closings in the Columbus MSA during the evaluation period.

#### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of the Columbus MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 67 percent of

stores located in those geographies maintained Saturday hours, compared to 88 percent of stores located in middle- and upper-income geographies.

## **CD Services**

WFB provided a poor level of CD services in Columbus MSA.

In the Columbus MSA, WFB provided a limited level of CD services. WFB employees provided a total of 47 hours of CD services. These hours represented 18 different CD services that benefited 10 different organizations, but amounted to slightly more than one hour of CD activities per branch per year.

Refer to Tables 1 - 15 in the Columbus MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Davenport-Moline-Rock Island (Iowa-Illinois) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: 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 the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its AA.

### **Description of Institution's Operations in Davenport-Moline-Rock Island MSA**

Of the bank's 54 state and multistate rating areas, Davenport-Moline-Rock Island MSA ranks 43rd and accounts for 0.1 percent of total bank deposits, or \$1.1 billion as of June 30, 2012. WFB has one defined AA in the Davenport-Moline-Rock Island MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates 17 branches. WFB is the largest banking institution in Davenport-Moline-Rock Island MSA with 16.0 percent of the deposit market share. Primary competitors include Blackhawk Bank & Trust and Quad City Bank and Trust Company with deposit market shares of 11.5 percent and 9.5 percent, respectively.

CD lending and investment opportunities statewide in Illinois were constrained by the downturn in the economy. The nonprofit organizations that are the developers on most CD projects throughout the state suffered significant financial hardship when anticipated revenue from federal, state, and local entities was cut back as a result of falling tax revenues. Without the money to cover basic expenses and predevelopment costs, these organizations were unable to create viable lending and investment opportunities at prerecession levels. Although most states were faced with budget shortfalls, the situation was particularly severe in Illinois.

## **LENDING TEST**

WFB's Lending Test performance in the Davenport-Moline-Rock Island MSA is rated **Outstanding**.

### **Lending Activity**

The level of lending activity in the Davenport-Moline-Rock Island MSA is excellent and is supported by an excellent level of activity for home purchase and refinance loans and small loans to businesses and farms and a good level of activity for home improvement loans in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Davenport-Moline-Rock Island MSA is adequate. The distribution is excellent for small loans to businesses, good for home improvement loans, adequate for home purchase, poor for refinance loans and very poor for small loans to farms.

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

Distribution of loans by borrower income in the Davenport-Moline-Rock Island MSA is good. The distribution is excellent for home purchase and small loans to businesses and good for home improvement loans, refinance loans and small loans to farms.

### **CD Lending**

The volume and nature of the bank's CD lending had a positive effect on performance in Davenport-Moline-Rock Island MSA. WFB originated \$8.1 million in CD loans equal to 6.1 percent of allocated Tier 1 Capital. WFB's CD loans were responsive to the need for affordable housing and community services identified in the Davenport-Moline-Rock Island MSA.

Seventy-five percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA. In addition, when we considered performance context factors that limited opportunities for CD lending, we determined the level of CD lending was sufficient to have a significantly positive effect on lending performance overall.

Highlights of WFB's CD lending that benefited the Davenport-Moline-Rock Island MSA include the following:

- In April 2011, WFB provided a \$50,000 line of credit to a non-profit organization in Davenport, Iowa. The loan was used to cover timing differences between expenses incurred and grants and donations received. This nonprofit organization provides emergency shelter, and transitional and permanent supportive housing programs that offer opportunities for men and women experiencing homelessness to become emotionally, mentally and physically more stable.
- In November 2009, WFB provided a \$150 million line of credit to a Tax Credit Investment Fund. Of the total, \$7.2 million was allocated to a 41-unit affordable housing project located in Davenport, Iowa. Residential units in the project will be restricted to low- and moderate-income households.

## INVESTMENT TEST

WFB's Investment Test performance in the Davenport-Moline-Rock Island MSA is rated **Outstanding**.

WFB's grant and investment volume in the Davenport-Moline-Rock Island MSA is excellent.

During the evaluation period, WFB made 32 investments in the AA totaling \$6.7 million or 5.0 percent of allocated Tier 1 Capital. Additionally, seven prior period grants and investments totaling \$3.6 million or 2.7 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments exhibit adequate responsiveness to the needs identified in the AA. Highlights of WFB investments that benefited the Davenport-Moline-Rock Island MSA include the following:

- WFB made a \$1 million investment during 2009 in a LIHTC to fund the building of the Holiday Court Apartments, a 13-unit affordable housing unit in the assessment area.
- WFB made a \$3.7 million investment during 2012 in a LIHTC to fund the building of the Harrison Lofts, a multifamily project located in the assessment area. This investment was part of a \$14.96 million investment in the RBC Tax Credit Equity National Fund-16, which is a low-income housing tax credit fund.

## **SERVICE TEST**

WFB's Service Test performance in Davenport-Moline-Rock Island MSA is rated "**High Satisfactory.**"

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Davenport-Moline-Rock Island MSA is good.

In Davenport-Moline-Rock Island MSA, delivery systems are accessible to essentially all portions of the bank's assessment area.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is below the percentage of the population residing in these geographies and is adequate.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals in the AA.

#### ***Changes in Branch Location***

There were no openings or closings during the evaluation period in Davenport-Moline-Rock Island MSA.

#### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of the Davenport-Moline-Rock Island MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 67 percent of stores located in those geographies maintained Saturday hours, compared to 88 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Davenport-Moline-Rock Island MSA.

In the Davenport-Moline-Rock Island MSA, WFB provides a relatively high level of CD services. WFB employees provided 239 hours of CD services. These hours represented 39 different CD services that benefited 17 different organizations and amounted to almost three and a half hours of CD services per branch per year. No services were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Davenport-Moline-Rock Island MSA include the following:

- A WFB employee provides financial expertise serving as the Treasurer and Loan Committee member to an affordable housing organization in the Davenport-Moline-Rock Island MSA.
- A WFB employee provided financial literacy training on how to manage credit to a CD qualified organization.

Refer to Tables 1 - 15 in the Davenport-Moline-Rock Island MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Fargo (North Dakota-Minnesota) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.
- WFB provides only a limited level of CD services within its AA.

### **Description of Institution's Operations in the Fargo MSA**

Of the bank's 54 state and multistate rating areas, the Fargo MSA ranks 46th and accounts for 0.1 percent of total bank deposits, or \$804 million as of June 30, 2012. WFB has one defined AA in the Fargo MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates 10 branches. WFB is the second largest banking institution in the Fargo MSA with 14.6 percent of the deposit market share. Primary competitors include State Bank & Trust and U.S. Bank NA with deposit market shares of 29.9 percent and 7.5 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### **LENDING TEST**

WFB's Lending Test performance in the Fargo MSA is rated **Outstanding**.

#### **Lending Activity**

The level of lending activity in the Fargo MSA is excellent and is supported by an excellent level of activity for home purchase and refinance loans and small loans to

farms and a good level of activity for small loans to businesses and home improvement loans in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Fargo MSA is adequate. The distribution is excellent for small loans to businesses, good for home purchase, adequate for home improvement and poor for refinance loans and small loans to farms.

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

Distribution of loans by borrower income in the Fargo MSA is good. The distribution is excellent for home purchase, and good for home improvement loans and loans to small loans to businesses, and adequate for refinance and small loans to farms.

### **CD Lending**

The volume and nature of the bank's CD lending had a neutral effect on performance in the Fargo MSA. WFB originated \$5.4 million in CD loans equal to 6.1 percent of allocated Tier 1 Capital. WFB's CD loans were responsive to the need for affordable housing and community services identified in the Fargo MSA.

## **INVESTMENT TEST**

WFB's Investment Test performance in the Fargo MSA is rated **Outstanding**.

WFB's grant and investment volume in the Fargo MSA is excellent. During the evaluation period, WFB made 12 investments in the AA totaling \$15 million or 16.6 percent of allocated Tier 1 Capital. In addition, seven prior period grants and investments totaling \$1.6 million or 1.8 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's investments and grants exhibit excellent responsiveness to the need for community service and affordable housing identified within the Fargo MSA.

Highlights of WFB investments that benefited the Fargo MSA include the following:

- In June 2011, WFB invested \$15 million in an NMTC for the development of a comprehensive dental and medical clinic in Fargo.

## **SERVICE TEST**

WFB's Service Test performance in Fargo MSA is rated **High Satisfactory**.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Fargo MSA is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low-income and moderate-income geographies significantly exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system for low- and moderate-income geographies and individuals in the assessment area.

#### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Fargo MSA did not affect branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch in the assessment area resulting in a net loss of one branch in a middle-income geography.

#### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are tailored to convenience and needs of the Fargo MSA assessment area, particularly low and moderate-income geographies and individuals. In low and moderate-income geographies, 80 percent of stores located in those geographies maintained Saturday hours, compared to 40 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided a poor level of CD services in Fargo MSA.

In the Fargo MSA, WFB provides a limited level of CD services. WFB employees provided a total of 55 hours of CD services. These hours represented 11 different CD services that benefited six different organizations, but amounted to only slightly more than one hour of service per branch per year. Six services were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Fargo MSA include the following:

- A WFB employee serves as a Board member and provides financial expertise on financials and budgets to an affordable housing organization in the Fargo MSA.
- A WFB employee serves as an executive committee member, provides accounting services, and assists with the completion and submission of grant applications for an affordable housing organization in the Fargo MSA.

Refer to Tables 1 - 15 in the Fargo MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Grand Forks (North Dakota-Minnesota) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Low Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its AA.

### **Description of Institution's Operations in Grand Forks MSA**

Of the bank's 54 state and multistate rating areas, Grand Forks MSA ranks 52nd and accounts for 0.02 percent of total bank deposits, or \$127 million as of June 30, 2012. WFB has one defined AA in the Grand Forks MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates two branches. WFB is the seventh largest banking institution in Grand Forks MSA with 5.4 percent of the deposit market share. Primary competitors include Bremer Bank and Alerus Financial, with deposit market shares of 24.8 percent and 19.1 percent, respectively.

### **LENDING TEST**

WFB's Lending Test performance in the Grand Forks MSA area is rated **High Satisfactory**.

### **Lending Activity**

The level of lending activity in the Grand Forks MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Grand Forks MSA is good. The distribution is good for home purchase and refinance loans, adequate for small loans to businesses, poor for home improvement loans and very poor for small loans to farms.

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

Distribution of loans by borrower income in the Grand Forks MSA is good. The distribution is excellent for small loans to businesses, good for home purchase, adequate for refinance loans and small loans to farms and poor for home improvement.

## **CD Lending**

WFB made no CD loans in the Grand Forks MSA.

## **INVESTMENT TEST**

WFB's Investment Test performance in the Grand Forks MSA is rated **Outstanding**.

WFB's grant and investment volume in the Grand Forks MSA is excellent. During the evaluation period, WFB made one investment and one grant in the AA totaling \$1.7 million or 11.9 percent of allocated Tier 1 Capital. Additionally, three prior period grants and investments totaling \$2.1 million or 14.8 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's investments and grants exhibit an excellent level of responsiveness to the need for affordable housing identified in the Grand Forks MSA.

Highlights of WFB's investments in the Grand Forks MSA include the following:

- In January 2009, WFB purchased a \$1.7 million LIHTC to support the construction of an affordable housing development in the assessment area. The 16-unit development supports the need for additional affordable multifamily housing.
- In December 2011, WFB made a \$9,500 grant to the Housing Authority of the City of Grand Forks. The grant was targeted to support affordable housing vouchers and self-sufficiency programs for low- and moderate-income individuals in the Grand Forks MSA.

## **SERVICE TEST**

WFB's Service Test performance in Grand Forks MSA is rated **Low Satisfactory**.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Grand Forks MSA is adequate.

WFB's delivery systems are reasonably accessible to essentially all portions of the Grand Forks MSA.

The percentage distribution of branches in low- and moderate-income geographies is significantly below the population residing in these geographies and is very poor. WFB does not have any branches in low- and moderate-income geographies. However, when we considered the trade area and the central location of the branches as well as their proximity to moderate-income tracts, we determined that the branches were reasonably accessible.

#### ***Changes in Branch Location***

There were no branch openings or closings in the Grand Forks MSA during the evaluation period.

#### ***Reasonableness of Business Hours and Services***

Operating hours of branches in the AA were the same, regardless of the income level of the geography. There are no branches located in low- or moderate-income geographies.

### **CD Services**

WFB provided a poor level of CD services in the Grand Forks MSA.

In the Grand Forks MSA, WFB provides a limited level of CD services. WFB employees provided a total of 32 hours of CD services. These hours represented 25 CD services that benefited four different organizations, but amounted to only slightly more than one hour of service per branch per year. No services were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Grand Forks MSA include the following:

- WFB employees provided financial literacy training to elementary school students in the AA.

Refer to Tables 1 - 15 in the Grand Forks MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## Logan (Utah-Idaho) Multistate MSA Rating

### CRA rating for the Multistate MSA: 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 the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments that are highly responsive to the needs of its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.

### Description of Institution's Operations in Logan MSA

Of the bank's 54 state and multistate rating areas, the Logan MSA ranks 51st and accounts for 0.02 percent of total bank deposits, or \$199 million as of June 30, 2012. WFB has one defined AA in the Logan MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates seven branches. WFB is the fourth largest banking institution in the Logan MSA, with 16.7 percent of the deposit market share. Primary competitors include Zion's First National Bank Trust and Cache Valley Bank, with deposit market shares of 26.6 percent and 21.2 percent respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans.

### LENDING TEST

WFB's Lending Test performance in the Logan MSA is rated **Outstanding**.

### Lending Activity

The level of lending activity in the Logan MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance

loans and small loans to businesses and farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Logan MSA is good. We initially concluded that distribution was excellent for home refinance loans, good for home purchase loans, adequate for home improvement loans and small loans to businesses and poor for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA and credit demand as indicated by HMDA applications, performance improved and distribution of home purchase loans is considered excellent.

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

Distribution of loans by borrower income in the Logan MSA is good. We initially concluded that distribution was good for home purchase loans and small loans to businesses and farms, adequate for home refinance loans and poor for home improvement loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is considered good.

### **CD Lending**

WFB CD lending had a significantly positive impact on the bank's lending performance. During the evaluation period, WFB originated one loan totaling \$3.8 million and equal to 17.2 percent of allocated Tier 1 Capital. The loan was considered particularly responsive to the need for affordable housing identified in the Logan MSA and had a significantly positive effect on our assessment of CD lending performance in the AA.

## **INVESTMENT TEST**

WFB's Investment Test performance in the Logan MSA is rated **Outstanding**.

WFB's grant and investment volume in the Logan MSA is excellent.

During the evaluation period, WFB made eight investments in the AA totaling \$4.7 million or 21.3 percent of allocated Tier 1 Capital. Additionally, three prior period grants

and investments totaling \$10.6 million or 47.5 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's investments and grants exhibit excellent responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB investments that benefited the Logan MSA include the following:

- WFB invested \$4.4 million in a Community Based Housing Development Organization. The investment helped to fund 40 units of senior housing in the assessment area. The units are restricted to low-and moderate-income senior residents.
- WFB invested \$300,000 in a non-profit housing group for predevelopment financing for affordable housing in the assessment area.

## **SERVICE TEST**

WFB's Service Test performance in Logan MSA is rated **High Satisfactory**.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Logan MSA is excellent.

In Logan MSA, delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. WFB did not have branches in low-income census tracts in the Logan MSA where less than five percent of the total population in the assessment area resides. Therefore, our evaluation was weighted toward performance in the moderate-income geographies.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals.

#### ***Changes in Branch Location***

There were no openings or closings during the evaluation period in Logan MSA.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of the Logan MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of stores located in those geographies maintained Saturday hours, compared to 100 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Logan MSA.

In the Logan MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 62 hours of CD services. These hours represented five different CD services that benefited four different organizations and amounted to slightly more than two hours of service per branch per year. Five services were considered highly responsive to identified community needs. We considered the limited opportunities for CD services in our assessment.

Highlights of WFB's CD services that benefited the Logan MSA include the following:

- A WFB employee serves on the Board and provides financial expertise for a non-profit affordable housing organization in the Logan MSA.
- A WFB employee provided financial literacy training on how to save and manage money to a CD qualified organization.

Refer to Tables 1 - 15 in the Logan MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## Memphis (Tennessee-Mississippi) Multistate MSA Rating

### CRA rating for the Multistate MSA: 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 the following:

- Lending levels reflect excellent responsiveness to the credit needs of WFB's AA.
- The distribution of loans reflects adequate penetration throughout WFB's AA and good penetration among borrowers of different income levels within WFB's AA.
- CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants that are highly responsive to the needs of its AA.
- WFB delivery systems are reasonably accessible to its AA.

### Description of Institution's Operations in Memphis MSA

Of the bank's 54 state and multistate rating areas, the Memphis MSA ranks 50th and accounts for 0.05 percent of total bank deposits, or \$463 million as of June 30, 2012. WFB has one defined AA in the Memphis MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates eight branches. WFB is the eighth largest banking institution in Memphis MSA with 2.0 percent of the deposit market share. Primary competitors include First Tennessee Bank, N.A., and Regions Bank with deposit market shares of 30.3 percent and 16.8 percent, respectively.

Because WFB's branches in the Memphis MSA have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for this AA is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. We considered performance context factors in our evaluation of geographic and borrower distribution of loans

### LENDING TEST

WFB's Lending Test performance in the Memphis MSA is rated **Outstanding**.

## **Lending Activity**

The level of lending activity in the Memphis MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and an adequate level of activity for small loans to farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the large number of farm lenders in the AA.

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

Geographic distribution of loans in the Memphis MSA is adequate. We initially concluded that distribution was poor for home purchase, refinance, and home improvement loans, adequate for small loans to businesses and excellent for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase loans is considered adequate.

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

Distribution of loans by borrower income in the Memphis MSA is good. We concluded that distribution is excellent for small loans to farms, good for home purchase loans and small loans to businesses, adequate for home refinance loans and poor for home improvement loans.

## **CD Lending**

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Memphis MSA. WFB originated \$48 million in CD loans equal to 92.1 percent of allocated Tier 1 Capital. WFB's CD loans were responsive to the need for affordable housing and neighborhood revitalization and stabilization identified in the Memphis MSA.

Thirty-six percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

- In December 2010, WFB provided \$17.4 million in financing for a Recovery Zone Facility Revenue Bond. The funds were used for construction and permanent

financing to acquire and renovate an office tower in Memphis, Tennessee. This project is a NMTC.

## INVESTMENT TEST

WFB's Investment Test performance in the Memphis MSA is rated **Outstanding**.

WFB's grant and investment volume in the Memphis MSA is excellent. During the evaluation period, WFB made 25 investments in the AA totaling \$50.4 million or 96.4 percent of allocated Tier 1 Capital. Additionally, two prior period grants and investments totaling \$3 million or 5.9 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments exhibited an excellent level of responsiveness to the need for affordable housing and neighborhood revitalization and stabilization identified in the AA. Highlights of WFB investments that benefited the Memphis MSA include the following:

- WFB invested \$35.5 million in a NMTC project. The tax credit was made to a certified Community Development Entity (CDE) as part of a revitalization project in a moderate-income census tract in the assessment area. The project has resulted in the creation of over 500 jobs in the assessment area.
- WFB invested \$4.7 million in a LIHTC fund. The investment helped to fund 71 affordable housing units in the assessment area.

## SERVICE TEST

WFB's Service Test performance in Memphis MSA is rated **Low Satisfactory**.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Memphis MSA is adequate.

In Memphis MSA, delivery systems are reasonably accessible to essentially all portions of the Memphis MSA.

The percentage distribution of branches in low- income geographies is significantly below the percentage of the population residing in these geographies and is very poor. The percentage distribution of branches in moderate-income geographies is near to the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals in the AA.

### ***Changes in Branch Location***

There were no branch openings or closings during the evaluation period in Memphis MSA.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences certain portions of the Memphis MSA, particularly moderate-income geographies and individuals. Although there were no branches in low-income geographies, 100 percent of stores located in moderate-income geographies maintained Saturday hours, compared to 33 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided a poor level of CD services in Memphis MSA.

In the Memphis MSA, WFB provides a limited level of CD services. WFB employees provided a total of 17 hours of CD services. These hours represented 11 different CD services that benefited six different organizations, but amounted to less than one hour of service per branch per year. Four services were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Memphis MSA include the following:

- A WFB employee provided financial literacy training for high school students on how to manage credit at a CD qualified organization in the Memphis MSA.
- A WFB employee provided financial literacy training specifically targeted to "banking the unbanked" in low and moderate income individuals to a CD qualified organization in the Memphis MSA.

Refer to Tables 1 - 15 in the Memphis MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Omaha-Council Bluffs (Nebraska-Iowa) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: 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 the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB delivery systems are accessible to essentially all portions of its AA.

### **Description of Institution's Operations in Omaha-Council Bluffs MSA**

Of the bank's 54 state and multistate rating areas, Omaha-Council Bluffs MSA ranks 34th and accounts for 0.4 percent of total bank deposits, or \$3 billion as of June 30, 2012. WFB has one defined AA in the Omaha-Council Bluffs MSA, which includes every county in the multistate metropolitan area. Within the multistate MSA, WFB operates 18 branches. WFB is the third largest banking institution in Omaha-Council Bluffs MSA with 12.7 percent of the deposit market share. Primary competitors include First National Bank of Omaha and Mutual of Omaha Bank with deposit market shares of 27.0 percent and 13.3 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### **LENDING TEST**

WFB's Lending Test performance in the Omaha-Council Bluffs MSA is rated **Outstanding**.

## **Lending Activity**

The level of lending activity in the Omaha-Council Bluffs MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and a good level of activity for small loans to farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Omaha-Council Bluffs MSA is adequate. We initially concluded that distribution was adequate for home improvement loans, and small loans to businesses and farms, poor for home purchase loans and very poor for home refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home refinance loans is now considered.

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

Distribution of loans by borrower income in the Omaha-Council Bluffs MSA is good. The distribution is excellent for small loans to businesses, good for home purchase and home improvement loans, and adequate for home refinance loans and small loans to farms.

## **Community Development Lending**

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Omaha-Council Bluffs MSA. WFB originate \$64.6 million in CD loans equal to 19.1 percent of allocated Tier 1 Capital. WFB's CD loans were responsive to the need for affordable housing and community services identified in the Omaha-Council Bluffs MSA. Forty percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Omaha-Council Bluffs MSA include the following:

- In 2008, 2009, and 2010, WFB purchased participations in a lending pool with a consortium of local banks in Omaha, Nebraska. These funds are being used to provide long-term income restricted mortgage financing for low- and moderate-income borrowers. The success of this organization has helped to support the

missions of several CD corporations working in North and South Omaha, while centralizing certain development functions so that each housing organization will not need to duplicate expertise within individual CD corporations.

- In October 2010, WFB loaned \$13.2 million for construction financing of an 84-unit LIHTC apartment development located in La Vista, Nebraska. The apartments will be restricted to low- and moderate-income households.

## INVESTMENT TEST

WFB's Investment Test performance in the Omaha-Council Bluffs MSA is rated **Outstanding**.

WFB's grant and investment volume in the Omaha-Council Bluffs MSA is excellent. During the evaluation period, WFB made 74 investments in the AA totaling \$61.9 million or 18.3 percent of allocated Tier 1 Capital. Additionally, 22 prior period grants and investments totaling \$11.4 million or 3.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investment exhibited a good level of responsiveness to the need for affordable housing and neighborhood revitalization and stabilization identified in the AA.

Highlights of WFB investments that benefited the Omaha-Council Bluffs MSA include the following:

- WFB invested \$6.7 million for the construction of 33 new single-family rental homes in the assessment area. All of the units are restricted to tenant's earning 60 percent of the area median income or less.
- WFB invested \$5.9 million in a LIHTC that helped to fund a 154 unit affordable housing project in the assessment area.

## SERVICE TEST

WFB's Service Test performance in Omaha-Council Bluffs MSA is rated **High Satisfactory**.

## **Retail Banking Services**

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Omaha-Council Bluffs MSA is excellent.

In Omaha-Council Bluffs MSA, delivery systems are accessible to essentially all portions of the assessment area.

The percentage distribution of branches in low-income geographies is below the percentage of the population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when considering one low-income and one moderate-income bordering branch, the distribution of branches in low-income geographies improved and is considered good.

WFB's ATM network offers an excellent alternative delivery system to low-and moderate-income geographies and individuals through full service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Omaha-Council Bluffs MSA did not affect branch distribution in a negative or positive way. During the evaluation period, WFB closed two branches throughout the assessment area resulting in a net loss of one branch in a moderate-income geography and one branch in a middle-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours are adequate and do not vary in a way that inconveniences portions of the Omaha-Council Bluffs MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 80 percent of stores located in those geographies maintained Saturday hours, compared to 92 percent of stores located in middle- and upper-income geographies.

## **CD Services**

WFB provided an excellent level of CD services in Omaha-Council Bluffs MSA.

In the Omaha-Council Bluffs MSA, WFB is a leader in providing CD services. WFB employees provided a total of 875 hours of CD services. These hours represented 301 different CD services that benefited 58 different organizations and amounted to more

than 11 hours of CD services per branch per year. Five services were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited the Omaha-Council Bluffs MSA include the following:

- A WFB employee serves on the Loan Committee and provides financial expertise in the review of financial reports for an affordable housing organization in Omaha-Council Bluffs MSA.
- A WFB employee provided financial literacy training to students on the importance of managing credit and budgeting at a CD qualified organization in the Omaha-Council Bluffs MSA.

Refer to Tables 1 - 15 in the Omaha-Council Bluffs MSA section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Portland-Vancouver-Hillsboro (Oregon-Washington) Multistate MSA Rating**

### **CRA rating for the Multistate MSA: 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 the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its AA.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB's delivery systems are readily accessible to all portions of its AA.

### **Description of Institution's Operations in the Portland-Vancouver-Hillsboro, MSA**

Of the bank's 54 state and multistate rating areas, Portland-Vancouver-Hillsboro ranks 25th and accounts for 0.7 percent of total bank deposits, or \$6.17 billion as of June 30, 2012. WFB's AA includes the entire MSA. Within the multistate MSA, WFB operates 72 branch offices. WFB is the fourth largest banking institution in the Portland-Vancouver-Hillsboro MSA with 13.5 percent of the deposit market share. Primary competitors include Bank of America and US Bank, NA, with deposit market shares of 17.8 percent and 17.3 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans.

CD lending and investment opportunities statewide in Oregon were constrained by the downturn in the economy. The nonprofit organizations that are the developers on most CD projects throughout Oregon suffered significant financial hardship when anticipated revenue from federal, state, and local entities was cut back as a result of falling tax revenues. Without the money to cover basic expenses and predevelopment costs, these organizations were unable to create viable lending and investment opportunities at prerecession levels. Although most states were faced with budget shortfalls, the situation was particularly severe in Oregon.

## **LENDING TEST**

WFB's Lending Test performance in the Portland-Vancouver-Hillsboro MSA is rated **Outstanding**.

### **Lending Activity**

The level of lending activity in the Portland-Vancouver-Hillsboro MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, refinance, small loans to farms, and small loans to businesses in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Portland-Vancouver-Hillsboro MSA is excellent. The distribution is good for home improvement and refinance loans, excellent for home purchase and small loans to businesses, and poor for small loans to farms.

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

Distribution of loans by borrower income in the Portland-Vancouver-Hillsboro MSA is good. The distribution is good for home purchase and small loans to farms, excellent for small loans to businesses, and adequate for home improvement and refinance loans.

### **CD Lending**

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Portland-Vancouver-Hillsboro MSA. WFB originated \$100 million in CD loans equal to 14.4 percent of allocated Tier 1 Capital.

Twenty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA. In addition, when we considered performance context factors that limited opportunities for CD lending, we determined the level of CD lending was sufficient to have a significantly positive effect on lending performance overall.

Highlights of WFB's CD lending that benefited the Portland-Vancouver-Hillsboro MSA include the following:

- WFB provided a loan to fund construction financing for the acquisition and rehabilitation of an affordable LIHTC housing complex located in a low-income census tract in the MSA.
- WFB provided financing for the construction of a health care clinic serving the homeless and very low-income individuals in the MSA.

## INVESTMENT TEST

WFB's Investment Test performance in the Portland-Vancouver-Hillsboro MSA is rated **Outstanding**.

WFB's grant and investment volume in the Portland-Vancouver-Hillsboro MSA is excellent. During the evaluation period, WFB made 75 investments in the AA totaling \$82.1 million or 12.0 percent of allocated Tier 1 Capital. In addition, 35 prior period grants and investments totaling \$23.0 million or 3.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the needs identified in the AA for affordable housing and community services.

Highlights of WFB's grants and investments that benefited the Portland-Vancouver-Hillsboro MSA include the following:

- WFB provided funding which was used by an affordable housing organization within the MSA to create public and section eight rental-housing units for individuals transitioning out of chronic homelessness.
- The bank invested in a community services organization for the purpose of constructing a new behavioral and primary care clinic that will serve homeless and very low-income individuals.

## SERVICE TEST

WFB's Service Test performance in Portland-Vancouver-Hillsboro MSA is rated **High Satisfactory**. Based on a full-scope review, performance in Portland-Vancouver-Hillsboro MSA is good.

## **Retail Banking Services**

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Portland-Vancouver-Hillsboro MSA is excellent.

In Portland-Vancouver-Hillsboro MSA, delivery systems are readily accessible to all portions of the WFB's assessment area.

The distribution of branches in low- and moderate-income geographies exceeds the population residing in these geographies and is excellent. When giving consideration to eight middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in the Portland-Vancouver-Hillsboro MSA is good. WFB has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or to low- and moderate-income individuals. During the evaluation period, WFB closed two branches throughout the assessment area, resulting in a net loss of one branch in a moderate-income geography and one branch in a middle-income geography. However, distribution remained excellent after the closing.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of Portland-Vancouver-Hillsboro MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 79 percent of stores located in those geographies maintained Saturday hours, compared to 91 percent of stores located in middle- and upper-income geographies.

## **CD Services**

WFB provided a good level of CD services in the Portland-Vancouver-Hillsboro MSA.

WFB provides a relatively high level of CD services. WFB employees provided a total of 932 hours of CD services. These hours represented 218 CD service activities that

benefited 50 different organizations and amounted to slightly more than three hours of CD services per branch per year.

Highlights of WFB's CD services that benefited the Portland-Vancouver-Hillsboro MSA include the following:

- A WFB employee is providing guidance to a struggling non-profit within the MSA and assisting the organization to liquidate its affordable housing portfolio and transfer properties to other more viable non-profits.
- A WFB employee is an active participant on the board of a successful and effective affordable housing organization.

Refer to Tables 1 - 15 in the Multistate section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## **Texarkana (Texas-Arkansas) Multistate MSA Rating**

**CRA rating for the Multistate MSA: Satisfactory**

**The Lending Test is rated: High Satisfactory**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: High Satisfactory**

The major factors that support this rating include the following:

- WFB's lending levels reflect good responsiveness to the credit needs of its AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its AA.
- The distribution of WFB's borrowers reflects adequate penetration among borrowers of different income levels and businesses of different sizes within its AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its AA.
- WFB's delivery systems are accessible to essentially all portions of its AA.

### **Description of Institution's Operations in the Texarkana MSA**

Of the bank's 54 state and multistate rating areas, the Texarkana MSA ranks 47<sup>th</sup> and accounts for 0.1 percent of total bank deposits, or \$779 million as of June 30, 2012. WFB's AA includes the entire MSA. Within the multistate MSA, WFB operates eight branches. WFB is the largest banking institution in the Texarkana MSA with 35.3 percent of the deposit market share. Primary competitors include Regions Bank, and Capital One, NA, with deposit market shares of 11.3 percent and 10.4 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans.

We also considered performance context factors affecting CD lending and investment in the state of Texas. See the Austin-Round Rock-San Marcos MSA Market Profile for performance context factors affecting the opportunities for CD lending and investment in Texas statewide including the Texarkana MSA.

### **LENDING TEST**

WFB's Lending Test performance in the Texarkana MSA is rated **High Satisfactory**.

## **Lending Activity**

The level of lending activity in the Texarkana MSA is good and is supported by a good level of activity for home purchase, refinance, and small loans to farms, and an adequate level of activity for home improvement and small loans to businesses in relation to WFB's deposit market share. Our assessment of lending activity was influenced by the presence of significant lenders in the area that do not have deposit-taking facilities

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

Geographic distribution of loans in the Texarkana MSA is adequate. The distribution is adequate for refinance and small loans to farms, excellent for small loans to businesses, and poor for home purchase and home improvement loans.

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

Distribution of loans by borrower income in the Texarkana MSA is adequate. The distribution is adequate for home purchase loans, good for home improvement and small loans to businesses, and poor for refinance and small loans to farms.

## **CD Lending**

The volume and nature of the bank's CD Lending had a significantly positive effect on performance in the Texarkana MSA. WFB originated \$19.8 million in community development loans in the MSA.

One hundred percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA. In addition, when we considered performance context factors that limited opportunities for CD lending, we determined the level of CD lending was sufficient to have a significantly positive effect on lending performance overall.

Highlights of WFB's CD Lending that benefited the Texarkana MSA include the following:

- WFB provided financing to an affordable housing organization for the purpose of constructing a new multi-family affordable housing development located within the MSA.
- The bank also funded an affordable housing organization's construction of an apartment development located in a low-income census tract within the MSA.

## INVESTMENT TEST

WFB's Investment Test performance in the Texarkana MSA is rated **Outstanding**.

WFB's grant and investment volume in the Texarkana MSA is excellent. During the evaluation period, WFB made four investments in the AA totaling \$31 million or 36.3 percent of allocated Tier 1 Capital. WFB's grants and investments demonstrated an excellent level of responsiveness to the need identified in the AA for affordable housing.

Highlights of WFB's grants and investments that benefited the Texarkana MSA include the following:

- WFB invested in a low income tax credit qualified project within the MSA focused on the rehabilitation of low-income apartments.
- The bank invested in an affordable housing project within the MSA through a national syndicator of low-income housing tax credit projects.

## SERVICE TEST

WFB's Service Test performance in Texarkana MSA is rated **High Satisfactory**. Based on a full-scope review, performance in the Texarkana MSA is good.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Texarkana MSA is good.

In the Texarkana MSA, delivery systems are accessible to essentially all portions of the institution's assessment area.

The distribution of branches in low- income geographies is very poor. WFB has no branches in low-income geographies in the MSA. The distribution of branches in moderate-income geographies exceeds the population residing in these geographies and is excellent.

However, when giving consideration to two middle- and upper-income branches that are in close proximity to low- and moderate-income geographies accessibility improves and is adequate in low-income geographies.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in the Texarkana MSA, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB opened three and closed four branches throughout the assessment area resulting in a net loss of one branch in middle-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours are good and do not vary in a way that inconveniences certain portions of the Texarkana MSA, particularly low- and moderate-income geographies and individuals. One hundred percent of stores located in moderate-income geographies maintained Saturday hours, compared to 67 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Texarkana MSA. WFB provides a relatively high level of CD services. WFB employees provided a total of 69 hours of CD services. These hours represented 31 CD service activities that benefited four different organizations and amounted to slightly more than three hours of CD services per branch per year.

Highlights of WFB's CD services that benefited the Texarkana MSA include the following:

- WFB employees assist with a financial literacy program sponsored by a community services organization for elementary school students within the MSA.
- WFB employees provide budget and credit management expertise to an affordable housing organization operating within the MSA.

Refer to Tables 1 - 15 in the Multistate section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Alabama Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Alabama AAs.
- The geographic distribution of WFB's loans reflects an adequate penetration throughout its full-scope Alabama AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Alabama AAs.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Alabama AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Alabama AAs.
- To the extent changes have been made, WFB's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems within its full-scope Alabama AAs.

## Description of Institution's Operations in the State of Alabama

Of the bank's 54 state and multistate rating areas, Alabama ranks 21st and accounts for 1.0 percent of total bank deposits, or \$8.15 billion as of June 30, 2012. WFB has 17 defined AAs in Alabama, which include 42 out of 67 total counties in the state. Within the state, WFB operates 136 branches. WFB is the third largest banking institution in Alabama with 9.7 percent of the deposit market share. Primary competitors include Regions Bank and Compass Bank, with deposit market shares of 25.0 percent and 11.6 percent, respectively.

Because WFB's branches in the State of Alabama have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### **Scope of Evaluation in the State of Alabama**

Of WFB's 17 AAs in Alabama, the Birmingham-Hoover, Huntsville, and Montgomery MSAs were selected for full-scope review. These AAs account for 59.7 percent of the bank's state deposits and are the most significant AAs in the state.

## **LENDING TEST**

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

WFB's Lending Test performance in Alabama is rated **High Satisfactory**. Based on full-scope reviews, performance in the Birmingham-Hoover MSA is good, the Huntsville MSA is adequate, and the Montgomery MSA is excellent.

### **Lending Activity**

The level of lending activity in Alabama full-scope AAs is excellent. The level of lending activity in the Birmingham-Hoover MSA is excellent and is supported by an excellent level of activity for home purchase, refinance, and small loans to farms, a good level of activity for small loans to businesses, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

The level of lending activity in the Huntsville MSA is excellent and is supported by an excellent level of activity for home purchase and refinance loans, an adequate level of activity for home improvement loans and small loans to businesses, and a poor level of activity for small loans to farms in relation to WFB's deposit market share.

The level of lending activity in the Montgomery MSA is excellent and is supported by an excellent level of activity for home purchase, refinance, and small loans to farms, a good level of activity for small loans to businesses, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

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

Geographic distribution of loans in Alabama full-scope AAs is adequate.

In the Birmingham-Hoover MSA, overall geographic distribution of loans is good. We initially concluded that distribution was good for home improvement and small loans to businesses, excellent for small loans to farms, and poor for home purchase and refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase loans is good and refinance loans is adequate.

In the Huntsville MSA, the overall geographic distribution of loans is poor. We initially concluded that the distribution was poor for home purchase and home improvement loans, good for small loans to businesses, very poor for refinance loans, and excellent for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase loans is adequate.

In the Montgomery MSA, the overall geographic distribution of loans is adequate. We initially concluded that distribution was poor for home purchase, home improvement, and refinance loans, good for small loans to businesses and excellent for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA, performance improved and distribution of home purchase and refinance loans is considered adequate.

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

Distribution of loans by borrower income in Alabama is good.

In the Birmingham-Hoover MSA, the overall distribution of loans by borrower income is good. We initially concluded that the distribution was good for home purchase, home improvement, and small loans to businesses, and adequate for refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is considered good.

In the Huntsville MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase and small loans to businesses and adequate for home improvement and refinance loans.

In the Montgomery MSA, the overall distribution of loans by borrower income is adequate. The distribution is adequate for refinance loans, good for home purchase, home improvement, and small loans to businesses. The number of small loans to farms is too small for meaningful analysis.

## **CD Lending**

The volume and nature of the bank's CD lending had a positive effect on performance in Alabama full-scope AAs.

In the Montgomery MSA, WFB's CD loans had a significantly positive effect on lending performance in the MSA. WFB originated \$26.8 million in CD loans equal to 28.28% of allocated Tier 1 Capital. Thirty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

In the Birmingham-Hoover MSA, WFB's CD loans had a neutral effect on lending performance in the MSA. WFB originated \$750,000 in CD loans equal to 0.2 percent of allocated Tier 1 Capital. One hundred percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited Alabama include the following:

- In May 2010, WFB provided a \$250,000 line of credit to a nonprofit organization in Birmingham, Alabama. The funds were used as working capital. The borrower is a nonprofit organization with a history of serving women and their families in the central Alabama area.
- In February 2012, WFB renewed a \$500,000 working capital line of credit for a nonprofit organization located in a low-income census tract in Montgomery, Alabama. This nonprofit organization fights hunger and poverty across central and south Alabama through member agencies by soliciting, procuring, and distributing excess food, grocery and household products; by developing and monitoring agency networks; and by cultivating community awareness and participation.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Auburn-Opelika, Decatur, Dothan, Mobile, and Tuscaloosa MSAs and the Cullman-Marshall, Dallas County, Marion County, Southeastern AL Non-Metropolitan Assessment Areas is not inconsistent with the bank's overall **High Satisfactory** performance in Alabama. Performance under the Lending Test in the Anniston-Oxford, Florence-Muscle Shoals, and Gadsden MSAs and the Baldwin County and Eastern Central Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Alabama. Performance in these limited-scope AAs did not influence the Lending Test performance in Alabama.

## INVESTMENT TEST

WFB's Investment Test performance in Alabama is rated **Outstanding**. Based on full-scope reviews, performance in the Birmingham-Hoover, Montgomery, and Huntsville MSAs is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

WFB's investment volume in the Birmingham-Hoover MSA is excellent. During the evaluation period, WFB made 77 investments in the MSA totaling \$17.6 million or 4.5 percent of allocated Tier 1 Capital. In addition, four prior period investments totaling \$12 million remained outstanding as of year-end 2012. These prior period investments add support for the assigned rating. WFB's grants and investments demonstrated an excellent level of responsiveness to affordable housing and neighborhood stabilization and revitalization needs within the MSA.

WFB's investment volume in the Huntsville MSA is excellent. During the evaluation period, WFB made 24 grants and investments in the MSA totaling \$5.6 million or 8.9 percent of allocated Tier 1 Capital. WFB's investments demonstrated an adequate level of responsiveness to affordable housing needs within the MSA.

WFB's investment volume in the Montgomery MSA is excellent. During the evaluation period, WFB made 19 grants and investments in the MSA totaling \$11 million or 11.6 percent of allocated Tier 1 Capital. In addition, two prior period investments totaling \$116,000 remained outstanding as of year-end 2012. These prior period investments add support for the assigned rating. WFB's grants demonstrated an adequate level of responsiveness to community services needs within the MSA.

Highlights of WFB's grants and investments that benefited the Alabama AAs include the following:

- In October 2011, WFB invested \$15 million in a New Markets Tax Credit project in a moderate-income census tract of Birmingham, Alabama. The funds were used for expansion of a large regional hospital facility. The expansion will significantly revitalize and stabilize the area.
- In September 2012, WFB made a \$20,000 grant to a housing assistance program that provides foreclosure and/or eviction counseling and financial assistance to prevent families from becoming homeless. They also provide counseling to help families understand their finances and the importance of paying mortgage or rent on time to avoid foreclosure or evictions.

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

Performance under the Investment Test in the Mobile MSA and the Baldwin County Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Alabama. Performance under the Investment Test in Anniston-Oxford, Auburn-Opelika, Decatur, Dothan, Florence-Muscle Shoals, Gadsden, and Tuscaloosa MSAs and Cullman-Marshall, Dallas County, Eastern Central, Marion County, and Southeastern Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in Alabama. Performance in limited-scope areas did not influence the Investment Test performance in Alabama.

## **SERVICE TEST**

WFB's Service Test performance in Alabama is rated **High Satisfactory**. Based on full-scope reviews, performance in the Birmingham-Hoover, Huntsville, and Montgomery MSAs is excellent.

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

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Alabama full-scope AAs is excellent.

In the Birmingham-Hoover MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is below the

percentage of population residing in these geographies and is adequate. However, when giving consideration to seven middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves and is good in moderate-income geographies.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Huntsville MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low- income geographies exceeds the percentage of population residing in these geographies. The percentage distribution of branches in moderate-income geographies is near to the percentage of population residing in these geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Montgomery MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low-income geographies exceeds the percentage of population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of population residing in these geographies and is excellent. However, when considering two middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Alabama full-scope AAs did not affect branch distribution in a negative or positive way.

WFB's record of opening and closing branches in the Birmingham-Hoover MSA did not affect branch distribution in a negative or positive way. During the evaluation period, WFB opened one and closed two branches throughout the assessment area resulting in a net loss of one branch in middle-income geographies.

In the Huntsville and Montgomery MSAs, WFB did not open or close any branches during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of the full-scope AAs in Alabama, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Birmingham-Hoover MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 36 percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to 60 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Huntsville MSA, particularly low- and moderate-income geographies and individuals. Thirty-three percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to forty percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portion of the Montgomery MSA, particularly low- and moderate-income geographies and individuals. Twenty-five percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to thirty-eight percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Alabama full-scope AAs.

In the Birmingham-Hoover MSA, WFB is leader in providing CD services. WFB employees provided a total of 563 hours of CD services. These hours represented 158 different CD services that benefited 28 different organizations and amounted to more than five and a half hours of services per branch per year. Five services were considered highly responsive to identified community needs.

In the Huntsville MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 56 hours of CD services. These hours represented eleven different CD services that benefited five different organizations and amounted to slightly more than two and half hours of services per branch per year. Two services were considered highly responsive to identified community needs.

In the Montgomery MSA, WFB provides a limited level of CD services. WFB employees provided a total of 29 hours of CD services. These hours represented fourteen different CD services that benefited three different organizations and amounted to less than 1 hour of service per branch per year. No services were considered highly responsive to identified community needs.

Highlights of WFB's CD services that benefited Alabama include the following:

- A WFB employee serves as treasurer and provides financial expertise on lending to an affordable housing organization in the Birmingham-Hoover MSA.
- WFB employees provide financial literacy training to CD qualified organizations in the state of Alabama rating area.

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

Performance under the Service Test in the Tuscaloosa MSA and the Baldwin County non-metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Alabama. Performance under the Service Test in Dothan, Florence-Muscle Shoals, and Gadsden MSAs and Marion County and Southeastern non-metropolitan assessment areas is stronger than the bank's overall **High Satisfactory** performance in Alabama. Performance under the Service Test in Anniston-Oxford, Auburn-Opelika, Decatur, and Mobile MSAs and Dallas County, Cullman-Marshall, and Eastern Central non-metropolitan AAs is weaker than the bank's overall High Satisfactory performance in Alabama. Performance in limited-scope areas did not influence the Service Test performance in Alabama.

Refer to Tables 1 - 15 in the Alabama section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Alaska Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Alaska AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Alaska AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Alaska AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Alaska AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Alaska AAs.
- WFB's business hours do not vary in a way that inconveniences portions of its full-scope Alaska AAs.

## Description of Institution's Operations in the State of Alaska

Of the bank's 54 state and multistate rating areas, Alaska ranks 28<sup>th</sup> and accounts for 0.6 percent of total bank deposits, or \$5.3 billion as of June 30, 2012. WFB has three AAs in Alaska, which includes every borough in the state. Within the state, WFB operates 50 branches. WFB is the largest banking institution in Alaska with 52.3 percent of the deposit market share. Primary competitors include First National Bank of Alaska and Northrim Bank, with deposit market shares of 19.9 percent and 8.9 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Alaska

Of WFB's three AAs in Alaska, the Anchorage MSA and the Greater Alaska Non-Metropolitan AA were selected for full-scope reviews. These AAs accounts for 92 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Alaska is rated **Outstanding**. Based on full-scope reviews, performance is excellent in the Anchorage MSA and in the Greater Alaska Non-Metropolitan AA.

### Lending Activity

The level of lending activity in Alaska full-scope AAs is excellent.

The level of lending activity in Anchorage MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share percentage or ranking.

Lending activity in the Greater Alaska Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share percentage or ranking.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Alaska full-scope AAs is good.

In the Anchorage MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was good for home purchase and small loans to businesses, adequate for refinance loans and poor for home improvement loans and small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home refinance loans was considered good.

In the Greater Alaska Non-Metropolitan AA, the overall geographic distribution of loans is good. We initially concluded that the distribution was poor for home purchase, home improvement and refinance loans, adequate for small loans to businesses, and poor for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and refinance loans was good.

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

Distribution of loans by borrower income in Alaska is good.

In the Anchorage MSA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase, refinance and small loans to farms, and adequate for home improvement loans.

In the Greater Alaska Non-Metropolitan AA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase, and small loans to farms and adequate for home improvement and refinance loans.

### **CD Lending**

The volume and nature of the bank's CD lending had a significantly positive effect on lending performance in Alaska full-scope AAs.

WFB's CD loans had a significantly positive effect on lending performance in the Anchorage MSA. WFB originated \$115.2 million in CD loans equal to 35.7 percent of allocated Tier 1 Capital. Fifty-three percent of the loans were considered highly responsive to the need for affordable housing and neighborhood revitalization and had a significantly positive effect on our assessment of CD lending performance in the AA.

WFB's CD lending had a significantly positive effect on performance in the Greater Alaska Non-Metropolitan AA. WFB originated \$101 million in CD loans equal to 44.7 percent of allocated Tier 1 Capital. Twelve percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Greater Alaska Non-Metropolitan AA include the following:

- WFB provided over \$50 million in financing to Anchorage's largest nonprofit housing developer for the construction of 213 units of mixed-income, mixed-use, affordable housing in two economically challenged and diverse Anchorage neighborhoods.

- WFB provided a \$6 million annual operating line of credit and introduced an innovative method to provide Tribal Assistance for Native Families payments to low- and moderate-income individuals and families.
- WFB provided a \$35 million non-revolving construction loan for the development of a primary care health center located in the assessment area. The facility will provide employment opportunities to over 200 individuals.

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

Performance under the Lending Test in the Fairbanks MSA was not inconsistent with the bank's overall **Outstanding** performance in Alaska. Performance in the limited-scope assessment area did not influence the Lending Test performance in Alaska.

## **INVESTMENT TEST**

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

WFB's Investment Test performance in Alaska is rated **Outstanding**. Based on full-scope reviews, performance is excellent in the Anchorage MSA and good in the Greater Alaska Non-Metropolitan AA.

WFB's investment volume in the Anchorage MSA is excellent. During the evaluation period, WFB made 56 investments in the AA totaling \$63.1 million or 19.3 percent of allocated Tier 1 Capital. In addition, 13 prior period investments totaling \$4 million remained outstanding as of year-end 2012. These prior period investments add support for the assigned rating.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing and community services identified in the AA.

WFB's investment volume in the Greater Alaska Non-Metropolitan AA is adequate. During the evaluation period, WFB made 18 investments in the AA totaling \$4.2 million or 1.9 percent of allocated Tier 1 Capital. In addition, eight prior period investments totaling \$2.9 million remained outstanding as of year-end 2012. These prior period investments add support for the assigned rating.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited Alaska include the following:

- WFB invested \$17.5 million in a New Market Tax Credit project in the Anchorage MSA. The investment was used to provide financing for an approved community services organization that provides short-term shelter, food, clothing, health-care services, employment and education assistance to low- and moderate-income individuals in the assessment area.
- WFB invested \$13.2 million in an affordable housing project in the Anchorage MSA. The apartment complex is comprised of 59 units, of which 51 units will be rent-restricted and eight units will be available to seniors at market rate. Specifically, 39 of the 51 units will be restricted to households below 60 percent of the area median income and 12 units will be restricted to households below 50 percent of the area median income. This project qualifies for low-income housing tax credits.
- In January 2009, WFB invested \$3.1 million in the Carlanna Housing Project, a 24-unit affordable housing project located in Ketchikan, Alaska. Sponsored by the Tlingit-Haida Regional Housing Authority, these housing units are rent restricted and qualify for LIHTCs.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Fairbanks MSA was weaker than the bank's overall **Outstanding** performance in Alaska. Performance in limited-scope areas did not influence the Investment Test performance in Alaska.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in Alaska is rated **High Satisfactory**. Based on full-scope reviews, performance is good in the Anchorage MSA and in the Greater Alaska Non-Metropolitan AA.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

In the Anchorage AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

WFB has no branches in low-income tracts. However, because only two percent of the MSA population resides in these tracts we put more weight on branch distribution in moderate-income tracts. The percentage distribution of branches in moderate-income

geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Greater Alaska Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the AA.

WFB has no branches in low-income tracts. However, because only three percent of the AA population resides in these tracts we put more weight on branch distribution in moderate-income tracts. The percentage distribution of branches in moderate-income geographies is significantly below the percentage of the population residing in these geographies. However, geographies in the rural areas of Alaska tend to be very large with widely scattered populations. WFB's branches are located in centers of commerce that serve the widely dispersed population. Although the branch locations are generally middle- and upper-income areas, they are the most convenient for the widely scattered population of rural Alaska.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in Alaska full-scope AAs has generally not adversely affected the accessibility of delivery systems.

WFB's record of opening and closing branch offices in the Anchorage MSA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the assessment area resulting in a net loss of one branch in an upper-income geography.

There were no branch openings or closings in the Greater Alaska Non-Metropolitan AA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of Alaska full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Anchorage MSA, particularly low-and moderate-income geographies and individuals. Forty-four percent of branches located in moderate-income geographies maintained Saturday hours, compared to 89 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences portions of the Greater Alaska Non-Metropolitan AA, particularly low-and moderate-income geographies and individuals. Fifty percent of branches located in moderate-income geographies maintained Saturday hours, compared 32 percent of branches located in middle- and upper-income geographies.

## **CD Services**

WFB's Service Test performance in Alaska full-scope AAs is excellent.

In the Anchorage AA, WFB is a leader in providing CD services. WFB employees provided a total of 1,368 hours of CD services. These hours represented 250 CD service activities that benefited 22 different organizations and amounted to almost 18 hours of CD services per branch per year.

In the Greater Alaska Non-Metropolitan AA, WFB provides a relatively high level of CD services. WFB employees provided a total of 255 hours of CD services. These hours represented 34 CD service activities that benefited 10 different organizations and amounted to slightly more than two hours of CD service per branch per year. We considered the limited opportunities for CD services in the AA in our performance evaluation.

Highlights of WFB's CD services that benefited Alaska include the following:

- A WFB employee serves as a board member and provides financial expertise on revenue review including financials and monthly budgets for an affordable housing organization in the Anchorage, MSA.
- A WFB employee serves as a board member and provides financial expertise to a community mental health service provider in the Anchorage MSA.
- A WFB employee serves as the finance committee chairperson for a community services organization. In this capacity, the team member assists with fund raising activities, reviewing, planning and managing a budget for the organization and serves as the chairperson for the annual charity ball commission.

- A WFB employee volunteered financial expertise to find ways to bring more banking services and financial literacy to low-income and remote areas in the Greater AK-Non-Metro AA.
- A WFB employee serves on the Board as treasurer for a community services organization that provides direct health care related services to low- and moderate-income individuals in the Greater AK-Non-Metro AA.

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

Performance under the Service Test in the Fairbanks MSA was stronger than the bank's overall **High Satisfactory** performance in Alaska. Performance in limited-scope areas did not influence the Service Test performance in Alaska.

Refer to Tables 1 - 15 in the Alaska section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Arkansas Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>Low Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>Low Satisfactory</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect adequate responsiveness to the credit needs of its Arkansas AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its Arkansas AA.
- The distribution of WFB's borrowers reflect adequate penetration among borrowers of different income levels and businesses of different sizes within its Arkansas AA.
- WFB has an adequate level of qualified CD investments and grants within its Arkansas AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its Arkansas AA.

## Description of Institution's Operations in the State of Arkansas

Of the bank's 54 state and multistate rating areas, Arkansas ranks fifty-fourth and accounts for 0.0015 percent of total bank deposits, or \$12.6 million as of June 30, 2012. WFB has one defined AA in Arkansas, which consists of the entire county of Little River. Little River County is one of the 75 counties in the state. Within the AA, WFB operates one branch office. With a 0.02 percent market share of statewide deposits, WFB ranks 141 out of 143 banking institutions in the state of Arkansas. However, in Little River County, WFB is the third largest banking institution with 12.7 percent of deposits. Primary competitors include Regions Bank and First National Bank with deposit market shares of 43.6 percent and 33.2 percent, respectively.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Arkansas is rated **Low Satisfactory**. Based on a full-scope review, performance in the Ashdown Non-Metropolitan AA is adequate.

### Lending Activity

The level of lending activity in the Ashdown Non-Metropolitan AA is adequate and is supported by an excellent level of activity for home purchase and home refinance loans,

an adequate level of activity for home improvement loans, and a very poor level of activity for small loans to businesses and farms in relation to WFB's deposit rank or market share.

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

Geographic distribution of loans in Arkansas is adequate. In the Ashdown Non-Metropolitan AA, the overall geographic distribution of loans is adequate. There are no low- and moderate-income geographies. However, lending throughout the middle- and upper-income geographies reflected adequate penetration.

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

Distribution of loans by borrower income in Arkansas is adequate. In the Ashdown Non-Metropolitan AA, the overall distribution of loans by borrower income is adequate. The distribution is adequate for home purchase, home improvement, and home refinance loans, good for small loans to businesses, and excellent for small loans to farms.

### **CD Lending**

WFB originated no CD loans in the Ashdown Non-Metropolitan AA during the evaluation period.

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

There were no limited-scope AAs within the state of Arkansas rating area.

## **INVESTMENT TEST**

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

WFB's Investment Test performance in Arkansas is rated **Low Satisfactory**. WFB made no investments in the Ashdown Non-Metropolitan AA during the evaluation period.

WFB made one investments totaling \$500,000 that benefited the entire state during the evaluation period. The statewide investment is equal to 35 percent of allocated Tier 1 Capital allocated to the entire state. We considered the limited opportunities for investment in the Ashdown Non-Metropolitan AA and the effect of the statewide investment in our assessment of Investment Test performance in Arkansas.

WFB's statewide investment exhibited good responsiveness to the need for neighborhood revitalization and stabilization. Through an EQ2, WFB invested in a nonprofit CDFI based in Fayetteville, Arkansas. The funds were used to provide onsite technical assistance, training, and access to financing for small towns and rural communities with community water supply and wastewater disposal problems and, to a lesser extent, providing sustainable affordable housing for low-income and working families throughout 16 states in the Midwest and South. The organization's primary focus is on rural areas and on low-income populations.

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

There were no limited-scope AAs within the state of Arkansas rating area.

## **SERVICE TEST**

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

WFB's Service Test performance in Arkansas is rated **Low Satisfactory**. Based on a full-scope review, performance in the Ashdown Non-Metropolitan AA is adequate.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Arkansas adequate.

In the Ashdown Non-Metropolitan AA, WFB's distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of the AA. WFB has only one branch in the AA, which is located in a middle-income geography. The AA has no low-income or moderate-income geographies. The branch is centrally located within the AA.

#### ***Changes in Branch Location***

There were no branch openings or closings in Arkansas during the evaluation period.

#### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences portions of the Arkansas AA particularly low- and moderate-income individuals.

## **CD Services**

WFB provided a good level of CD services in Arkansas.

In the Ashdown Non-Metropolitan AA, WFB provides a relatively high level of CD services. WFB employees provided a total of seven hours of CD services. These hours represented one CD service activity and amounted to slightly more than two and a half hours of CD service per branch per year.

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

There were no limited-scope AAs within the state of Arkansas rating area.

Refer to Tables 1 - 15 in the Arkansas section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Connecticut Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>Low Satisfactory</b>
<b>The Service Test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Connecticut AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Connecticut AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Connecticut AAs.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an adequate level of qualified CD investments and grants within its full-scope Connecticut AAs.
- WFB's delivery systems are accessible to essentially all portions of its full-scope Connecticut AAs.

## Description of Institution's Operations in the State of Connecticut

Of the bank's 54 state and multistate rating areas, Connecticut ranks 22nd and accounts for 0.8 percent of total bank deposits, or \$7.35 billion as of June 30, 2012. WFB has four defined AAs in Connecticut, which include six out of eight counties and all MSAs in the state. Within the state, WFB operates 74 branch offices. WFB is the fourth largest banking institution in Connecticut with 7.2 percent of the deposit market share. Primary competitors include Bank of America, Webster Bank, and People's United Bank, with deposit market shares of 23.9 percent, 11.8 percent, and 10.7 percent, respectively.

Because WFB's branches in Connecticut have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Connecticut

Of WFB's four AAs in Connecticut, the Bridgeport-Stamford-Norwalk and New Haven-Milford, MSAs were selected for full-scope review. These AAs accounts for 86.9 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Connecticut is rated **High Satisfactory**. Based on full-scope reviews, performance in the Bridgeport-Stamford-Norwalk MSA is good and the New Haven-Milford, MSA is excellent.

### Lending Activity

The level of lending activity in Connecticut full-scope AAs is excellent.

The level of lending activity in the Bridgeport-Stamford-Norwalk MSA is excellent and is supported by an excellent level of activity for home purchase, home refinance, and home improvement loans and small loans to businesses and farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

The level of lending activity in the New Haven-Milford MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Connecticut full-scope AAs is good.

In the Bridgeport-Stamford-Norwalk MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was good for home improvement and small loans to businesses, excellent for home purchase and small loans to farms, and poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and credit demand

as indicated by HMDA applications, performance improved and distribution of refinance loans is considered adequate.

In the New Haven-Milford MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was adequate for refinance loans and small loans to businesses, excellent for small loans to farms, and good for home purchase and home improvement loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA and credit demand as indicated by HMDA applications, performance improved and distribution of home purchase loans was revised and is now considered excellent.

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

Distribution of loans by borrower income in Connecticut full-scope AAs is good.

In the Bridgeport-Stamford-Norwalk MSA, the overall distribution of loans by borrower income is good. The distribution is good for home improvement loans and small loans to businesses, excellent for home purchase loans and small loans to farms, and adequate for refinance loans.

In the New Haven-Milford MSA, the overall distribution of loans by borrower income is good. We initially concluded that the distribution was good for home purchase, home improvement, and small loans to businesses, excellent for small loans to farms, and adequate for refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is considered good.

### **CD Lending**

The volume and nature of the bank's CD lending had a neutral effect on performance in Connecticut full-scope AAs.

WFB's CD loans had a neutral effect on performance in the Bridgeport-Stamford-Norwalk MSA. WFB originated \$3.2 million in CD loans equal to 0.7 percent of allocated Tier 1 Capital.

WFB's CD loans had a neutral effect on performance in the New Haven-Milford MSA. WFB originated \$5.0 million in CD loans equal to 1.8 percent of allocated Tier 1 Capital. Forty percent of WFB's CD loans were considered particularly complex and/or

responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited Connecticut include the following:

- WFB renewed a line of credit used by a Community Loan Fund for their Affordable Housing Loan Pool. The funds were used to renovate a residential home that provides housing to low-income elderly individuals.

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

Performance under the Lending Test in the Hartford-West Hartford-East Hartford MSA and Litchfield County nonmetropolitan AA was not inconsistent with the bank's overall **High Satisfactory** performance in Connecticut. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Connecticut.

## **INVESTMENT TEST**

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

WFB's Investment Test performance in Connecticut is rated **Low Satisfactory**. Based on full-scope reviews, performance is adequate in the Bridgeport-Stamford-Norwalk MSA and good in the New Haven-Milford MSA.

WFB's grant and investment volume in the Bridgeport-Stamford-Norwalk MSA is adequate. During the evaluation period, WFB made 71 grants and investments in the MSA totaling \$17.3 million or 3.9 percent of allocated Tier 1 Capital.

WFB's grant and investment volume in the New Haven-Milford MSA is good. During the evaluation period, WFB made 43 grants and investments in the MSA totaling \$14.4 million or 5.2 percent of allocated Tier 1 Capital. WFB's grants and investments demonstrated an adequate level of responsiveness to the need identified in the AA for affordable housing.

Highlights of WFB's grants and investments that benefited Connecticut include the following:

- In April 2012, WFB invested \$250,000 through an EQ2 in an affordable housing organization in Bridgeport, Connecticut. The investment proceeds were used for acquisition, pre-development and rehab of residential real estate. The funds were initially used to improve the neighborhood by restoring abandoned buildings and

vacant lots to functional use and reducing blight, which will ultimately lead to a more vibrant community.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Hartford-West Hartford-East Hartford MSA was not inconsistent with the bank's overall **Low Satisfactory** performance in Connecticut. Performance under the Investment Test in the Litchfield County nonmetropolitan AA was weaker than the bank's overall **Low Satisfactory** performance in Connecticut. Performance in these limited-scope assessment areas did not influence the Investment Test performance in Connecticut.

## SERVICE TEST

WFB's Service Test performance in Connecticut is rated **High Satisfactory**. Based on full-scope reviews, performance in the Bridgeport-Stamford-Norwalk and New Haven-Milford MSAs is good.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Connecticut full-scope AAs is good.

In the Bridgeport-Stamford-Norwalk MSA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all geographies and individuals of different income levels.

The percentage distribution of branches in low- income geographies is significantly below the percentage of the population residing in these geographies and is poor. The percentage distribution of branches in moderate- income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the New Haven-Milford MSA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all geographies and individuals of different income levels.

The percentage distribution of branches in low- income geographies is significantly below the percentage of the population residing in these geographies and is poor. However, when considering one middle- and upper-income branch location that are in close proximity to low- income geographies, accessibility improves and is adequate. The percentage distribution of branches in moderate- income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when considering three middle- and upper-income branch locations that are in close proximity to moderate-income geographies, accessibility improves.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in Connecticut full-scope AAs did not affect branch distribution in a negative or positive way.

To the extent changes have been made, WFB's record of opening and closing branch offices in the Bridgeport-Stamford-Norwalk MSA did not affect branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the assessment area resulting in a net loss of one branch in a middle-income geography.

In the New Haven-Milford MSA, WFB did not open or close any branches during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are adequate and do not vary in a way that inconveniences portions of the Connecticut full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Bridgeport-Stamford-Norwalk MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 96 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the New Haven-Milford MSA, particularly low- and

moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 95 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided an adequate level of CD services in Connecticut full-scope AAs.

In the Bridgeport-Stamford-Norwalk MSA, WFB provides an adequate level of CD services. WFB employees provided a total of 191 hours of CD services. These hours represented 54 CD service activities that benefited 17 different organizations and amounted to slightly more than two hours of CD service per branch per year.

In the New Haven-Milford MSA, WFB is a leader in providing CD services. WFB employees provided a total of 200 hours of CD services. These hours represented 61 CD service activities that benefited 24 different organizations and amounted to slightly less than two and a half hours of CD service per branch per year.

Highlights of WFB's CD services that benefited Connecticut include the following:

- A WFB employee presents resources and information for first time homebuyers in the Bridgeport-Stamford-Norwalk MSA.
- A WFB employee provides financial expertise on lending to an affordable housing organization in the New Haven-Milford MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Hartford-West Hartford-East Hartford MSA is stronger than the bank's overall **High Satisfactory** performance in Connecticut. Performance under the Service Test in the Litchfield County AA is weaker than the bank's overall **High Satisfactory** performance in Connecticut. Performance in these limited-scope assessment areas did not influence the Service Test performance in Connecticut.

Refer to Tables 1 - 15 in the Connecticut section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Delaware Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>High Satisfactory</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending activities reflect excellent responsiveness to the credit needs of its full-scope Delaware AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Delaware AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Delaware AA.
- WFB has a good level of qualified CD investments and grants within its full-scope Delaware AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its full-scope Delaware AA.

## Description of Institution's Operations in the State of Delaware

Of the bank's 54 state and multistate rating areas, Delaware ranks 39th and accounts for 0.3 percent of total bank deposits, or \$2.08 billion as of June 30, 2012. WFB has three defined AAs in Delaware, which include all of the counties in the state. Within the state, WFB operates 21 branches. WFB is the 12th largest banking institution in Delaware with 0.6 percent of the deposit market share. Primary competitors include FIA Card Services, NA, and ING Bank, FSB with deposit market shares of 27.8 percent and 23.7 percent, respectively.

Because WFB's branches in Delaware have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of Delaware

Of WFB's three AAs in Delaware, the Wilmington MD was selected for full-scope review. The AA accounts for 82 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Delaware is rated **High Satisfactory**. Based on a full-scope review, performance in the Wilmington MD is good.

#### Lending Activity

The level of lending activity in the Delaware full-scope AA is excellent. The level of lending activity in the Wilmington MD is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and small farms.

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

Geographic distribution of loans in the Delaware full scope AA is adequate. We initially concluded that the distribution was adequate for home purchase loans and home improvement loans, poor for refinance loans, good for small loans to businesses and excellent for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications, performance improved and distribution of refinance loans is considered adequate.

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

Distribution of loans by borrower income in the Delaware full-scope AA is good. The distribution is excellent for home purchase loans, good for home improvement loans, refinance loans, good for small loans to businesses and excellent for small loans to farms.

#### CD Lending

WFB originated no CD loans in the Wilmington MD.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Dover MSA is not inconsistent with the bank's overall **High Satisfactory** performance in Delaware. Performance under the Lending Test in the Sussex County Non-Metropolitan AA is weaker than the bank's

overall **High Satisfactory** performance in Delaware. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Delaware.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Delaware is rated **High Satisfactory**. Based on a full-scope review, performance in the Wilmington MD is good. WFB's investment volume represents adequate responsiveness to the area's identified needs, particularly community services.

WFB's grant and investment volume in the Wilmington MD is excellent. During the evaluation period, WFB made 24 investments in the AA totaling \$10.5 million or 5.59 percent of allocated Tier 1 Capital. WFB had no prior period grants and investments.

WFB's investments represent excellent responsiveness to the need for community services identified in the MD.

Highlights of WFB's grants and investment that benefited the state of Delaware include the following:

- In December 2010, WFB invested \$10.3 million through a NMTC in an organization in Wilmington, Delaware for the expansion of an existing homeless shelter. The expansion wing was developed to accommodate women and families and offer 40 new transitional apartments for homeless families and individuals.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Dover MSA and the Sussex County Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Delaware. Performance in limited-scope areas did not influence the Investment Test performance in Delaware.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in Delaware is rated **Low Satisfactory**. Based on a full-scope review, performance in the Wilmington MD is adequate.

## **Retail Banking Services**

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Delaware full-scope AA is adequate.

In the Wilmington MD, WFB's distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of the institution's assessment area.

The percentage distribution of branches in low-income geographies is significantly below the percentage of the population residing in these geographies and is very poor. The percentage distribution of branches in mod-income geographies is well below the percentage of the population residing in these geographies and is poor.

However, when considering four branches in middle- and upper-income geographies that are in close proximity to low- and moderate-income geographies, accessibility improves in low-income geographies and is adequate.

### ***Changes in Branch Location***

There were no branch openings or closings in the Delaware assessment area during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours are poor and vary in a way that inconveniences certain portions of the Delaware full-scope AA particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours vary in a way that inconveniences certain portions of the assessment area of the Wilmington MD, particularly low- and moderate-income geographies and individuals. No stores located in moderate-income geographies maintained Saturday hours, compared to 47 percent of stores located in middle- and upper-income geographies.

## **CD Services**

WFB provided a poor level of CD services in the Delaware full-scope AA.

In the Wilmington MD, WFB provides a limited level of CD services. WFB employees provided a total of 45 hours of CD services. These hours represented 22 different CD service activities that benefited 10 different organizations, but amounted to slightly less than two and a half hours of CD service per branch per year.

Highlights of WFB's CD services that benefited the Delaware include the following:

- A WFB employee taught Teach Children to Save and Hands On Banking classes.

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

Performance under the Service Test in the Dover MSA is stronger than the bank's overall **Low Satisfactory** performance in Delaware. Performance under the Service Test in the Sussex County Non-Metropolitan AA is weaker than the bank's overall **Low Satisfactory** performance in Delaware. Performance in limited-scope areas did not influence the Service Test performance in Delaware.

Refer to Tables 1 - 15 in the Delaware section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Idaho Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Idaho AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Idaho AAs.
- The distribution of WFB's borrowers reflect good penetration borrowers of different income levels and businesses of different sizes within its full-scope Idaho AAs.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Idaho AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Idaho AAs.
- WFB is a leader in providing CD services within its full-scope Idaho AAs.

### Description of Institution's Operations in the State of Idaho

Of the bank's 54 state and multistate rating areas, Idaho ranks 29th and accounts for 0.5 percent of total bank deposits, or \$4.57 billion as of June 30, 2012. WFB has 10 defined AAs in Idaho, which include 38 out of 44 total counties in the state. Within the state, WFB operates 89 branches. WFB is the largest banking institution in Idaho with 23.6 percent of the deposit market share. Primary competitors include US Bank and Zions First National Bank, with deposit market shares of 16.2 percent and 6.7 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### Scope of Evaluation in the State of Idaho

Of WFB's 10 AAs in Idaho, the Boise City-Nampa MSA-Nampa MSA and the Central Idaho Non-Metropolitan AA were selected for full-scope review. These AAs accounts for 63.1 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Idaho is rated **Outstanding**. Based on full-scope reviews, performance in the Boise City-Nampa MSA and Central Idaho Non-Metropolitan AAs is excellent.

### Lending Activity

The level of lending activity in Idaho full-scope AAs is excellent. The level of lending activity in the Boise City-Nampa MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to businesses and farms and a good level of activity for home improvement loans in relation to WFB's deposit market share or rank. The level of lending activity in the Central Idaho Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to businesses and farms and a good level of activity for home improvement loans in relation to WFB's deposit market share or rank.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Idaho full-scope AAs is good.

In the Boise City-Nampa MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was adequate for home purchase loans and small loans to farms, excellent for small loans to businesses, and poor for home improvement and refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution is considered good for home purchase loans and adequate for refinance loans.

In the Central Idaho Non-Metropolitan AA, the overall geographic distribution of loans is excellent. The distribution is excellent for home purchase and refinance loans, small loans to businesses, and small loans to farms, and good for home improvement loans.

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

Distribution of loans by borrower income in Idaho full-scope AAs is good.

In the Boise City-Nampa MSA, the overall distribution of loans by borrower income is good. We initially concluded that distribution was good for home purchase and refinance loans, small loans to businesses, and small loans to farms, and excellent for home improvement loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA, performance improved and distribution of home purchase loans is considered excellent.

In the Central Idaho Non-Metropolitan AA, the overall distribution of loans by borrower income is adequate. The distribution is adequate for home purchase, refinance, and small loans to farms, good for small loans to businesses, and poor for home improvement loans.

## **CD Lending**

The volume and nature of the bank's CD lending had a positive effect on performance in Idaho full-scope AAs.

CD loans had a significantly positive effect on performance in the Boise City-Nampa MSA. WFB originated \$29.4 million in CD loans equal to 11.9 percent of allocated Tier 1 Capital. Thirty-six percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

CD loans had a neutral effect on performance in the Central Idaho Non-Metropolitan AA. WFB originated \$3.2 million in CD loans equal to 4.2 percent of allocated Tier 1 Capital. Fifty percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited Idaho include the following:

- In the Boise City-Nampa MSA, WFB provided a loan to fund the construction of a senior affordable housing development located in a moderate-income census tract.
- In the Central Idaho Non-Metropolitan AA, WFB provided a line of credit as a participation in a master line of credit for funding the acquisitions of rental apartment projects that qualify for federal LIHTCs.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Idaho Falls and Lewiston MSAs is not inconsistent with the bank's overall **Outstanding** performance in Idaho. Performance under the Lending Test in the Coeur d'Alene and Pocatello MSAs and the Bear Lake County, Panhandle Idaho, Rexburg-Driggs, and Western Idaho Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in Idaho. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Idaho.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Idaho is rated **Outstanding**. Based on full-scope reviews, performance in the Boise City-Nampa MSA and Central Idaho Non-Metropolitan AA is excellent.

WFB's grant and investment volume in the Boise City-Nampa MSA is excellent. During the evaluation period, WFB made 68 grants and investments in the MSA totaling \$11.9 million or 4.8 percent of allocated Tier 1 Capital. In addition, 13 prior period grants and investments totaling \$7.8 million or 3.1 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments exhibited adequate responsiveness to the need for affordable housing within the assessment area.

WFB's grant and investment volume in the Central Idaho Non-Metropolitan AA is excellent. During the evaluation period, WFB made 11 grants and investments in the MSA totaling \$1.6 million or 2.1 percent of allocated Tier 1 Capital. In addition, eight prior period grants and investments totaling \$3.4 million or 4.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments exhibited good responsiveness to the need for affordable housing within the assessment area.

Highlights of CD investments in Idaho include the following:

- In June 2010, WFB invested \$600,000 through an EQ2 in an affordable housing developer. WFB's investment was used for predevelopment costs on future affordable housing projects located in Idaho and Oregon.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Coeur d'Alene, Idaho Falls, and Pocatello MSAs and Western Idaho AAs is not inconsistent with the bank's overall **Outstanding** performance in Idaho. Performance under the Investment Test in the Lewiston MSAs and Panhandle Idaho, Bear Lake County, and Rexburg-Driggs Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in Idaho. Performance in these limited-scope assessment areas did not influence the Investment Test performance in Idaho.

## SERVICE TEST

WFB's Service Test performance in Idaho is rated Outstanding. Based on full-scope reviews, performance in the Boise City and Central ID MSAs is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

### *Retail Banking Services*

WFB's distribution of branches in Idaho full-scope AAs is excellent.

In the Boise City MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all geographies and individuals of different income levels.

The percentage distribution of branches in low- income geographies is significantly below the percentage of the population residing in these geographies and is very poor. The percentage distribution of branches in moderate- income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Central ID MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all geographies and individuals of different income levels.

The percentage distribution of branches in low- income geographies is significantly below the percentage of the population residing in these geographies and is very poor. The percentage distribution of branches in moderate- income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in Idaho full-scope AAs has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate- income geographies and/or to low- and moderate-income individuals.

WFB's record of opening and closing branch offices in the Boise City MSA is good. WFB has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate- income geographies and/or to low- and moderate-income individuals. During the evaluation period, WFB closed two branches throughout the assessment area resulting in a net loss of two branches in moderate-income geographies. However, distribution in moderate-income geographies continued to be excellent.

To the extent changes have been made, WFB's record of opening and closing branch offices in the Central ID MSA did not affect branch distribution in a negative or positive way. During the evaluation period, WFB closed two branches throughout the assessment area resulting in a net loss of one branch in a middle-income geography and one branch in an upper-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of Idaho full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Boise City MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 64 percent of branches located in those geographies maintained Saturday hours, compared to 93 percent of branches located in non-low- and moderate-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Central ID MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 67 percent of branches located in those geographies maintained Saturday hours, compared to 39 percent of branches located in non-low- and moderate-income geographies.

## CD Services

WFB provided an excellent level of CD services in Idaho.

In the Boise City MSA, WFB is a leader in providing CD Services. WFB employees provided a total of 466 hours of CD Services. These hours represented 167 different CD services that benefited 23 different organizations and amounted to more than four hours of CD service per branch per year. 50 services were considered highly responsive to identified community needs.

In the Central ID MSA, WFB provides an adequate level of CD Services. WFB employees provided a total of 64 hours of CD Services. These hours represented nine different CD services that benefited four different organizations and amounted to less than one hour of CD service per branch per year. Six services were considered highly responsive to identified community needs. We considered the limited opportunities for CD services in our conclusions for the Central ID MSA.

Highlights of WFB's CD services that benefited Idaho include the following:

- A WFB employee provides financial expertise to an affordable housing organization in the Boise City MSA.
- A WFB employee provides financial expertise to an organization that provides support services for low- and moderate-income individuals in the Central ID MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the service test in the Coeur d'Alene, Idaho Falls, Lewiston, Panhandle ID, and Pocatello MSAs is not inconsistent with the bank's overall **Outstanding** performance in Idaho. Performance under the service test in the Rexburg-Driggs, Bear Lake County, and Western ID MSAs is weaker than the bank's overall **Outstanding** performance in Idaho. Performance in these limited-scope assessment areas did not influence the service test performance in Idaho.

Refer to Tables 1 - 15 in the Idaho section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Illinois Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>Outstanding</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Needs To Improve</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Illinois AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Illinois AA.
- The distribution of WFB's borrowers reflects good penetration among retail customers of different income levels and business customers of different sizes within its full-scope Illinois AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified community development investment and grants within its full-scope Illinois AA.
- WFB's delivery systems are accessible to limited portions of its full-scope Illinois AA.

## Description of Institution's Operations in the State of Illinois

Of the bank's 54 state and multistate rating areas, Illinois ranks twenty-seventh and accounts for 0.7 percent of total bank deposits, or \$ 5.5 billion as of June 30, 2012. WFB has three defined AAs in Illinois, which include 15 out of the 102 counties in the state. Within the state, WFB operates 16 branch offices. WFB is the twelfth largest banking institution in Illinois with 1.5 percent of the deposit market share. Primary competitors include JP Morgan Chase Bank, NA and BMO Harris Bank, NA with deposit market shares of 17.9 percent and 9.1 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

CD lending and investment opportunities statewide in Illinois were constrained by the downturn in the economy. The nonprofit organizations that are the developers on most CD projects throughout the state suffered significant financial hardship when anticipated revenue from federal, state, and local entities was cut back as a result of falling tax revenues. Without the money to cover basic expenses and predevelopment costs, these organizations were unable to create viable lending and investment opportunities at prerecession levels. Although most states were faced with budget shortfalls, the situation was particularly severe in Illinois.

## Scope of Evaluation in the State of Illinois

Of WFB's three AAs in Illinois, the Chicago-Joliet-Naperville MD was selected for full-scope review. This AA accounts for 83 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Illinois is rated **Outstanding**. Based on full-scope review, performance in the Chicago-Joliet-Naperville MD is excellent

### Lending Activity

The level of lending activity in the Illinois full-scope AA is excellent. The level of lending activity in Chicago-Joliet-Naperville MD is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Illinois full-scope AA is good.

In the Chicago-Joliet-Naperville MD, the overall geographic distribution of loans is good. We initially concluded that the distribution was good for home purchase loans, adequate for home improvement loans and small loans to businesses, poor for home refinance loans and very poor for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA and credit demand as indicated by HMDA applications, performance improved and distribution is considered excellent for home purchase loans and adequate for home refinance loans.

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

Distribution of loans by borrower income in the Illinois full-scope AA is good.

In the Chicago-Joliet-Naperville MD, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home

purchase loans and small loans to farms, and adequate for home improvement and home refinance loans.

## CD Lending

The volume and nature of the bank's CD Lending had a significantly positive effect on performance in the Illinois full-scope AA.

WFB's \$35.8 million in community development loans had a positive effect on performance in the Chicago-Joliet-Naperville MD. However, when we considered the performance context factors limiting opportunities for CD lending, we determined the level of CD lending was sufficient to have a significantly positive effect on lending performance overall.

Highlights of WFB's CD Lending that benefited the state of Illinois include the following:

- In December 2011, WFB provided a \$9.3 million loan for the purpose of funding the acquisition and renovation of a 132-unit LIHTC affordable housing complex located in Yorkville, Illinois. The borrower is collaborating with the ninth largest affordable housing developer to acquire and renovate an existing 132-unit LIHTC affordable housing complex in Yorkville, Illinois. Ninety percent of the units are restricted to low- and moderate-income residents.
- In August 2011, WFB refinanced a \$12.2 million loan that was originated for the purpose of funding the acquisition of a 200-unit affordable housing complex located in Oak Park, Illinois. The property, consisting of 186 one-bedroom units and 14 two-bedroom units, is restricted to residents that are 62 or older and low- and moderate-income.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Galesburg-Canton Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Illinois. Performance under the Lending Test in the Sterling Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Illinois. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Illinois.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Illinois is rated **Outstanding**. Based on a full-scope review, performance in the Chicago-Joliet-Naperville MD is excellent.

WFB's grant and investment volume in the Chicago-Joliet-Naperville MD is excellent. During the evaluation period, WFB made 57 grants and investments in the AA totaling \$54.5 million or 10.5 percent of allocated Tier 1 Capital. In addition, six prior period investments totaling \$2.9 million or 0.6 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the need identified in the AA for affordable housing.

Highlights of WFB's grants and investments that benefited the Illinois include the following:

- In July 2011, WFB invested \$36.7 million in Parkway Gardens, a 694-unit affordable housing apartment property in the Southside of Chicago, Illinois. The development will be preserved as affordable housing for an additional 30 years, utilizing both low-income housing tax credits and Section 8 vouchers.
- In April 2009, WFB invested \$1.5 million in the Neighborhood Housing Services of Chicago (NHS). WFB's investment was used to help fund a lending program called the Homeownership Retention and Neighborhood Preservation Loan Pool. This program provides credit to disinvested communities to help prevent foreclosure. The program originates loans to help homeowners retain their homes, provide rehab and energy efficiency, and increase short-term disposable household income that is being depleted by sub-prime mortgage lending and the economic recession.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Sterling Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Illinois. Performance under the Investment Test in Galesburg-Canton, IL Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Illinois. Performance in limited-scope areas did not influence the Investment Test performance in Illinois.

## SERVICE TEST

WFB's Service Test performance in Illinois is rated **Needs to Improve**. Based on a full-scope review, performance in the Chicago-Joliet-Naperville MD is poor.

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

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Illinois full-scope AA is very poor.

In the Chicago-Joliet-Naperville MD, WFB's distribution of branches is very poor. Delivery systems are accessible to limited portions of WFB's AAs. There are no branches in low- and moderate-income geographies.

##### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in the Illinois full-scope AA did not affect the branch distribution in a negative or positive way.

WFB's record of opening and closing branch offices in the Chicago-Joliet-Naperville MD, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB opened two branches throughout the assessment area resulting in a net gain of two branches in upper-income geographies.

##### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services vary in a way that significantly inconveniences many portions of the Illinois full-scope AA, particularly low- and moderate-income geographies and individuals.

#### **CD Services**

WFB provided an excellent level of CD services in the Illinois full-scope AA.

In the Chicago-Joliet-Naperville MD, WFB is a leader in providing CD services. WFB employees provided a total of 296 hours of CD Services. These hours represented 69 different CD services that benefited 19 different organizations and amounted to almost eight hours of CD service activities per branch per year. Twenty-two percent of the services were considered highly responsive to identified community needs.

Highlights of WFB's CD Services that benefited the Illinois include the following:

- A WFB employee is an active member of the board of directors of a non-profit organization with a mission to assist the financial services industry to identify, develop, and implement innovative ways to serve the underbanked market that are profitable for both company and customer.

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

Performance under the Service Test in Galesburg-Canton Non-Metropolitan AA is stronger than the bank's overall **Needs to Improve** performance in Illinois.

Performance under the Service Test in Sterling Non-Metropolitan AA is weaker than the bank's overall **Needs to Improve** performance in Illinois. Performance in limited-scope areas did not influence the Service Test performance in Illinois.

Refer to Tables 1 - 15 in the Illinois section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Indiana Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Indiana AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Indiana AAs.
- The distribution of WFB's borrowers reflects excellent penetration among retail customers of different income levels and businesses of different sizes within its full-scope Indiana AAs.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Indiana AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Indiana AAs.
- WFB's branch hours do not vary in a way that inconveniences portions of its full-scope Indiana AAs.

### Description of Institution's Operations in the State of Indiana

Of the bank's 54 state and multistate rating areas, Indiana ranks 33<sup>rd</sup> and accounts for 0.4 percent of total bank deposits, or \$ 3.03 billion as of June 30, 2012. WFB has ten defined AAs in Indiana, which includes 26 out of 92 total counties in the state. Within the state, WFB operates 38 branches. WFB is the eighth largest banking institution in Indiana with 3.0 percent of the deposit market share. Primary competitors include JPMorgan Chase Bank, National Association and PNC Bank, National Association, with deposit market shares of 13.35 percent and 9.5 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### Scope of Evaluation in the State of Indiana

Of WFB's 10 AAs in Indiana, the Fort Wayne MSA and Northeastern Indiana Non-Metropolitan AA were selected for full-scope review. These AAs accounts for 58.4 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Indiana is rated **High Satisfactory**. Based on full-scope reviews, performance is good in the Fort Wayne MSA and Northeastern Indiana Non-Metropolitan AA.

### Lending Activity

The level of lending activity in Indiana full-scope AAs is excellent. The level of lending activity in the Fort Wayne MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to businesses, a good level of activity for small loans to farms, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share percentage or rank.

The level of lending activity in the Northeastern Indiana Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase and refinance loans and small loans to businesses and farms and an adequate level of activity for home improvement loans in relation to WFB's deposit market share percent or rank.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Indiana full-scope AAs is good.

In the Fort Wayne MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was adequate for home purchase loans, excellent for small loans to businesses, good for home improvement loans, poor for refinance loans, and very poor for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and credit demand as indicated by HMDA applications, performance improved and distribution of home refinance loans is considered good.

In the Northeastern Indiana Non-Metropolitan AA, the overall geographic distribution of loans is good. The distribution is good for refinance loans, excellent for home purchase, home improvement, and small loans to businesses, and adequate for small loans to farms.

## Distribution of Loans by Income Level of the Borrower

Distribution of loans by borrower income in Indiana full-scope AAs is excellent.

In the Fort Wayne MSA, the overall distribution of loans by borrower income is excellent. The distribution is good for home improvement and refinance loans, excellent for home purchase and small loans to businesses, and poor for small loans to farms.

In the Northeastern Indiana Non-Metropolitan AA, the overall distribution of loans by borrower income is good. The distribution is good for refinance loans, excellent for home purchase, home improvement, and small loans to businesses, and adequate for small loans to farms.

## CD Lending

The volume and nature of the bank's CD lending had a neutral effect on performance in Indiana full-scope AAs.

WFB's CD loans had a neutral effect on performance in the Fort Wayne MSA. WFB originated \$2.3 million in CD loans equal to 1.3 percent of allocated Tier 1 Capital. Fifty-two percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited Indiana include the following:

- WFB renewed a line of credit that provided working capital to a community service organization, which focuses on assisting people experiencing developmental or economic challenges in the Fort Wayne MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Michigan City-La Porte and South Bend-Mishawaka MSAs and Decatur and Rush County Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Indiana.

Performance under the Lending Test in North Central Indiana Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in Indiana.

Performance under the Lending Test in Elkhart-Goshen and Indianapolis-Carmel MSAs, and White County Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Indiana. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Indiana.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Indiana is rated **Outstanding**. Based on full-scope reviews, performance in the Fort Wayne MSA is excellent and the Northeastern Indiana Non-Metropolitan AA is adequate.

WFB's grant and investment volume in the Fort Wayne MSA is excellent. During the evaluation period, WFB made 28 grants and investments in the AA totaling \$4.6 million or 2.6 percent of allocated Tier 1 Capital. In addition, seven prior period grants and investments totaling \$9.8 million or 5.7 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments were responsive to the identified need for affordable housing within the assessment area.

WFB's grant and investment volume in the Northeastern Indiana Non-Metropolitan AA is adequate. During the evaluation period, WFB made nine grants and investments in the AA totaling \$411,000 or 1.7 percent of allocated Tier 1 Capital. In addition, one prior period investment totaling \$392,000 or 1.7 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments were responsive to the need for affordable housing within the assessment area.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the North Central Indiana Non-Metropolitan AA was not inconsistent with the bank's overall **Outstanding** performance in Indiana. Performance under the Investment Test in the North Central Non-Metropolitan Assessment Area was stronger than the bank's overall **Outstanding** performance in Indiana. Performance under the Investment Test in the Elkhart-Goshen, Indianapolis-Carmel, South Bend-Mishawaka and Michigan City-La Porte MSAs and Decatur, Rush County, and White County Non-Metropolitan AAs was weaker than the bank's overall **Outstanding** performance in Indiana. Performance in limited-scope areas did not influence the Investment Test performance in Indiana.

## SERVICE TEST

WFB's Service Test performance in Indiana is rated **High Satisfactory**. Based on full-scope reviews, performance in the Fort Wayne MSA is good and the Northeastern Indiana Non-Metropolitan AA is adequate.

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

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Indiana full-scope AAs is excellent.

In the Fort Wayne MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the bank's assessment area.

The percentage distribution of branches in low-income geographies is near to the percentage of the population residing in these geographies and is good. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Northeastern Indiana Non-Metropolitan AA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all portions of the bank's assessment area. There were no low- or moderate-income census tracts in the assessment area therefore our evaluation focused on distribution throughout the AA.

#### ***Changes in Branch Location***

There were no branch openings or closings in Fort Wayne MSA or Northeastern Indiana Non-Metropolitan AA during the evaluation period.

#### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of Indiana full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Fort Wayne MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 63 percent of branches located in those geographies maintained Saturday hours, compared to 100 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Northeastern Indiana Non-Metropolitan AA particularly

low- and moderate-income individuals. There are no low- or moderate-income geographies in the AA.

## CD Services

WFB provided an excellent level of CD services in Indiana full-scope AAs.

In the Fort Wayne MSA, WFB is a leader in providing CD services. WFB employees provided a total of 333 hours of CD services. These hours represented 74 different CD service activities that benefited 16 different organizations and amounted to almost five hours of CD service per branch per year.

In the Northeastern Indiana Non-Metropolitan AA, WFB provides few if any CD services. WFB employees provided a total of four hours of CD services. These hours represented two different CD service activities that benefited one organization and amounted to less than a half hour of CD service per branch per year.

Highlights of WFB's CD services that benefited Indiana full-scope AAs include the following:

- A WFB employee facilitated a quarterly class focusing on credit review and organization for an affordable housing group within the Fort Wayne MSA.
- A WFB employee participated in the board meetings of an affordable housing organization with the Northeastern Indiana Non-Metropolitan AA, by reviewing the financial statements of the organization.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the South Bend-Mishawaka MSA and North Central and Rush County Non-Metropolitan Assessment Areas is stronger than the bank's overall **High Satisfactory** performance in Indiana. Performance under the Service Test in the Elkhart-Goshen, Indianapolis-Carmel, and Michigan City-La Porte MSAs and Decatur and Whit County Non-Metropolitan Assessment Areas is weaker than the bank's overall **High Satisfactory** performance in Indiana. Performance in limited-scope areas did not influence the Service Test performance in Indiana.

Refer to Tables 1 - 15 in the Indiana section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Iowa Rating

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

The major factors that support this rating include:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Iowa AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Iowa AAs.
- The borrower distribution of WFB's loans reflect good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Iowa AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants in its full-scope Iowa AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Iowa AAs.
- WFB's branch hours do not vary in a way that inconveniences portions of its full-scope Iowa AAs.

## Description of Institution's Operations in the State of Iowa

Of the bank's 54 state and multistate rating areas, Iowa ranks 26<sup>th</sup> and accounts for 0.7 percent of total bank deposits, or \$ 5.57 million as of June 30, 2012. WFB has 15 defined AAs in Iowa, which include 28 out of 99 total counties in the state. Within the state, WFB operates 63 branches. WFB is the largest banking institution in Iowa with 8.8 percent of the deposit market share. Primary competitors include US Bank and Bank of America, with deposit market shares of 6.8 percent and 3.6 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Iowa

Of WFB's 15 AAs in Iowa, the Cedar Rapids and Des Moines-West Des Moines MSAs were selected for full-scope review. These AAs accounts for 58.5 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Iowa is rated **Outstanding**. Based on full-scope reviews, performance in the Cedar Rapids and Des Moines-West Des Moines MSAs is excellent.

### Lending Activity

The level of lending activity in Iowa full-scope AAs is excellent. The level of lending activity in the Cedar Rapids MSA is excellent and is supported by an excellent level of activity for home purchase, refinance, small loans to farms and small loans to businesses, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share.

The level of lending activity in the Des Moines-West Des Moines MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share percentage or ranking.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Iowa full-scope AAs is good.

In the Cedar Rapids MSA, the overall geographic distribution of loans is adequate. We initially concluded that the distribution was good for home purchase loans, adequate for home improvement and small loans to businesses, poor for refinance loans, and very poor for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications in the AA, performance improved and distribution of refinance loans is considered adequate.

In the Des Moines-West Des Moines MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was good for small loans to businesses, adequate for home purchase loans, and poor for home improvement and home refinance loans and for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications in the AA, performance

improved and distribution of home purchase and home refinance loans is considered good and adequate respectively.

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

Distribution of loans by borrower income in Iowa full-scope AAs is good.

In the Cedar Rapids MSA, the overall distribution of loans by borrower income is good. The distribution is good for refinance loans and excellent for home purchase, home improvement, and small loans to businesses, and adequate for small loans to farms.

In the Des Moines-West Des Moines MSA, the overall distribution of loans by borrower income is good. We initially concluded that the distribution was excellent for home purchase and home improvement loans and small loans to businesses and adequate for home refinance loans and small loans to farms.

However, when we assessed lending to low- and/or moderate-income borrowers relative to WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is considered good.

## **CD Lending**

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Iowa full-scope AAs.

WFB's CD loans had a significantly positive effect on performance in the Cedar Rapids MSA. WFB originated \$10.0 million in CD loans equal to 14 percent of allocated Tier 1 Capital.

WFB's CD loans had a significantly positive effect on performance in the Des Moines-West Des Moines MSA. WFB originated \$30.4 million in CD loans equal to 10 percent of allocated Tier 1 Capital. Sixty-one percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Iowa AA include the following:

- WFB provided a \$3.7 million dollar construction to an affordable housing organization for the purpose of acquiring and rehabilitating two projects consisting of 60 LIHTC family units in the Des Moines-West Des Moines MSA.
- The bank provided a \$150 million dollar line of credit to a Tax Credit Investment Fund, which was allocated to a 150-unit affordable housing project located in a low-income area of the Des Moines-West Des Moines MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Waterloo-Cedar Falls MSA and Crawford County, Fort Dodge, Marion County, and Ottumwa Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Iowa. Performance under the Lending Test in Ames, Iowa City, and Sioux City MSAs and Cass County, Marshalltown, Mason City, Palo Alto County, and Poweshiek County Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Iowa. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Iowa.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Iowa is rated **Outstanding**. Based on full-scope reviews, performance in the Cedar Rapids and Des Moines-West Des Moines MSAs is excellent

WFB's grant and investment volume in the Cedar Rapids MSA is excellent. During the evaluation period, WFB made 10 grants and investments in the AA totaling \$7.5 million or 10.7 percent of allocated Tier 1 Capital. In addition, three prior period grants and investments totaling \$0.8 million or 1.2 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the need identified in the AA for affordable housing.

WFB's grant and investment volume in the Des Moines-West Des Moines MSA is excellent. During the evaluation period, WFB made 85 grants and investments in the AA totaling \$44.2 million or 14.9 percent of allocated Tier 1 Capital. In addition, 11 prior period grants and investments totaling \$9.3 million or 3.1 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments were responsive to affordable housing and community services needs within the MSA.

Highlights of WFB's grants and investments that benefited the Iowa include the following:

- WFB provided a grant to a local affordable housing organization that is dedicated to providing affordable housing in the Cedar Rapids area.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Ames, Iowa City, Sioux City, and Waterloo-Cedar Falls MSAs is not inconsistent with the bank's overall **Outstanding** performance in Iowa. Performance under the Investment Test in Cass County, Crawford County, Fort Dodge, Marion County, Marshalltown, Mason City, Ottumwa, Palo Alto County, and Poweshiek County Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Iowa. Performance in limited-scope areas did not influence the Investment Test performance in Iowa.

## SERVICE TEST

WFB's Service Test performance in Iowa is rated **High Satisfactory**. Based on full-scope reviews, performance in the Cedar Rapids and Des Moines-West Des Moines MSAs are good.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

WFB's distribution of branches in Iowa full-scope AAs is excellent.

### *Accessibility of Delivery Systems*

In the Cedar Rapids MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of WFB's assessment area.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is good. However, when considering one middle-income branch that is in close proximity to low- and moderate-income geographies, accessibility improves.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Des Moines-West Des Moines MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the bank's assessment area.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is excellent. However, when considering one middle-income branch that is in close proximity to low- and moderate-income geographies, accessibility improves.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Iowa full-scope AAs did not affect branch distribution in a negative or positive way.

WFB's record of opening and closing branches in the Cedar Rapids MSA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB opened one and closed one branch in a moderate-income geography resulting in no change in the branch distribution in moderate-income geographies.

WFB's record of opening and closing branches in the Des Moines-West Des Moines MSA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed three branches resulting in a net loss of three branches in middle-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of Iowa full-scope AAs particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours do not vary in a way that inconveniences portions of the Cedar Rapids MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 33 percent of branches located in those geographies maintained Saturday hours, compared to 67 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours do not vary in a way that inconveniences portions of the Des Moines-West Des Moines MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 67 percent of branches located in those geographies maintained Saturday hours, compared to 79 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided an excellent level of CD services in Iowa full-scope AAs.

In the Cedar Rapids MSA, WFB provides a limited level of CD services. WFB employees provided a total of 66 hours of CD services. These hours represented 35 different CD service activities that benefited five different organizations, but amounted to slightly more than one hour of CD service per branch per year.

In the Des Moines-West Des Moines MSA, WFB is a leader in providing CD services. WFB employees provided a total of 1,284 hours of CD services. These hours represented 213 CD service activities that benefited 47 different organizations and amounted to more than 15 hours of service per branch per year.

Highlights of WFB's CD services that benefited Iowa include the following:

- A WFB employee serves as a board member and provides financial expertise to community services organization in the Cedar Rapids MSA.
- A number of WFB employees provide free income tax return preparation services through a community services organization in the Des Moines-West Des Moines MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in Crawford, Mason City, and Palo Alto Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in Iowa. Performance under the Service Test in Sioux City MSA and Cass County, Marion County, and Poweshiek County Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in Iowa. Performance under the Service Test in Ames and Waterloo-Cedar Falls MSAs and Fort Dodge, Marshalltown, and Ottumwa County Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Iowa. Performance in limited-scope areas did not influence the Service Test performance in Iowa.

Refer to Tables 1 - 15 in the Iowa section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Kansas Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Kansas AA.
- The geographic distribution of WFB's loans reflects poor penetration throughout its full-scope Kansas AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Kansas AA.
- WFB has an excellent level of CD investments and grant and investments within its full-scope Kansas AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope Kansas AA.
- WFB provided an adequate level of CD services in its full-scope Kansas AA.

### Description of Institution's Operations in the State of Kansas

Of the bank's 54 state and multistate rating areas, Kansas ranks 44th and accounts for 0.1 percent of total bank deposits, or \$968 million as of June 30, 2012. WFB has three defined AAs in Kansas, which include 11 of the 105 counties in the state. Within the state, WFB operates nine branches. WFB is the ninth largest banking institution in Kansas with 1.4 percent of the deposit market share. Primary competitors include Capital Federal Savings Bank, and Bank of America, NA with deposit market shares of 7.8 percent and 7.8 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### Scope of Evaluation in the State of Kansas

Of WFB's three AAs in Kansas, the Kansas City MSA was selected for full-scope review. This AA accounts for 59 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

WFB's Lending Test performance in Kansas is rated **High Satisfactory**. Based on a full-scope review, performance in the Kansas City MSA is good.

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

The level of lending activity in the Kansas full-scope AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home improvement loans and a good level of activity for small loans to businesses and farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the number of farm lenders in the AA.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Kansas full-scope AA is poor. We initially concluded that the distribution was excellent for small loans to farms, adequate for small loans to businesses, poor for home purchase loans, and very poor for home improvement and home refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase loans is considered good.

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

Distribution of loans by borrower income in the Kansas full-scope AA is good. We initially concluded that the distribution was excellent for home purchase loans and small loans to businesses and farms, good for home improvement loans, and adequate for home refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is considered good.

### CD Lending

WFB made no CD loans in Kansas during the evaluation period. The volume and nature of the bank's CD lending had a neutral effect on performance in Kansas.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Wichita MSA is not inconsistent with the bank's overall **High Satisfactory** performance in Kansas. Performance under the Lending Test in the Atchison County Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Kansas. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Kansas.

## INVESTMENT TEST

WFB's Investment Test performance in Kansas is rated **Outstanding**. Based on a full-scope review, performance in the Kansas City MSA is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

WFB's grant and investment volume in the Kansas City MSA is excellent. During the evaluation period, WFB made 11 grants and investments in the AA totaling \$7.9 million or 12.8 percent of allocated Tier 1 Capital.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited the Kansas include the following:

- As part of WFB's 2010 Priority Markets Initiative, \$150,000 was donated to a non-profit organization for investment and renovation in five urban core neighborhoods. These investments have attracted hundreds of new homeowners and residents to formerly declining neighborhoods and attracted new services and jobs to under-served urban communities. This effort has served as a catalyst for other investors and developers to initiate projects in our community.
- In November 2010, WFB invested \$7.2 million in Pemberton Place, an 80-unit affordable housing project located in Kansas City, Kansas. Of the total, 76 units are rent restricted to low- and moderate-income households. This project was part of a \$25 million investment in a national LIHTC fund.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Wichita MSA is not inconsistent with the bank's overall **Outstanding** performance in Kansas. Performance under the

Investment Test in Atchison County Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Kansas. Performance in limited-scope areas did not influence the Investment Test performance in Kansas.

## **SERVICE TEST**

WFB's Service Test performance in Kansas is rated **High Satisfactory**. Based on a full-scope review, performance in the Kansas City MSA is good.

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

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Kansas full-scope AA is excellent.

In the Kansas City MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

WFB has no branches in low-income geographies. However, because less than five percent of the MSA population lives in these geographies we placed more weight on performance in the moderate-income geographies. The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good.

However, when giving consideration to two branches in middle- and upper-income locations that are in close proximity to moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

##### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Kansas full-scope AA did not affect the branch distribution in a negative or positive way.

WFB's record of opening and closing branches in the Kansas City MSA, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB

opened one branch throughout the assessment area resulting in a net gain of one branch in an upper-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences certain portions of the Kansas full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Kansas City MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 80 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an adequate level of CD services in the Kansas full-scope AA.

In the Kansas City MSA, WFB provided an adequate level of CD services. WFB employees provided a total of 36 hours of CD services. These hours represented 15 CD service activities that benefited five different organizations and amounted to slightly more than two hours of CD services per branch per year.

Highlights of WFB's CD services that benefited the Kansas include the following:

- WFB employees provided Hands on Banking training clients of various affordable housing organizations in the MSA.

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

Performance under the Service Test in Atchison County Non-Metropolitan AA was not inconsistent with the bank's overall **High Satisfactory** performance in Kansas. Performance under the Service Test in Wichita MSA was weaker than the bank's overall **High Satisfactory** performance in Kansas. Performance in limited-scope areas did not influence the Service Test performance in Kansas.

Refer to Tables 1 - 15 in the Kansas section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Maryland Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Maryland AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Maryland AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes.
- CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Maryland AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope Maryland AA.
- WFB's business hours do not vary in a way that inconveniences certain portions of its full-scope Maryland AA.

### Description of Institution's Operations in the State of Maryland

Of the bank's 54 state and multistate rating areas, Maryland ranks 20<sup>th</sup> and accounts for 1.0 percent of total bank deposits, or \$8.5 billion as of June 30, 2012. WFB has two AAs in Maryland, which includes nine out of 24 counties in the state. Within the state, WFB operates 56 branch offices. WFB is the fifth largest banking institution in Maryland with 7.8 percent of the deposit market share. Primary competitors include Bank of America, N.A., and Manufactures and Traders Trust Company, with deposit market shares of 19.6 percent and 16.0 percent, respectively.

Because WFB's branches in the Maryland have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Maryland

Of WFB's two AAs in Maryland, the Baltimore-Towson MSA was selected for full-scope review. This AA accounts for 68.9 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in the Maryland full-scope AA is rated **Outstanding**. Based on a full-scope review, performance in the Baltimore-Towson MSA is good.

### Lending Activity

The level of lending activity in Baltimore-Towson MSA is excellent and is supported by an excellent level of lending activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share percentage and ranking. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Baltimore-Towson MSA is adequate. We initially concluded that the distribution was excellent for small loans to farms, good for home improvement loans, adequate for home purchase loans and small loans to businesses, and poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and refinance loans is considered good and adequate respectively.

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

Distribution of loans by borrower income in the Baltimore-Towson MSA is good. We initially concluded that the distribution was excellent for small loans to farms, good for home improvement and small loans to businesses, and adequate for home purchase and refinances loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home refinance loans is considered good.

## CD Lending

The volume and nature of the bank's CD lending had a positive effect on lending performance in the Baltimore-Towson MSA. WFB originated \$31 million in CD loans equal to 4.7 percent of allocated Tier 1 Capital.

We considered the shorter evaluation period for the Baltimore-Towson MSA in our assessment of CD loans.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Bethesda-Rockville-Frederick, MD is not inconsistent with the bank's overall **High Satisfactory** performance in Maryland. Performance in the limited-scope assessment area did not influence the Lending Test performance in Maryland.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Maryland is rated **Outstanding**. Based on a full-scope review, performance in the Baltimore-Towson MSA is excellent.

WFB's investment volume in the Baltimore-Towson MSA is excellent. During the evaluation period, WFB made 97 investments in the AA totaling \$24.4 million or 3.7 percent of allocated Tier 1 Capital. In addition, eight prior period investments totaling \$29.7 million or 4.5 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period investments add support for the assigned rating.

WFB's investments exhibit good responsiveness to the need for neighborhood stabilization and revitalization identified within the MSA.

Highlights of WFB's grants and investments that benefited Maryland include the following:

- WFB invested \$9.5 million in an affordable housing LIHTC in the Baltimore-Towson MSA. The investment was used for new construction of a housing development that will provide 74 units of housing to low-moderate income families in the assessment area.
- WFB invested \$1.2 million to finance housing and revitalization in an affordable housing project in the Baltimore-Towson MSA. The proceeds were used to finance an affordable rental housing project, which was one of the first affordable housing projects in the state to receive funds from the HUD Tax Credit Assistance Program (TCAP). Funded through the American Recovery and Reinvestment Act of 2009, TCAP allows state housing finance agencies to resume funding affordable rental housing projects while stimulating job creation

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

Performance under the Investment Test in the Bethesda-Rockville-Frederick, MD is weaker than the bank's overall **Outstanding** performance in Maryland. Performance in limited-scope areas did not influence the bank's Investment Test performance in Maryland.

## **SERVICE TEST**

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

WFB's Service Test performance in Maryland is rated **Outstanding**. Based on a full-scope review, performance in the Baltimore-Towson MSA is excellent.

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

The distribution of branches in the Maryland full-scope AA is excellent.

In the Baltimore-Towson MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the banks assessment area.

The percentage distribution of branches in low-income geographies is reasonably near to the percentage of the population residing in these geographies and is good. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

However, when considering 12 middle- and upper-income branches that are in close proximity to low-income and moderate-income geographies, accessibility improves in low-income geographies and is excellent.

WFB's ATM network offers adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

There were no branch openings or closings in the Maryland full-scope AA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences certain portions of the Maryland full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch hours are good and do not vary in a way that inconveniences certain portions of the Baltimore-Towson MSA, particularly low- and moderate-income geographies and individuals. One hundred percent of branches located in low- and moderate-income geographies in the Baltimore-Towson MSA, maintained Saturday hours, compared to 92 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provides an excellent level of CD services in the Maryland full-scope AA.

In the Baltimore-Towson MSA, WFB is a leader in providing CD services. WFB employees provided a total of 768 hours of CD services. These hours represented 117 CD service activities that benefited 49 different organizations and amounted to slightly more than five hours of CD services per branch per year.

Highlights of WFB's CD services that benefited Maryland include the following:

- A WFB employee serves as a board member and provides financial expertise for an affordable housing organization in the Baltimore-Towson MSA.
- A WFB employee taught a financial literacy course on managing finances and credit to a group of students in middle/high school with an 81 percent participation in the free and reduced lunch program in the Baltimore-Towson MSA.

- A WFB employee serves as a board member for a community services organization. In this capacity, the employee assists with fund raising activities, reviewing financials for the organization and provides financial literacy “best practices” to local small businesses in the Baltimore-Towson MSA.

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

Performance under the Service Test in the Bethesda-Rockville-Frederick MD was weaker than bank’s overall **Outstanding** performance in Maryland. Performance in limited-scope areas did not influence the Service Test performance in Maryland.

Refer to Tables 1 - 15 in the Maryland section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Michigan Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its Michigan full-scope AA.
- The geographic distribution of WFB's loans reflects excellent penetration throughout its Michigan full-scope AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its Michigan full-scope AA.
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its Michigan full-scope AA.
- WFB's delivery systems are readily accessible to all portions of its Michigan full-scope AA.
- WFB provided an adequate level of CD services in its Michigan full-scope AA.

## Description of Institution's Operations in the State of Michigan

Of the bank's 54 state and multistate rating areas, Michigan ranks 35th and accounts for 0.31 percent of total bank deposits, or \$2.6 billion as of June 30, 2012. WFB has two AAs in Michigan, which includes 18 out of 83 total counties in the state. Within the state, WFB operates 19 branches. WFB is the eleventh largest banking institution in Michigan with 1.6 percent of the deposit market share. Primary competitors include JP Morgan Chase, N.A., and Comerica Bank, with deposit market shares of 17.5 percent and 14.2 percent, respectively.

## Scope of Evaluation in the State of Michigan

Of WFB's two AAs in Michigan, the Northwestern Michigan Non-Metropolitan AA was selected for full-scope review. This AA accounts for only 25.8 percent of the bank's state deposits. However, 18 of the 19 branches in the state are located within this AA. The remaining deposits are identified with the one branch in the Grand Rapids-Wyoming MSA and are not associated with WFB's retail operations in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test in Michigan is rated **Outstanding**. Based on a full-scope review, performance in the Northwestern Michigan Non-Metropolitan AA is excellent.

### Lending Activity

The level of lending activity in the Northwestern Michigan Non-Metropolitan AA is excellent and is supported by an excellent level of lending activity for home purchase, home improvement, loans, and home refinance loans, a good level of lending activity for small loans to businesses, and an adequate level of lending activity for small loans to farms in relation to WFB's deposit market share percentage or ranking. We considered the number of non-deposit taking credit card lenders with market share in the AA and WFB's market share in dollar volume in our evaluation of lending activity for small loans to businesses and farms.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Northwestern Michigan Non-Metropolitan AA is excellent. The overall geographic distribution of loans is excellent for home purchase loans and small loans to businesses. Geographic distribution is good for refinance loans and small loans to farms and adequate for home improvement loans.

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

Distribution of loans by borrower income in the Northwestern Michigan Non-Metropolitan AA is good. The distribution is good for home purchase loans and small loans to businesses and farms and adequate for home improvement and refinances loans.

### CD Lending

The volume and nature of the bank's CD lending had a positive effect on lending performance in the Michigan full-scope AA.

WFB's CD lending had a positive effect on lending performance in the Northwestern Michigan Non-Metropolitan AA. During the evaluation period, WFB originated eight CD loans totaling \$4.7 million and equal to 6.1 percent of allocated Tier 1 Capital.

Thirty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Northwestern Michigan Non-Metropolitan AA include the following:

- In June 2010, WFB renewed a \$1.0 million unsecured line of credit for the purpose of providing working capital for a Tribal Entity located in rural Michigan. The borrower is a federally recognized Native American tribe that provides housing, education, health and social services to its members.
- In June 2009, WFB provided a \$100,000 line of credit for the purpose of providing working capital to a nonprofit organization located in Big Bay, Michigan. This organization is a year-round, not-for-profit therapy and wellness center for children and adults with physical disabilities.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Grand Rapids-Wyoming MSA is weaker than the bank's overall **Outstanding** performance in Michigan. Performance in the limited-scope assessment area did not influence the Lending Test performance in Michigan.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Michigan is rated **Outstanding**. Based on a full-scope review, performance in the Northwestern Michigan Non-Metropolitan AA is excellent.

WFB's investment volume in the Northwestern Michigan Non-Metropolitan AA is excellent. During the evaluation period, WFB made 23 grants and investments in the AA totaling \$11.1 million or 14.6 percent of allocated Tier 1 Capital. In addition, eight prior period investments totaling \$1.9 million or 2.6 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period investments add support for the assigned rating.

WFB's investments exhibited an excellent level of responsiveness to the need for neighborhood stabilization and revitalization identified within the AA.

Highlights of WFB's grants and investments that benefited Michigan include the following:

- WFB invested \$7.9 million to fund renovations to a medical facility in the Northwestern Michigan Non-Metropolitan AA. The majority of the clients served by this facility were Medicaid recipients.
- WFB invested \$2.4 million in a multifamily project located in the Northwestern Michigan Non-Metropolitan AA assessment area. This investment was part of a \$14.96 million investment in a LIHTC to fund affordable housing.

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

Performance under the Investment Test in the Grand Rapids-Wyoming MSA was stronger than bank's overall **High-Satisfactory** performance in Michigan. Performance in limited-scope areas did not influence the bank's Investment Test performance in Michigan.

## **SERVICE TEST**

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

WFB's Service Test performance in Michigan is rated **High Satisfactory**. Based on a full-scope review, performance in the Northwestern Michigan Non-Metropolitan AA is good.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Michigan full-scope AA is excellent.

In the Northwestern Michigan Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the bank's AA.

There are no low-income geographies in the AA so therefore our conclusions are based on the moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in the Michigan full-scope AA did not affect the branch distribution in a negative or positive way.

WFB's record of opening and closing branch offices in the Northwestern Michigan Non-Metropolitan AA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB opened one and closed seven branches throughout the assessment area resulting in a net gain of one branch in upper-income geography and a net loss of seven branches in middle-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences portions of the Michigan full-scope AA, particularly low-and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Northwestern Michigan Non-Metropolitan AA, particularly low- and moderate-income geographies and individuals.

Fifty percent of branches located in moderate-income geographies maintained Saturday hours compared to 100 percent of branches located in middle- and upper-income geographies.

### ***CD Services***

WFB provided an adequate level of CD services in the Michigan full-scope AA.

In the Northwestern Michigan Non-Metropolitan AA, WFB provides an adequate level of CD services. WFB employees provided a total of 101 hours of CD services. These hours represented 43 CD service activities that benefited nine different organizations, but amounted to slightly more than one hour of CD service per branch per year. We considered the limited opportunities for CD services in our evaluation of CD service performance.

Highlights of WFB's CD services that benefited the Northwestern Michigan Non-metropolitan AA include the following:

- A WFB employee serves as a board member to a community service organization in the Northwestern Michigan Non-Metropolitan AA. In this capacity, the team member reviews and approves the organization's financial statements, construction projects, assists with fundraising events and approves expenditures on a monthly basis.

- A WFB employee serves as a board member on a community service organization that provides financial literacy counseling services to low- and moderate-income individuals in the Northwestern Michigan Non-Metropolitan AA. The employee provides technical and financial expertise to the organization.

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

Performance under the Service Test in the Grand Rapids-Wyoming MSA was weaker than the bank's overall **High Satisfactory** performance in Michigan. Performance in limited-scope areas did not influence the Service Test performance in Michigan.

Refer to Tables 1 - 15 in the Michigan section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Minnesota Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Minnesota AA.
- The geographic distribution of WFB's loans reflects poor penetration throughout its full-scope Minnesota AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Minnesota AA.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Minnesota AA.
- WFB's delivery systems are readily accessible to essentially all portions of its full-scope Minnesota AA.
- WFB provides a limited level of CD services within its full-scope Minnesota AA..

### Description of Institution's Operations in the State of Minnesota

Of the bank's 54 state and multistate rating areas, Minnesota ranks 23rd and accounts for 0.8 percent of total bank deposits, or \$781 million as of June 30, 2012. WFB has six defined AAs in Minnesota, which include 75 out of 87 counties. Within the state, WFB operates 66 branches. WFB is the largest banking institution in Minnesota with 16.5 percent of the deposit market share. Primary competitors include US Bank, NA and Think Mutual Bank with deposit market shares of 5.1 percent and 2.5 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### Scope of Evaluation in the State of Minnesota

Of WFB's six AAs in Minnesota, the Greater Minnesota Non-Metropolitan AA was selected for full-scope review. This AA accounts for 58 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

WFB's Lending Test performance in Minnesota is rated **High Satisfactory**. Based on a full-scope review, performance in the Greater Minnesota Non-Metropolitan AA is good.

### Conclusions for Areas Receiving Full-Scope Reviews

#### Lending Activity

The level of lending activity in the Minnesota full-scope AA is excellent. The level of lending activity in Greater Minnesota Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans, and small loans to businesses and farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Minnesota full-scope AA is poor. In the Greater Minnesota Non-Metropolitan AA, the overall geographic distribution of loans is poor. The distribution is good for small loans to farms, adequate for small loans to businesses, and poor for home purchase, home improvement, and home refinance loans.

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

Distribution of loans by borrower income in Minnesota the full-scope AA is good. In the Greater Minnesota Non-Metropolitan AA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase and home improvement loans and adequate for home refinance loans and small loans to farms.

#### CD Lending

The volume and nature of the bank's CD lending had a positive effect on performance in the Minnesota full-scope AA.

WFB originated \$18.9 million in CD loans equal to 4.2 percent of allocated Tier 1 Capital. WFB's CD loans had a neutral effect on performance in the Greater Minnesota Non-Metropolitan AA. Eighteen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Minnesota full-scope AA include the following:

- In October 2010, WFB provided a \$3.4 million loan for construction of a 30-unit affordable LIHTC rental townhome development located in the designated underserved area of Worthington, Minnesota. The townhomes will be affordable to low- and moderate-income households. Four units are reserved for households meeting the definition of long-term homeless. The organization is a member of Neighborworks America.

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

Performance under the Lending Test in the Duluth and St. Cloud MSAs and the Northeastern Minnesota Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Minnesota. Performance under the Lending Test in Mankato-North Mankato and Rochester MSAs is stronger than the bank's overall **High Satisfactory** Performance in these limited-scope assessment areas did not influence the Lending Test performance in Minnesota.

### **INVESTMENT TEST**

WFB's Investment Test performance in Minnesota is rated **Outstanding**. Based on a full-scope review, performance in the Greater Minnesota Non-Metropolitan AA is excellent.

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

WFB's grant and investment volume in the Greater Minnesota Non-Metropolitan AA is excellent. During the evaluation period, WFB made 45 grants and investments in the AA totaling \$33.4 million or 7.3 percent of allocated Tier 1 Capital. In addition, 18 prior period grants and investments totaling \$12.1 million or 2.3 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the need for neighborhood revitalization and stabilization and affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited Minnesota include the following:

- In October 2009, WFB invested \$12.8 million through a NMTC in a Native American Community Redevelopment Corporation. The investment was used for construction

and financing of a new government services center in Nett Lake, Minnesota. The project is located on tribal land in a designated highly distressed area.

- In March 2009, WFB invested \$750,000 through an EQ2 in the Greater Minnesota Housing Fund. The current investment was used to expand the existing Affordable Housing Interim Loan Fund. This loan fund makes low-interest interim loans to affordable housing developers.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Duluth, Mankato-North Mankato, Rochester, and St. Cloud MSAs is not inconsistent with the bank's overall **Outstanding** performance in Minnesota. Performance under the Investment Test in Northeastern Minnesota Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Minnesota. Performance in limited-scope areas did not influence the Investment Test performance in Minnesota.

## SERVICE TEST

WFB's Service Test performance in Minnesota is rated **High Satisfactory**. Based on a full-scope review, performance in the Greater Minnesota Non-Metropolitan AA is good.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in the Minnesota full-scope AA is **excellent**.

In the Greater Minnesota Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Minnesota full-scope AA has not adversely affected the accessibility of its delivery systems.

WFB's record of opening and closing branches in the Greater Minnesota Non-Metropolitan AA, has not adversely affected the accessibility of its delivery systems. During the evaluation period, WFB closed four branches throughout the assessment area resulting in a net loss of two branches in moderate-income and two branches in middle-income geographies. However, overall branch distribution remained excellent.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences certain portions of the Minnesota full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Greater Minnesota Non-Metropolitan AA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 89 percent of branches located in those geographies maintained Saturday hours, compared to 85 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a poor level of CD services in the Minnesota full-scope AA.

In the Greater Minnesota Non-Metropolitan AA, WFB provided a limited level of CD services. WFB employees provided a total of 213 hours of CD services. These hours represented 63 CD service activities that benefited 10 different organizations, but amounted to slightly less than one and a half hours of CD service per branch per year.

Highlights of WFB's CD services that benefited Minnesota include the following:

- A WFB employee is an active participant on the board of directors of a food bank with a mission to distribute food and other resources to participating agencies, and to educate the public about hunger and its solutions.

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

Performance under the Service Test in the Duluth MSA is not inconsistent with the bank's overall **High Satisfactory** performance in Minnesota. Performance under the

Service Test in Mankato-North Mankato, Rochester, and St. Cloud MSAs and the Northeastern Minnesota Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Minnesota. Performance in limited-scope areas did not influence the Service Test performance in Minnesota.

Refer to Tables 1 - 15 in the Minnesota section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Mississippi Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Mississippi AAs.
- The distribution of WFB's loans reflects adequate penetration throughout its full-scope Mississippi AAs.
- WFB's borrower distribution reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Mississippi AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Mississippi AAs.
- WFB's delivery systems are readily accessible to essentially all portions of its full-scope Mississippi AAs.
- WFB's branch hours vary in a way that inconveniences certain portions of its full-scope Mississippi AAs.

### Description of Institution's Operations in the State of Mississippi

Of the bank's 54 state and multistate rating areas, Mississippi ranks 49th and accounts for 0.1 percent of total bank deposits, or \$603 million as of June 30, 2012. WFB has four defined AAs in Mississippi, which include 13 of 82 counties. Within the state, WFB operates 12 branches. WFB is the 12th largest banking institution in Mississippi with 1.4 percent of the deposit market share. Primary competitors include Regions Bank and Trustmark National Bank with deposit market shares of 15.2 percent and 14.7 percent, respectively.

Because WFB's branches in the state of Mississippi have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Mississippi

Of WFB's four AAs in Mississippi, the Jackson and Gulfport-Biloxi MSAs were selected for full-scope review. These AAs account for 66 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

WFB's Lending Test performance in Mississippi is rated **Outstanding**. Based on full-scope reviews, performance in the Jackson MSA is excellent and in the Gulfport-Biloxi MSA is good.

## Conclusions for Areas Receiving Full-Scope Reviews

### Lending Activity

The level of lending activity in Mississippi full-scope AAs is excellent.

The level of lending activity in the Jackson MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and a very poor level of activity for small loans to businesses and farms in relation to WFB's deposit market share.

The level of lending activity in the Gulfport-Biloxi MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans, a good level of activity for small loans to businesses and an adequate level of activity for home improvement loans and small loans to farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the large number of farm lenders in the AA.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Mississippi full-scope AAs is adequate.

In the Jackson MSA, the overall geographic distribution of loans is adequate. We initially concluded that the distribution was poor for home purchase and home refinance loans, adequate for home improvement loans and small loans to businesses, and excellent for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated

relative to all other lenders in the AA, performance improved and distribution of home refinance loans is considered adequate.

In the Gulfport-Biloxi MSA, the overall geographic distribution of loans is adequate. We initially concluded that the distribution was poor for home purchase loans, very poor for home refinance loans, good for home improvement loans and small loans to businesses, and excellent for small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home refinance loans is considered poor.

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

Distribution of loans by borrower income in Mississippi full-scope AAs is good. In the Jackson MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase and home improvement loans, excellent for small loans to businesses and farms, and poor for home refinance loans.

In the Gulfport-Biloxi MSA, the overall distribution of loans by borrower income is good. The distribution is adequate for home purchase and home refinance loans, good for home improvement loans, and excellent for small loans to businesses and farms.

When we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA, performance improved. As a result of these factors, we determined that distribution of home refinance loans by borrower income should be adjusted. Although the home refinance loan conclusion did not change, the overall borrower distribution for the Gulfport-Biloxi MSA improved.

### **CD Lending**

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Mississippi full-scope AAs.

WFB originated a \$5.4 million CD loan equal to 21.3 percent of allocated Tier 1 Capital. WFB's CD lending had a significantly positive effect on Lending Test performance in the Jackson MSA. WFB's CD loan was considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

WFB's CD loans had a significantly positive effect on Lending Test performance in the Gulfport-Biloxi MSA. WFB originated a \$12 million CD loan equal to 63.4 percent of

allocated Tier 1 Capital. The CD loan was to the need for affordable housing identified in the AA.

Highlights of WFB's CD lending that benefited Mississippi include the following:

- In January 2012, WFB provided a \$5.5 million loan for the purpose of funding the construction of a 104-unit LIHTC senior affordable housing complex located in a low-income census tract in Jackson, Mississippi.
- In August 2011, WFB originated a \$12 million for the purpose of constructing a 131-unit LIHTC single-family rental development in Gulfport, Mississippi. The borrower is constructing a 131-unit LIHTC single-family rental development, consisting of 65 three-bedroom homes and 66 four-bedroom homes.

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

Performance under the Lending Test in the Hattiesburg and Pascagoula MSAs is weaker than the bank's overall **Outstanding** performance in Mississippi. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Mississippi.

## **INVESTMENT TEST**

WFB's Investment Test performance in Mississippi is rated **Outstanding**. Based on full-scope reviews, performance in the Jackson and Gulfport-Biloxi MSAs is excellent.

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

WFB's grant and investment volume in the Jackson MSA is excellent. During the evaluation period, WFB made nine grants and investments in the AA totaling \$1.7 million or 6.8 percent of allocated Tier 1 Capital.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need for affordable housing identified in the AA.

WFB's grant and investment volume in the Gulfport-Biloxi MSA is excellent. During the evaluation period, WFB made six grants and investments in the AA totaling \$6.3 million or 33.5 percent of allocated Tier 1 Capital.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited Mississippi full-scope AAs include the following:

- In August 2010, WFB invested \$2.2 million in the Holliman Place Apartments, a 132-unit affordable housing project located in Gulfport, Mississippi. This project was part of a \$50 million investment in a national LIHTC fund.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Hattiesburg MSA is not inconsistent with the bank's overall **Outstanding** performance in Mississippi. Performance under the Investment Test in the Pascagoula MSA is weaker than the bank's overall **Outstanding** performance in Mississippi. Performance in limited-scope areas did not influence the Investment Test performance in Mississippi.

## SERVICE TEST

WFB's Service Test performance in Mississippi is rated **High Satisfactory**. Based on full-scope reviews, performance in the Jackson MSA is adequate and in the Gulfport-Biloxi MSA is good.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Mississippi full-scope AAs is good.

In the Jackson MSA, WFB's distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of the MSA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies was significantly below the population residing in these geographies. WFB has no branches in moderate-income geographies although almost 19 percent of the population lives in moderate-income geographies.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Gulfport-Biloxi MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

There were no branch openings or closings in the Mississippi full-scope AAs during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services vary in a way that inconveniences certain portions of Mississippi full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are poor and vary in a way of that inconveniences certain portions of the Jackson MSA, particularly low- and moderate-income geographies and individuals. No branches located in low- and moderate-income geographies maintained Saturday hours, compared to 33 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are poor and vary in a way of that inconveniences certain portions of the Gulfport-Biloxi MSA, particularly low- and moderate-income geographies and individuals. No stores located in low- and moderate-income geographies maintained Saturday hours, compared to 100 percent of stores located in middle- and upper-income geographies.

### **CD Services**

WFB provided an adequate level of CD services in Mississippi full-scope AAs.

In the Jackson MSA, WFB provided an adequate level of CD services. WFB employees provided a total of 26 hours of CD services. These hours represented 15 different CD service activities that benefited three different organizations and amounted to almost two and a half hours of CD service per branch per year.

In the Gulfport-Biloxi MSA, WFB provided an adequate level of CD services. WFB employees provided a total of 13.5 hours of CD services. These hours represented three different CD service activities that benefited three different organizations and amounted to slightly more than one and a half hours of CD service per branch per year.

Highlights of WFB's CD services that benefited Mississippi full-scope AAs include the following:

- WFB employees provided Hands on Banking and Teach Children to Save classes to elementary schools in the Jackson and Gulfport-Biloxi MSAs.

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

Performance under the Service Test in Hattiesburg and Pascagoula MSA is weaker than the bank's overall **High Satisfactory** performance in Mississippi. Performance in limited-scope areas did not influence the Service Test performance in Mississippi.

Refer to Tables 1 - 15 in the Mississippi section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Montana Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Montana AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Montana AAs.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Montana AAs..
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Montana AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Montana AAs.
- WFB provides a relatively high level of CD services within its full-scope Montana AAs..

## Description of Institution's Operations in the State of Montana

Of the bank's 54 state and multistate rating areas, Montana ranks 37th and accounts for 0.3 percent of total bank deposits, or \$2.11 billion as of June 30, 2012. WFB has seven defined AAs in Montana, which include 27 out of 56 counties and all MSAs in the state. Within the state, WFB operates 45 branches. WFB is the third largest banking institution in Montana with 11.2 percent of the deposit market share. Primary competitors include First Interstate Bank and Glacier Bank, with deposit market shares of 15.8 percent and 15.4 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Montana

Of WFB's seven AAs in Montana, the Billings MSA and Greater Montana Non-Metropolitan AAs were selected for full-scope review. These AAs account for 72.8 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Montana is rated **High Satisfactory**. Based on full-scope reviews, performance in the Billings MSA and Greater Montana Non-Metropolitan AA is good.

### Lending Activity

The level of lending activity in Montana full-scope AAs is excellent.

The level of lending activity in the Billings MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

The level of lending activity in the Greater Montana Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Montana full-scope AAs is good.

In the Billings MSA, the overall geographic distribution of loans is adequate. The distribution is good for home purchase loans and small loans to businesses, adequate for home improvement loans, poor for refinance loans and very poor for small loans to farms.

In the Greater Montana Non-Metropolitan AA, the overall geographic distribution of loans is good. We initially concluded that the distribution was excellent for small loans to businesses, good for home purchase loans, poor for home refinance loans, and very poor for home improvement loans and small loans to farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications in the AA, performance improved and distribution of home refinance loans was adequate.

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

Distribution of loans by borrower income in Montana full-scope AAs is good.

In the Billings MSA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase and home refinance loans and small loans to farms, and adequate for home improvement loans.

In the Greater Montana Non-Metropolitan AA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase loans, and adequate for home improvement and home refinance loans and small loans to farms.

## CD Lending

The volume and nature of the bank's CD lending had a positive effect on performance in Montana full-scope AAs.

WFB's CD lending had a significantly positive effect on Lending Test performance in the Billings MSA. WFB originated \$3.47 million in community development loans equal to 6.4 percent of allocated Tier 1 Capital. Eighty-one percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

WFB's CD loans had a neutral effect on performance in the Greater Montana Non-Metropolitan AA. WFB originated \$5.99 million in CD loans equal to 5.0 percent of allocated Tier 1 Capital. Sixty-five percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited Montana full-scope AAs include the following:

- WFB converted an existing \$1 million term loan to a tax-exempt loan and increased it by \$110,000 for a non-profit organization. The funds were used to finance the purchase and renovation of an office building that housed an organization that provides mental health, alcohol, and chemical dependency services.
- WFB provided a \$3.9 million term loan for a LIHTC affordable senior housing project in Butte, Montana. The development consists of 48 units affordable to low- and moderate-income households.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Fallon County Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Montana. Performance under the Lending Test in Eastern Montana and Mineral County Non-

Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Montana. Performance under the Lending Test in the Great Falls and Missoula MSAs is stronger than the bank's overall **High Satisfactory** performance in Montana. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Montana.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Montana is rated **Outstanding**. Based on full-scope reviews, performance in the Billings MSA and Greater Montana Non-Metropolitan AA is excellent.

WFB's grant and investment volume in the Billings MSA is excellent. During the evaluation period, WFB made 18 grants and investments in the AA totaling \$27.6 million or 51.0 percent of allocated Tier 1 Capital. In addition, two prior period grants and investments totaling \$1.9 million or 3.5 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the need for neighborhood stabilization and revitalization and affordable housing.

WFB's grant and investment volume in the Greater Montana Non-Metropolitan AA is excellent. During the evaluation period, WFB made 23 grants and investments in the AA totaling \$20.1 million or 16.8 percent of allocated Tier 1 Capital. In addition, 14 prior period grants and investments totaling \$6.5 million or 5.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited Montana full-scope AAs include the following:

- In the Greater Montana Non-Metropolitan AA, WFB formed a limited partnership with Mountain Plains Equity Group to invest equity capital in new apartment buildings that qualify for LIHTCs. This was done to provide a better mechanism to locate and invest in affordable housing properties in smaller states and smaller markets.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Mineral County Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Montana.

Performance under the Investment Test in Eastern Montana and Fallon County Non-Metropolitan AAs and Great Falls and Missoula MSAs is weaker than the bank's overall **Outstanding** performance in Montana. Performance in limited-scope areas did not influence the Investment Test performance in Montana.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in Montana is rated **High Satisfactory**. Based on full-scope reviews, performance in the Billings MSA is good and in the Greater Montana Non-Metropolitan AA is excellent.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in Montana full-scope AAs is excellent.

In the Billings MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the institution's assessment area. WFB has no branches in low-income geographies. Because only two percent of the MSA population resides in these geographies, we put greater weight on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Greater Montana Non-Metropolitan AA, distribution of branches is excellent. Delivery systems are readily accessible to all portions of the institution's assessment area. WFB has no branches in low-income geographies. Because only two percent of the MSA population resides in these geographies, we put greater weight on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in Montana did not affect the branch distribution in a negative or positive way.

WFB did not open or close any branches in the Billings MSA and Greater Montana Non-Metropolitan AA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are tailored to the convenience and needs of the Montana full-scope AAs, particularly moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Billings MSA, particularly moderate-income geographies and individuals. One hundred percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to 57 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are excellent and tailored to the convenience and needs of the Greater Montana Non-Metropolitan AA, particularly moderate-income geographies and individuals. Fifty percent of branches located in moderate-income geographies maintained Saturday hours, compared to 22 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in Montana full-scope AAs.

In the Billings MSA, WFB provides a good level of CD services. WFB employees provided a total of 85 hours of CD services. These hours represented 28 CD service activities that benefited seven different organizations and amounted two and a half hours of CD service per branch per year.

In the Greater Montana Non-Metropolitan AA, WFB provides a good level of CD services. WFB employees provided a total of 281 hours of CD services. These hours represented 53 CD service activities that benefited seven different organizations and amounted to slightly more than two and a half hours of CD service per branch per year.

We considered the limited opportunities for CD services in the Billings MSA and the Greater Montana Non-Metropolitan AA in our evaluation.

Highlights of WFB's CD services that benefited Montana include the following:

- WFB employees presented Hands On Banking classes to various CD qualified organizations in the AA.
- A WFB employee assisted a non-profit affordable housing organization prepare grant applications.

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

Performance under the Service Test in the Eastern Montana, Fallon County, and Mineral County Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in Montana. Performance under the Service Test in the Great Falls and Missoula MSAs is stronger than the bank's overall **High Satisfactory** performance in Montana. Performance in limited-scope areas did not influence the Service Test performance in Montana.

Refer to Tables 1 - 15 in the Montana section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Nebraska Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Nebraska AAs.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Nebraska AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Nebraska AAs.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Nebraska AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope Nebraska AAs.
- WFB's branch hours do not vary in a way that inconveniences portions of its full-scope Nebraska AAs.

### Description of Institution's Operations in the State of Nebraska

Of the bank's 54 state and multistate rating areas, Nebraska ranks 36th and accounts for 0.3 percent of total bank deposits, or \$2.1 billion as of June 30, 2012. WFB has seven defined AAs in Nebraska, which include 20 of 93 total counties in the state. Within the state, WFB operates 24 branch offices. WFB is the largest banking institution in Nebraska with 7.1 percent of the deposit market share. Primary competitors include Pinnacle Bank and Union Bank and Trust Company with deposit market shares of 6.4 percent and 6.1 percent, respectively.

### Scope of Evaluation in the State of Nebraska

Of WFB's seven AAs in Nebraska, the Lincoln MSA and the Tri-City Non-Metropolitan AA were selected for full-scope review. These AAs account for 82 percent of the bank's state deposits and are the most significant AA in the state.

## LENDING TEST

WFB's Lending Test performance in Nebraska is rated **High Satisfactory**. Based on full-scope reviews, performance in the Lincoln MSA and in the Tri-City Non-Metropolitan AA is good.

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

The level of lending activity in Nebraska full-scope AAs is excellent. The level of lending activity in the Lincoln MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to businesses, a good level of activity for small loans to farms, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share.

The level of lending activity in the Tri-City Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Nebraska full-scope AAs is adequate.

In the Lincoln MSA, the overall geographic distribution of loans is adequate. The distribution is excellent for home improvement loans, good for small loans to businesses, adequate for home purchase loans and small loans to farms, and poor for home refinance loans.

In the Tri-City Non-Metropolitan AA, the overall geographic distribution of loans is adequate. The distribution is excellent for small loans to businesses and farms, poor for home purchase loans, and very poor for home improvement and home refinance loans.

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

Distribution of loans by borrower income in Nebraska full-scope AAs is good.

In the Lincoln MSA, the overall distribution of loans by borrower income is good. The distribution is excellent for home purchase loans and small loans to businesses, good for home improvement and home refinance loans, and adequate for small loans to farms.

In the Tri-City Non-Metropolitan AA, the overall distribution of loans by borrower income is good. The distribution is excellent for home purchase loans, good for home improvement and home refinance loans and small loans to businesses, and poor for small loans to farms.

## CD Lending

The volume and nature of the bank's CD Lending had a neutral effect on performance in Nebraska full-scope AAs.

WFB's CD lending had a positive effect on Lending Test performance in the Lincoln MSA. WFB originated \$9.1 million in CD loans equal to 7.3 percent of allocated Tier 1 Capital.

WFB's CD loans had a neutral effect on Lending Test performance in the Tri-City Non-Metropolitan AA. WFB originated \$1.3 million in CD loans equal to 1.8 percent of allocated Tier 1 Capital.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the North Platte Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Nebraska. Performance under the Lending Test in Norfolk Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in Nebraska. Performance under the Lending Test in Northern Nebraska, Red Willow County, and Western Nebraska Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in Nebraska. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Nebraska.

## INVESTMENT TEST

WFB's Investment Test performance in Nebraska is rated **Outstanding**. Based on full-scope reviews, performance is excellent in the Lincoln MSA and Tri-City Non-Metropolitan AA.

## Conclusions for Areas Receiving Full-Scope Reviews

WFB's grant and investment volume in the Lincoln MSA is excellent. During the evaluation period, WFB made 22 grants and investments in the AA totaling \$7.7 million or 6.2 percent of allocated Tier 1 Capital. In addition, five prior period grants and investments totaling \$3.8 million or 3.0 percent of allocated Tier 1 Capital remained

outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the need for affordable housing identified in the AA.

WFB's grant and investment volume in the Tri-City Non-Metropolitan AA is excellent. During the evaluation period, WFB made 25 grants and investments in the AA totaling \$18 million or 25.4 percent of allocated Tier 1 Capital. In addition, seven prior period grants and investments totaling \$6.4 million or 9.0 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited Nebraska include the following:

- In December 2008, WFB invested \$1.77 million in the Stoneridge Apartments, a 24-unit affordable housing complex located in Kearney, Nebraska. This investment was part of a \$10 million investment in the Nebraska Fund XIII, offered by the Midwest Housing Equity Group. The Nebraska Fund is a private limited partnership formed for the purpose of investing in affordable housing developments in Nebraska that qualify for housing tax credits.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in North Platte Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Nebraska.

Performance under the Investment Test in Norfolk, Northern Nebraska, Red Willow County, and

Western Nebraska Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in Nebraska. Performance in limited-scope areas did not influence the Investment Test performance in Nebraska.

## SERVICE TEST

WFB's Service Test performance in Nebraska is rated **High Satisfactory**. Based on full-scope reviews, performance is good in the Lincoln MSA and Tri-City Non-Metropolitan AA.

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

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Nebraska full-scope AAs is excellent.

In the Lincoln MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Tri-City Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

We did not assess distribution in low-income geographies because there are no low-income geographies in the AA.

The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

#### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in Nebraska full-scope AAs did not affect the branch distribution in a negative or positive way.

WFB's record of opening and closing branch offices in the Lincoln MSA, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed two branches throughout the assessment area resulting in a net loss of one branch in a middle-income geography and one branch in an upper-income geography.

WFB's record of opening and closing branch offices in the Tri-City Non-Metropolitan AA, did not affect the branch distribution in a negative or positive way. During the evaluation

period, WFB closed one branch throughout the assessment area resulting in a net loss of one branch in a middle-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences portions of Nebraska full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Lincoln MSA, particularly low- and moderate-income geographies and individuals. Eighty percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to 100 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Tri-City Non-Metropolitan AA, particularly moderate-income geographies and individuals. One hundred percent of branches located in moderate-income geographies maintained Saturday hours compared to 100 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an excellent level of CD services in Nebraska full-scope AAs.

In the Lincoln MSA, WFB is a leader in providing CD services. WFB employees provided a total of 449 hours of CD services. These hours represented 85 different CD service activities that benefited 17 different organizations and amounted to almost 12 hours of CD service per branch per year.

In the Tri-City Non-Metropolitan AA, WFB is a leader in providing CD services. WFB employees provided a total of 264 hours of CD services. These hours represented 67 CD service activities that benefited 22 different organizations and amounted to slightly more than 10 hours of CD services per branch per year.

Highlights of WFB's CD Services that benefited Nebraska full-scope AAs include the following:

- WFB employees provided Hands on Banking training to numerous CD qualified organizations throughout Nebraska.
- A WFB employee actively participates in finance committee of a local Habitat for Humanity chapter.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in North Platte, Northern Nebraska, Red Willow County, and Western Nebraska Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in Nebraska. Performance under the Service Test in the Norfolk Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in Nebraska. Performance in limited-scope areas did not influence the Service Test performance in Nebraska.

Refer to Tables 1 - 15 in the Nebraska section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of New Mexico Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope New Mexico AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope New Mexico AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope New Mexico AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope New Mexico AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope New Mexico AAs.
- WFB provides a relatively high level of CD services within its full-scope New Mexico AAs.

### Description of Institution's Operations in the State of New Mexico

Of the bank's 54 state and multistate rating areas, New Mexico ranks 24th and accounts for 0.8 percent of total bank deposits, or \$735 million as of June 30, 2012. WFB has five defined AAs in New Mexico, which include all 33 counties in the state. Within the state, WFB operates 95 branch offices. WFB is the largest banking institution in New Mexico with 24.9 percent of the deposit market share. Primary competitors include Bank of America, NA and Los Alamos National Bank with deposit market shares of 14.1 percent and 5.2 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### Scope of Evaluation in the State of New Mexico

Of WFB's five AAs in New Mexico, the Albuquerque MSA and Greater New Mexico Non-Metropolitan AAs were selected for full-scope review. These AAs account for 81 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

WFB's Lending Test performance in New Mexico is rated **Outstanding**. Based on full-scope reviews, performance in the Albuquerque MSA and the Greater New Mexico Non-Metropolitan AA is excellent.

### Conclusions for Areas Receiving Full-Scope Reviews

#### Lending Activity

The level of lending activity in New Mexico full-scope AAs is excellent.

The level of lending activity in the Albuquerque MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to businesses and farms and a good level of activity for home improvement loans in relation to WFB's deposit market share.

The level of lending activity in the Greater New Mexico Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in New Mexico full-scope AAs is good.

In the Albuquerque MSA, the overall geographic distribution of loans is good. The distribution is excellent for home improvement loans, good for home purchase and home refinance loans and small loans to businesses, and adequate for small loans to farms.

In the Greater New Mexico Non-Metropolitan AA, the overall geographic distribution of loans is adequate. The distribution was excellent for small loans to businesses and farms, adequate for home improvement loans, poor for refinance loans, and very poor for home purchase loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and credit demand as indicated by HMDA applications, performance improved and distribution of home purchase is considered poor.

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

Distribution of loans by borrower income in New Mexico full-scope AAs is good. In the Albuquerque MSA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase and home improvement loans and small loans to farms, and adequate for home refinance loans.

In the Greater New Mexico Non-Metropolitan AA, the overall distribution of loans by borrower income is good. We initially concluded that the distribution was excellent for small loans to businesses, good for small loans to farms, adequate for home improvement loans, and poor for home purchase and home refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and home refinance loans is considered adequate.

## **CD Lending**

The volume and nature of the bank's CD Lending had a significantly positive effect on performance in New Mexico full-scope AAs.

WFB's CD loans had a significantly positive effect on performance in the Albuquerque MSA. WFB originated \$50.9 million in CD loans equal to 10.9 percent of allocated Tier 1 Capital. Ninety percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

WFB's CD loans had a significantly positive effect on performance in the Greater New Mexico Non-Metropolitan AA. WFB originated \$8.8 million in CD loans equal to 7.0 percent of allocated Tier 1 Capital. Eighty percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD Lending that benefited New Mexico full-scope AAs include the following:

- In December 2010, WFB provided a \$4.0 million loan for construction financing of a 66-unit affordable LIHTC apartment development located in a low-income area of Albuquerque, New Mexico. The limited liability partnership was formed for the express purpose of holding this property by a nonprofit organization that was established in 1993 for the purpose of building affordable housing. They are

dedicated to raising the economic and social levels of the residents of Albuquerque by providing affordable housing opportunities via single-family developments and, more recently, rental property developments.

- In March 2010, WFB provided a \$715,000 line of credit to finance the construction and remodel of a medical office building located in a distressed middle-income census tract in Truth Or Consequences, New Mexico. This borrower was established in 1992 for the purpose of acquiring property and procuring construction funding for new clinics. They operate facilities statewide that provide dental and medical services. Of the clients served by this organization, 75 percent are considered low- and moderate-income.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in Farmington, Las Cruces, and Santa Fe MSAs is weaker than the bank's overall **Outstanding** performance in New Mexico. Performance in these limited-scope assessment areas did not influence the Lending Test performance in New Mexico.

## INVESTMENT TEST

WFB's Investment Test performance in New Mexico is rated **Outstanding**. Based on full-scope reviews, performance in the Albuquerque MSA and the Greater New Mexico Non-Metropolitan AA is excellent.

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's grant and investment volume in the Albuquerque MSA is excellent. During the evaluation period, WFB made 62 grants and investments in the AA totaling \$26.1 million or 5.0 percent of allocated Tier 1 Capital. In addition, 11 prior period grants and investments totaling \$8.8 million or 1.9 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing and neighborhood revitalization and stabilization identified in the AA.

WFB's grant and investment volume in the Greater New Mexico Non-Metropolitan AA is excellent. During the evaluation period, WFB made 21 grants and investments in the AA totaling \$14.7 million or 11.7 percent of allocated Tier 1 Capital. In addition, seven prior period grants and investments totaling \$5.7 million or 4.6 percent of allocated Tier

1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited the New Mexico full-scope AAs include the following:

- In December 2011, WFB invested \$400,000 through an EQ2 in a nonprofit CDC based in Albuquerque, New Mexico. The funds from this investment were used for predevelopment working capital to assist families, elderly, and physically/developmentally disabled persons through acquisition, rehabilitation, and new construction of rental apartments and single-family homes.
- In November 2011, WFB invested a total of \$850,000 through an EQ2 in the New Mexico Mortgage Finance Authority (MFA), the state's official housing agency, located in Albuquerque, New Mexico. The funds will be used to further capitalize one of MFA's existing loan programs, the Primero Loan Program that targets all regions of New Mexico, including rural communities and colonies, \$425,000 of these funds will go to finance projects in the Greater New Mexico Non-Metropolitan area. The Primero Loan Program is a flexible, low cost loan program created in 1993 to finance the development of affordable single-family or special needs residential facilities in New Mexico that would be considered "high risk" by traditional lenders.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Farmington and Santa Fe MSAs is not inconsistent with the bank's overall **Outstanding** performance in New Mexico.

Performance under the Investment Test in Las Cruces MSA is weaker than the bank's overall **Outstanding** performance in New Mexico. Performance in limited-scope areas did not influence the Investment Test performance in New Mexico.

## SERVICE TEST

WFB's Service Test performance in New Mexico is rated **High Satisfactory**. Based on full-scope reviews, performance in the Albuquerque MSA and Greater New Mexico Non-Metropolitan AA is good.

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

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in New Mexico full-scope AAs is excellent.

In the Albuquerque MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Greater New Mexico Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the AA.

WFB has no branches in low-income geographies in the AA. However, because the percentage of the population residing in these geographies was less than five percent of the AA population, our conclusion put more weight on performance in moderate-income geographies.

The percentage distribution of branches in moderate-income geographies is reasonably near the percentage of the population residing in these geographies and is good.

However, when considering three branches in middle- and upper-income branch locations that are in close proximity to moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

#### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in New Mexico full-scope AAs did not affect the branch distribution in a negative or positive way.

WFB's record of opening and closing branch offices in the Albuquerque MSA did not affect the branch distribution in a negative or positive way. During the evaluation

period, WFB closed one branch throughout the assessment area resulting in a net loss of one branch in middle- income geography.

WFB did not open or close any branches in the Greater New Mexico Non-Metropolitan AA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences certain portions of New Mexico full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences portions of the Albuquerque MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 71 percent of branches located in those geographies maintained Saturday hours, compared to 85 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Greater New Mexico Non-Metropolitan AA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 86 percent of branches located in those geographies maintained Saturday hours, compared to 52 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in New Mexico full-scope AAs.

In the Albuquerque MSA, WFB is a leader in providing CD services. WFB employees provided a total of 1,528 hours of CD Services. These hours represented 418 CD service activities that benefited 48 different organizations and amounted to almost 10 hours of CD service per branch per year.

In the Greater New Mexico Non-Metropolitan AA, WFB provided a limited level of CD services. WFB employees provided a total of 55 hours of CD services. These hours represented 34 CD service activities that benefited 17 different organizations and amounted to less than a half hour of CD service per branch per year. We considered the limited opportunities for CD Services in our evaluation of the AA.

Highlights of WFB's CD Services that benefited the New Mexico include the following:

- A WFB employee is an active participant on the board of directors of nonprofit organization with a mission to develop vibrant, prosperous neighborhoods through

the creation and stewardship of permanently affordable housing and sustainable economic opportunities.

- A WFB employee is an active participant on the Albuquerque Affordable Housing Committee. The employee advises the City on policies and activities related to affordable housing.

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

Performance under the Service Test in the Farmington and Las Cruces MSAs is stronger than the bank's overall **High Satisfactory** performance in New Mexico. Performance under the Service Test in the Santa Fe MSA is weaker than the bank's overall **High Satisfactory** performance in New Mexico. Performance in limited-scope areas did not influence the Service Test performance in New Mexico.

Refer to Tables 1 - 15 in the New Mexico section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of New York Rating

<b>CRA rating for the state:</b>	<b>Outstanding</b>
<b>The Lending Test is rated:</b>	<b>Outstanding</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope New York AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope New York AA.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its full-scope New York AA..
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope New York AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its full-scope New York AA.

## Description of Institution's Operations in the State of New York

Of the bank's 54 state and multistate rating areas, New York ranks 40th and accounts for 0.2 percent of total bank deposits, or \$1.9 billion as of June 30, 2012. WFB has three defined AAs in New York, which include five of the sixty-two total counties in the state. Within the state, WFB operates 21 branch offices. WFB is the 19th largest banking institution in New York with 0.9 percent of the deposit market share. Primary competitors include Manufacturers and Traders Trust Company and JP Morgan Chase Bank, NA with deposit market shares of 11.6 percent and 10.7 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of New York

Of WFB's three AAs in New York, the Nassau-Suffolk MD was selected for a full-scope review. This AA accounts for 46 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

WFB's Lending Test performance in New York is rated **Outstanding**. Based on a full-scope review, performance in the Nassau-Suffolk MD is excellent.

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

The level of lending activity in the New York full-scope AA is excellent. The level of lending activity in Nassau-Suffolk MD is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and a good level of activity for small loans to farms in relation to WFB's deposit market share. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the number of farm lenders in the AA.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the New York full-scope AA is adequate. In the Nassau-Suffolk MD, the overall geographic distribution of loans is adequate. The distribution is excellent for small loans to farms, good for home purchase loans, and adequate for home improvement and home refinance loans and small loans to businesses.

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

Distribution of loans by borrower income in the New York full-scope AA is good. In the Nassau-Suffolk MD, the overall distribution of loans by borrower income is good. We initially concluded that the distribution was excellent for small loans to farms, good for home purchase and home improvement loans and small loans to businesses and adequate for refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is considered good.

### CD Lending

The volume and nature of the bank's CD Lending had a significantly positive effect on performance in the New York full-scope AA.

WFB's CD loans had a significantly positive effect on performance in the Nassau-Suffolk MD. WFB originated \$14.9 million in CD loans equal to 14.8 percent of

allocated Tier 1 Capital. Fifty percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA. The dollar volume of loans was considered highly responsive to identified community needs.

Highlights of WFB's CD Lending that benefited the New York full-scope AA include the following:

- In June 2012, WFB provided a \$9.7 million loan for constructing a hotel located in a moderate-income area of Central Islip, New York. The construction of the hotel is phase one in a three-phase project to revitalize and stabilize the neighborhood and will bring an estimated 30 jobs to the surrounding community.

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

Performance under the Lending Test in the Kingston and Poughkeepsie-Newburgh-Middletown MSAs is weaker than the bank's overall **Outstanding** performance in New York. Performance in these limited-scope assessment areas did not influence the Lending Test performance in New York.

## **INVESTMENT TEST**

WFB's Investment Test performance in New York is rated **Outstanding**. Based on a full-scope review, performance in the Nassau-Suffolk MD is excellent.

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

WFB's grant and investment volume in the Nassau-Suffolk MD is excellent. During the evaluation period, WFB made 40 grants and investments in the AA totaling \$9 million or 8.9 percent of allocated Tier 1 Capital. In addition, one prior period investment of \$8.9 million or 8.8 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments were responsive to the need for affordable housing primarily through the purchase of Fannie Mae mortgage-backed securities.

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

Performance under the Investment Test in Poughkeepsie-Newburgh-Middletown MSA is not inconsistent with the bank's overall **Outstanding** performance in New York. Performance under the Investment Test in the Kingston MSA is weaker than the bank's

overall **Outstanding** performance in New York. Performance in limited-scope areas did not influence the Investment Test performance in New York.

## SERVICE TEST

WFB's Service Test performance in New York is rated **Low Satisfactory**. Based on a full-scope review, performance in the Nassau-Suffolk MD is adequate.

### Conclusions for Areas Receiving Full-Scope Reviews

#### Retail Banking Services

##### *Accessibility of Delivery Systems*

WFB's distribution of branches in the New York full-scope AA is adequate.

In the Nassau-Suffolk MD, WFB's distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of the MD.

WFB had no branches in low-income geographies. Because less than five percent of the population resides in these geographies, our conclusions relied more heavily on performance in moderate-income geographies.

The percentage distribution of branches in moderate-income geographies is well below the percentage of the population residing in these geographies and is poor.

However, when considering one branch in a middle-income branch location that is in close proximity to a moderate-income geography, accessibility improves in moderate-income geographies and is adequate.

##### *Changes in Branch Location*

To the extent changes have been made, WFB's record of opening and closing branch offices in the New York full-scope AA did not affect the branch distribution in a negative or positive way.

WFB's record of opening and closing branch offices in the Nassau-Suffolk MD, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB opened two and closed two branches throughout the assessment area resulting in a net gain of zero branches in middle- and upper-income geographies.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences portions of the New York full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Nassau-Suffolk MD, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 92 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a poor level of CD services in the New York full-scope AA.

In the Nassau-Suffolk MD, WFB provided a limited level of CD services. WFB employees provided a total of 38 hours of CD services. These hours represented 13 CD service activities that benefited three different organizations but amounted to less than one hour of CD service per branch per year.

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

Performance under the Service Test in the Kingston and Poughkeepsie-Newburgh-Middletown MSAs is weaker than the bank's overall **Low Satisfactory** performance in New York. Performance in limited-scope areas did not influence the Service Test performance in New York.

Refer to Tables 1 - 15 in the New York section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of North Dakota Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending activities reflect excellent responsiveness to the credit needs of its full-scope North Dakota AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope North Dakota AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope North Dakota AAs..
- WFB's CD lending has a positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope North Dakota AAs.
- WFB's delivery systems are accessible to limited portions of its full-scope North Dakota AAs.
- To the extent changes have been made, WFB's opening and closing of branches has not adversely affected the accessibility of it delivery systems within its full-scope North Dakota AAs..

## Description of Institution's Operations in the State of North Dakota

Of the bank's 54 state and multistate rating areas, North Dakota ranks 42nd and accounts for 0.2 percent of total bank deposits, or \$1.3 billion as of June 30, 2012. WFB has 14 of the 53 total counties in the state. Within the state, WFB operates 15 branch offices. WFB is the largest banking institution in North Dakota with 9.2 percent of the deposit market share. Primary competitors include American Banking Center, and US Bank, NA with deposit market shares of 5.6 percent and 5.4 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of North Dakota

Of WFB's eight AAs in North Dakota, the Bismarck MSA and Minot Non-Metropolitan AA were selected for full-scope review. These AAs accounts for 61.2 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

WFB's Lending Test performance in North Dakota is rated **High Satisfactory**. Based on full-scope reviews, performance in the Minot Non-Metropolitan AA is excellent and in the Bismarck MSA is good.

### Conclusions for Areas Receiving Full-Scope Reviews

#### Lending Activity

The level of lending activity in North Dakota full-scope AAs is excellent.

The level of lending activity in the Bismarck MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to businesses, a good level of activity for small loans to farms, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share.

The level of lending activity in the Minot Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms.

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

Geographic distribution of loans in North Dakota full-scope AAs is good.

In the Bismarck MSA, the overall geographic distribution of loans is adequate. The distribution is poor for home purchase loans, adequate for home refinance loans and small loans to farms, good for home improvement loans, and excellent for small loans to businesses.

When we assessed performance in moderate-income geographies relative to the level of demand for the product as evidenced by industry wide applications in low- and moderate-income geographies in the AA, we determined that distribution of home refinance loans improved. The conclusion for home refinance loans and Bismarck geographic distribution remained the same. However, it improved the overall Bismarck

geographic distribution and improved the overall geographic distribution for North Dakota.

In the Minot Non-Metropolitan AA, the overall geographic distribution of loans is good. The distribution is excellent for home purchase loans and small loans to businesses and farms and good for home improvement and home refinance loans.

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

Distribution of loans by borrower income in North Dakota full-scope AAs is good.

In the Bismarck MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase loans and small loans to businesses and farms and adequate for home improvement and home refinance loans.

In the Minot Non-Metropolitan AA, the overall distribution of loans by borrower income is adequate. The distribution is good for home purchase loans and small loans to businesses, adequate for home improvement and home refinance loans, and poor for small loans to farms.

### **CD Lending**

The volume and nature of the bank's CD lending had a positive effect on performance in North Dakota full-scope AAs.

WFB did not originate or purchase any CD loans in the Bismarck MSA during the evaluation period.

WFB's CD loans had a significantly positive effect on performance in the Minot Non-Metropolitan AA. WFB originated \$4.7 million in CD loans equal to 16.4 percent of allocated Tier 1 Capital.

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

Performance under the Lending Test in the Bowman County, Dickinson, Jamestown, Northeastern North Dakota, and Trail County Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in North Dakota. Performance under the Lending Test in Wahpeton Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in North Dakota. Performance in these limited-scope assessment areas did not influence the Lending Test performance in North Dakota.

## INVESTMENT TEST

WFB's Investment Test performance in North Dakota is rated **Outstanding**. Based on full-scope reviews, performance is excellent in the Bismarck MSA and Minot Non-Metropolitan AA.

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's grant and investment volume in the Bismarck MSA is excellent. During the evaluation period, WFB made 14 grants and investments in the AA totaling \$2.8 million or 4.4 percent of allocated Tier 1 Capital. In addition, six prior period grants and investments totaling \$3.8 or 5.3 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need for affordable housing primarily through investments in Fannie Mae mortgage-backed securities.

WFB's grant and investment volume in the Minot Non-Metropolitan AA is excellent. During the evaluation period, WFB made four grants and investments in the AA totaling \$2.2 million or 7.6 percent of allocated Tier 1 Capital. In addition, five prior period grants and investments totaling \$609,000 or 0.9 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated a good level of responsiveness to the need for affordable housing identified in the AA.

Highlights of WFB's grants and investments that benefited the North Dakota full-scope AAs include the following:

- In February 2012, WFB invested \$2.2 million in the Minot Place Townhomes located in Minot, North Dakota. This investment was part of a \$15 million investment in a low-income housing tax credit fund.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Jamestown Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in North Dakota. Performance under the Investment Test in the Bowman County, Dickinson, Northeastern North Dakota, Trail County, and Wahpeton Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in North Dakota.

Performance in limited-scope areas did not influence the Investment Test performance in North Dakota.

## **SERVICE TEST**

WFB's Service Test performance in North Dakota is rated **Low Satisfactory**. Based on full-scope reviews, performance is poor in the Bismarck MSA and good in the Minot Non-Metropolitan.

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

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

WFB's distribution of branches in North Dakota full-scope AAs is poor.

In the Bismarck MSA, WFB's distribution of branches is very poor. Delivery systems are inaccessible to significant portions of the MSA.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. Distribution of branches in moderate-income geographies is very poor. There are no branches in moderate-income geographies.

In the Minot Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the AA.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

##### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in North Dakota full-scope AAs did not affect the branch distribution in a negative or positive way.

WFB did not open or close any branches in the Bismarck MSA and Minot Non-Metropolitan AA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours vary in a way that inconveniences portions of North Dakota full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB does not have branches in low- or moderate-income geographies in the Bismarck MSA. Nearly 12,000 persons live in low- and moderate-income geographies in the MSA. WFB's branch operating hours are poor and vary in a way that inconveniences portions of the

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Minot Non-Metropolitan AA, particularly low- and moderate-income geographies and individuals. Fifty percent of branches located in low- and moderate-income geographies, maintained Saturday hours, compared to 50 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an excellent level of CD services in North Dakota full-scope AAs.

In the Bismarck MSA, WFB is a leader in providing CD services. WFB employees provided a total of 278 hours of CD services. These hours represented 33 CD service activities that benefited 10 different organizations and amounted to slightly more than 16 hours of CD service per branch per year.

In the Minot Non-Metropolitan AA, WFB provides an adequate level of CD services. WFB employees provided a total of 19 hours of CD services. These hours represented 10 different CD service activities that benefited three different organizations and amounted to just over one hour of CD service per branch per year. We considered the limited opportunities for CD services in our evaluation.

Highlights of WFB's CD services that benefited North Dakota include the following:

- A WFB employee provides financial expertise and reviews housing applications for a nonprofit organization with the mission of providing affordable housing and development opportunities to revitalize communities and improve the standard of living and quality of life for North Dakotans.
- A WFB employee provides financial expertise to the board of directors of a local economic development association with a small business focus.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in Bowman County, Dickinson, Jamestown, Northeastern Trail County, and Wahpeton Non-Metropolitan AAs is stronger than the bank's overall **Low Satisfactory** performance in North Dakota. Performance in limited-scope areas did not influence the Service Test performance in North Dakota.

Refer to Tables 1 - 15 in the North Dakota section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Ohio Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>Low Satisfactory</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Ohio AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Ohio AA.
- The distribution of WFB's borrowers reflects excellent penetration among borrowers of different income levels and businesses of different sizes within its full-scope Ohio AA.
- WFB has an adequate level of qualified CD investments and grants within its full-scope Ohio AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its full-scope Ohio AA.

## Description of Institution's Operations in the State of Ohio

Of the bank's 54 state and multistate rating areas, Ohio ranks fifty-third and accounts for 0.01 percent of total bank deposits, or \$70 million as of June 30, 2012. WFB has two defined AAs in Ohio, which include six of the 88 counties in Ohio. Within the state, WFB operates two branch offices. WFB is the 176th largest banking institution in Ohio with 0.03 percent of the deposit market share. However, in Van Wert County where WFB has its only full service branch in Ohio, WFB is the fourth largest bank with 14.13 of the deposit market share.

Primary competitors in Van Wert County include Van Wert Federal Savings Bank and First Federal Savings and Loan Association of Van Wert with deposit market shares of 21.2 percent and 20.5 percent, respectively. In the Cleveland-Elyria MSA, WFB operates a private banking office that is licensed as a branch and therefore included in the bank's performance evaluation. The branch does not accept deposits from the public and consequently has no Tier 1 Capital allocated to it.

We considered performance context factors in our evaluation of CD investments and geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## LENDING TEST

WFB's Lending Test performance in Ohio is rated **High Satisfactory**. Based on a full-scope review, performance in the Van Wert Non-Metropolitan AA is good.

### Conclusions for Areas Receiving Full-Scope Reviews

#### Lending Activity

The level of lending activity in the Ohio full-scope AA is excellent. The level of lending activity in Van Wert Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase loans, home refinance loans, and small loans to businesses and farms in relation to WFB's deposit market share. However, the level of activity was poor for home improvement loans in relation to WFB's deposit market share.

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

Geographic distribution of loans in the Ohio full-scope AA is good.

In the Van Wert Non-Metropolitan AA, the overall geographic distribution of loans is good. The distribution was excellent for home purchase loans, good for home improvement loans and small loans to businesses, poor for home refinance loans, and very poor for small loans to farms.

When we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA and credit demand as indicated by HMDA applications,, we determined that distribution of home refinance loans improved. Although the conclusion for home refinance loans remained the same, it improved the overall Van Wert Non-Metropolitan AA geographic distribution and improved the overall geographic distribution for Ohio.

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

Distribution of loans by borrower income in the Ohio full-scope AA is excellent. In the Van Wert Non-Metropolitan AA, the overall distribution of loans by borrower income is excellent. The distribution is excellent for home purchase loans and small loans to businesses, good for home improvement and home refinance loans, and poor for small loans to farms.

When we assessed lending in low- and/or moderate-income geographies relative to severe economic conditions affecting the AA and credit demand as indicated by HMDA applications,, we determined that distribution of home refinance loans improved. Although the conclusion for home refinance loans remained the same, it improved the

overall Van Wert Non-Metropolitan AA borrower distribution and improved the overall borrower distribution for Ohio.

## **CD Lending**

WFB did not originate any CD loans in the Ohio full-scope AA or statewide.

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

Performance under the Lending Test in the Cleveland-Elyria-Mentor MSA was not inconsistent with the bank's overall **High Satisfactory** performance in Ohio. Performance in the limited-scope assessment area did not influence the Lending Test performance in Ohio.

## **INVESTMENT TEST**

WFB's Investment Test performance in Ohio is rated **Low Satisfactory**. Based on a full-scope review, performance in the Van Wert Non-Metropolitan AA is very poor.

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

WFB's grant and investment volume in the Van Wert Non-Metropolitan AA is adequate.

During the evaluation period, WFB made two grants in the AA totaling \$1,400 or 0.02 percent of allocated Tier 1 Capital. In addition to the investments and grants made in the AA, WFB has one ongoing qualified investment that originated in a prior period. The investment totals \$2.6 million or 33 percent of allocated Tier 1 Capital and provides continuing benefit to the entire state including the AA.

We considered the limited opportunities for investment in the Van Wert Non-Metropolitan AA in our assessment of investment test performance.

Highlights of WFB's grants and investments that benefited the Ohio full-scope AA include:

- In December 2007, WFB invested \$5 million in the Ohio Equity Fund for Housing XVII, sponsored by the Ohio Capital Corporation for Housing. This organization provides funding for affordable housing projects located throughout the state of Ohio. WFB's investment was used to help provide for construction or rehabilitation of over 2,000 units of affordable housing for low- and moderate-income residents.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Cleveland-Elyria-Mentor MSA was not inconsistent with the bank's overall **Low Satisfactory** performance in Ohio.

## SERVICE TEST

WFB's Service Test performance in Ohio is rated **Low Satisfactory**. Based on a full-scope review, performance in the Van Wert Non-Metropolitan AA is adequate.

## Conclusions for Areas Receiving Full-Scope Reviews

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in the Ohio full-scope AA is adequate.

In the Van Wert Non-Metropolitan AA, WFB's distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of the AA. WFB has only one branch in the AA, which is located in a middle-income geography. The AA has no low-income geographies and the moderate-income geographies comprise 12.4 percent of the area's population. An important contextual issue is the geographic size of Van Wert County. The branch is located in the city of Van Wert, which is centrally located within the county. This branch is within two miles of the AA's only moderate-income geography.

#### *Changes in Branch Location*

There were no branch openings or closings in the Ohio full-scope AA.

#### *Reasonableness of Business Hours and Services*

WFB's branch hours and services do not vary in a way that inconveniences portions of the Ohio full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours do not vary in a way that inconveniences portions of the Van Wert Non-Metropolitan AA. See the discussion under the Accessibility of Delivery Systems section for contextual information regarding the location of WFB's branch.

## CD Services

WFB provided a limited level of CD services in the Ohio full-scope AA.

In the Van Wert Non-Metropolitan AA, WFB provides a limited level of CD services. WFB employees provided a total of one hour of CD services. This amounted to less than a half hour of CD service per year during the evaluation period. We considered the limited CD opportunities in the AA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in Cleveland-Elyria-Mentor MSA was weaker than the bank's overall **Low Satisfactory** performance in Ohio. Performance in limited-scope areas influenced the Service Test performance in Ohio.

Refer to Tables 1 - 15 in the Ohio section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Oregon Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Oregon AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Oregon AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Oregon AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Oregon AAs.
- WFB's delivery systems are reasonably accessible to essentially all portions of its full-scope Oregon AAs.

## Description of Institution's Operations in the State of Oregon

Of the bank's 54 state and multistate rating areas, Oregon ranks 32nd and accounts for 0.40 percent of total bank deposits, or \$3.4 billion as of June 30, 2012. WFB has nine defined AAs in Oregon, which include 23 out of 36 total counties in the state. Within the state, WFB operates 60 branches. WFB is the second largest banking institution in Oregon with 13.7 percent of the deposit market share. Primary competitors include US Bank, NA and Umpqua Bank, with deposit market shares of 15.5 percent and 13.5 percent, respectively.

CD lending and investment opportunities state-wide in Oregon were constrained by the downturn in the economy. The nonprofit organizations that are the developers on most CD projects throughout the state suffered significant financial hardship when anticipated revenue from federal, state, and local entities was cut back as a result of falling tax revenues. Without the money to cover basic expenses and predevelopment costs, these organizations were unable to create viable lending and investment opportunities at prerecession levels. Although most states were faced with budget shortfalls, the situation was particularly severe in Oregon.

In addition, we considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## **Scope of Evaluation in the State of Oregon**

Of WFB's nine AAs in Oregon, the Eugene-Springfield and Salem MSAs and Southwestern Oregon Non-Metropolitan AA were selected for full-scope review. These AAs account for 53.0 percent of the bank's state deposits and are the most significant AAs in the state.

## **LENDING TEST**

WFB's Lending Test performance in Oregon is rated **Outstanding**. Based on full-scope reviews, performance in the Eugene-Springfield and Salem MSAs and the Southwestern Oregon Non-Metropolitan AA is excellent.

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

### **Lending Activity**

The level of lending activity in Oregon full-scope AAs is excellent.

The level of lending activity in Eugene-Springfield MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and a good level of activity for small loans to farms in relation to WFB's deposit market share.

The level of lending activity in Salem MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

The level of lending activity in Southwestern Oregon Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in Oregon full-scope AAs is good.

In the Eugene-Springfield MSA, the overall geographic distribution of loans is good. The distribution is excellent for home purchase loans and small loans to businesses,

good for home refinance loans, poor for home improvement loans, and very poor for small loans to farms.

In the Salem MSA, the overall geographic distribution of loans is good. The distribution is excellent for home purchase loans, good for home improvement and home refinance loans and small loans to businesses, and very poor for small loans to farms.

In the Southwestern Oregon Non-Metropolitan AA, the overall geographic distribution of loans is excellent. The distribution is excellent for home purchase and home improvement loans and small loans to businesses and farms and good for home refinance loans.

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

Distribution of loans by borrower income in Oregon full-scope AAs is good.

In the Eugene-Springfield MSA, the overall distribution of loans by borrower income is good. We initially concluded that the distribution was excellent for small loans to businesses, good for home purchase and home improvement loans and small loans to farms, and adequate for home refinance loans.

However, when we assessed lending to low- and/or moderate-income borrowers relative to severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved for home purchase and refinance loans. Although our conclusion remained the same for home purchase loans, distribution of refinance loans is now considered good.

In the Salem MSA, the overall distribution of loans by borrower income is good. The distribution is excellent for small loans to businesses, good for home purchase and home improvement loans and small loans to farms, and adequate for home refinance loans.

When we assessed lending to low- and/or moderate-income borrowers relative to severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved for home purchase and refinance loans. However, our conclusion remained the same for home purchase loans and refinance loans.

In the Southwestern Oregon Non-Metropolitan AA, the overall distribution of loans by borrower income is good. The distribution was excellent for small loans to businesses, good for home purchase loans and small loans to farms, and adequate for home improvement and home refinance loans.

When we assessed lending to low- and/or moderate-income borrowers relative to moderately severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved for home purchase and refinance loans. Although our conclusion remained the same for home purchase and refinance loans, overall borrower distribution in the AA improved.

## CD Lending

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Oregon full-scope AAs. In addition, when we considered performance context factors that limited opportunities for CD lending, we determined the level of CD lending was sufficient to have a significantly positive effect on lending performance overall.

WFB's CD loans had a significantly positive effect on performance in the Eugene-Springfield MSA. WFB originated \$7.8 million in CD loans equal to 10.3 percent of allocated Tier 1 Capital. Eighty percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

WFB's CD loans had a positive effect on performance in the Salem MSA. WFB originated \$4.3 million in CD loans equal to 5.2 percent of allocated Tier 1 Capital.

WFB's CD loans had a significantly positive effect on performance in the Southwestern Oregon Non-Metropolitan AA. WFB originated \$12 million in CD loans equal to 27.9 percent of allocated Tier 1 Capital. Seventy-one percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Oregon full-scope AAs include the following:

- In June 2011, WFB provided a \$6.4 million loan for the construction of a 56-unit LIHTC affordable housing development in Eugene, Oregon. This limited partnership is an affiliate of a nonprofit Community Housing Development Organization whose mission is to improve the quality of life for people living on limited incomes. They are currently the leader in providing affordable housing options for low-income Oregonians.
- In November 2009, WFB provided a \$5 million loan for the purpose of funding the construction of a 36-unit LIHTC affordable housing complex located in a moderate-income census tract in Klamath Falls, Oregon. This limited liability company is an

affiliate of an organization that specializes in affordable housing consulting and development.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Bend and Medford MSAs and Coastal Oregon and Eastern Oregon Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Oregon. Performance under the Lending Test in Corvallis MSA and the Northern Oregon Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Oregon. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Oregon.

## INVESTMENT TEST

WFB's Investment Test performance in Oregon is rated **Outstanding**, performance in the Eugene-Springfield and Salem MSA and Southwestern Oregon Non-Metropolitan AA is excellent.

## Conclusions for Areas Receiving Full-Scope Reviews

WFB's grant and investment volume in the Eugene-Springfield MSA is excellent. During the evaluation period, WFB made 23 grants and investments in the AA totaling \$8.7 million or 11.5 percent of allocated Tier 1 Capital. In addition, four prior period grants and investments totaling \$1.4 million or 1.8 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing identified in the AA.

WFB's grant and investment volume in the Salem MSA is excellent. During the evaluation period, WFB made 16 grants and investments in the AA totaling \$15.4 million or 18.6 percent of allocated Tier 1 Capital. In addition, five prior period grants and investments totaling \$2.5 million or 3.0 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing and neighborhood revitalization identified in the AA.

WFB's grant and investment volume in the Southwestern Oregon Non-Metropolitan AA is excellent. During the evaluation period, WFB made nine grants and investments in

the AA totaling \$15.9 million or 36.9 percent of allocated Tier 1 Capital. In addition, 10 prior period grants and investments totaling \$4.9 million or 11.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

WFB's grants and investments demonstrated an excellent level of responsiveness to the need for affordable housing and neighborhood revitalization and stabilization identified in the AA.

Highlights of WFB's grants and investments that benefited Oregon include the following:

- In April 2012, WFB invested \$250,000 through an EQ2 in Saint Vincent De Paul of Lane County, a nonprofit multifamily developer located in Eugene, Oregon. The funds were used for predevelopment working capital associated with the acquisition, rehabilitation, and new construction of rental apartments for low- and moderate-income families, elderly, and physically/developmentally disabled persons in Lane County, Oregon.
- In February 2009, WFB invested \$200,000 through a NMTC in the Farmworker Housing Development Corporation. WFB's investment was used for general predevelopment of affordable housing projects.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Medford MSA and Eastern Oregon and Northern Oregon Non-Metropolitan AAs is not inconsistent with the bank's overall **Outstanding** performance in Oregon. Performance under the Investment Test in Bend and Corvallis MSAs and the Coastal Oregon Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Oregon. Performance in limited-scope areas did not influence the Investment Test performance in Oregon.

## SERVICE TEST

WFB's Service Test performance in Oregon is rated **High Satisfactory**. Based on full-scope reviews, performance in the Eugene-Springfield and Salem MSAs is good and in the Southwestern Oregon Non-Metropolitan AA is adequate.

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

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Oregon full-scope AAs is excellent.

In the Eugene-Springfield MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Salem MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the MSA.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

When giving consideration to one branch location that is in close proximity to a moderate-income geography, accessibility improves in moderate-income geographies.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Southwestern Oregon Non-Metropolitan AA, WFB's distribution of branches is good. Delivery systems are accessible to essentially all portions of the AA.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

There were no branches in moderate-income geographies and distribution was very poor. However, when giving consideration to one branch location that is in close

proximity to a moderate-income geography, accessibility improves in moderate-income geographies and is poor.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in Oregon full-scope AAs did not affect the branch distribution in a negative or positive way

WFB did not open or close any branches in the Eugene-Springfield MSA and Southwestern Oregon Non-Metropolitan AA during the evaluation period.

WFB's record of opening and closing branches in the Salem MSA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the assessment area resulting in a net loss of one branch in a middle-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences certain portions of full-scope AAs in Oregon, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Eugene-Springfield MSA, particularly low- and moderate-income geographies and individuals in low- and moderate-income geographies. One hundred percent of branches located in those geographies maintained Saturday hours, compared to 100 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Salem MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 100 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portion of Eugene-Springfield MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 80 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided a very poor level of CD services in Oregon full-scope AAs.

In the Eugene-Springfield MSA, WFB provided few CD services. WFB employees provided a total of 16 hours of CD services. These hours represented four CD services activities that benefited three different organizations, but amounted to less than a half hour of CD services per branch per year.

In the Salem MSA, WFB provided few CD services. WFB employees provided a total of 27 hours of CD services. These hours represented eight different CD service activities that benefited six different organizations, but amounted to less than a half hour of CD services per branch per year.

In the Southwestern Oregon Non-Metropolitan AA, WFB provided few CD services. WFB employees provided a total of two hours of CD services. These hours represented one CD service activity that benefited one organization.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Bend and Medford MSAs and the Eastern Oregon and Northern Oregon Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Oregon. Performance under the Service Test in Coastal Oregon Non-Metropolitan AA and Corvallis MSA is weaker than the bank's overall **High Satisfactory** performance in Oregon. Performance in limited-scope areas did not influence the Service Test performance in Oregon.

Refer to Tables 1 - 15 in the Oregon section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of South Carolina Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>High Satisfactory</b>
<b>The Service Test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope South Carolina AAs.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope South Carolina AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope South Carolina AAs.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has a good level of qualified CD investments and grants in its full-scope South Carolina AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope South Carolina AAs.
- WFB provided a limited level of CD services in its full-scope South Carolina AAs.
- WFB's business hours do not vary in a way that inconveniences portions of its full-scope South Carolina AAs.

## Description of Institution's Operations in the State of South Carolina

Of the bank's 54 state and multistate rating areas, South Carolina ranks 18<sup>th</sup> and accounts for 1.4 percent of total bank deposits, or \$11.5 billion as of June 30, 2012. WFB has 12 defined AAs in South Carolina, which includes 37 out of 46 counties and MSAs in the state. Within the state, WFB operates 132 branches. WFB is the largest banking institution in South Carolina with 18.1 percent of the deposit market share. Primary competitors include Bank of America, and Branch Banking and Trust Company, with deposit market shares of 13.5 percent and 10.0 percent, respectively.

Because WFB's branches in South Carolina have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services. We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of South Carolina

Of WFB's 12 AAs in South Carolina, the Charleston-North Charleston-Summerville, Columbia, and Greenville-Mauldin-Easley MSAs were selected for full-scope review. These AAs account for 69.5 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in South Carolina is rated **High Satisfactory**. Based on full-scope reviews, performance in the Charleston-North Charleston-Summerville and Greenville-Mauldin-Easley MSAs is adequate and in the Columbia MSA is good.

### Lending Activity

The level of lending activity in South Carolina full-scope AAs is excellent.

The level of lending activity in the Charleston-North Charleston-Summerville MSA is excellent, and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to farms, a good level of activity for small loans to businesses, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share percentage or ranking. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

The level of lending activity in the Columbia MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans, and an adequate level of activity for small loans to businesses and farms in relation to WFB's deposit market share percentage or ranking.

The level of lending activity in Greenville-Mauldin-Easley MSA is excellent and is supported by an excellent level of activity for home purchase and home refinance loans and small loans to farms, a good level of activity for small loans to businesses, and an adequate level of activity for home improvement loans in relation to WFB's deposit market share percentage or ranking. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

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

Geographic distribution of loans in South Carolina full-scope AAs is adequate.

In the Charleston-North Charleston-Summerville MSA, the overall geographic distribution of loans is adequate. We initially concluded that the distribution was poor for home purchase, home improvement, and refinance loans, excellent for small loans to farms, and good for small loans to businesses.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans is adequate.

In the Columbia MSA, the overall geographic distribution of loans is adequate. We initially concluded that the distribution was poor for home purchase and refinance loans, excellent for small loans to farms, and good for home improvement and small loans to businesses.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications in the AA, performance improved and distribution of home purchase loans was adequate.

In the Greenville-Mauldin-Easley MSA, the overall geographic distribution of loans is adequate. We initially concluded that the distribution was adequate for home purchase and home improvement loans, excellent for small loans to businesses and small loans to farms, and poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA and credit demand as indicated by HMDA applications, performance improved and distribution of home purchase loans was good. In addition, the overall geographic distribution of loans in the Greenville-Mauldin-Easley MSA was revised and is now adequate.

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

Distribution of loans by borrower income in South Carolina full-scope AAs is good.

In the Charleston-North Charleston-Summerville MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase, home improvement, and small loans to businesses, excellent for small loans to farms, and adequate for refinance loans.

In the Columbia MSA, the overall distribution of loans by borrower income is good. The distribution is good for home improvement, refinance, and small loans to businesses, and excellent for home purchase and small loans to farms.

In the Greenville-Mauldin-Easley MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase, home improvement, and small loans to businesses, excellent for small loans to farms, and adequate for refinance loans.

## **CD Lending**

The volume and nature of the bank's CD lending had a neutral effect on performance in South Carolina full scope-AAs.

WFB's CD loans had a neutral effect on performance in the Charleston-North Charleston-Summerville MSA. During the evaluation period, WFB originated \$6.0 million in CD loans equal to 2.5 percent of allocated Tier 1 Capital. Thirty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

WFB's CD loans had a neutral effect on performance in the Columbia MSA. During the evaluation period, WFB originated \$1.5 million in CD loans equal to 0.32 percent of allocated Tier 1 Capital. One hundred percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

WFB's CD loans had a neutral effect on performance in the Greenville-Mauldin-Easley MSA. During the evaluation period, WFB originated \$7.5 million in CD loans equal to 3.8 percent of allocated Tier 1 Capital.

Highlights of WFB's CD lending that benefited South Carolina full-scope AAs include the following:

- WFB, through the renewal of a revolving line of credit, provided the working capital needed by an affordable housing organization to fund their goal of providing financing for the production and preservation of affordable housing.
- Support was provided to an economic development organization, through the bank's renewal of a line of credit, which provides financing to small businesses throughout South Carolina

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Anderson, Florence, and Spartanburg MSAs and Oconee County, Northwestern South Carolina, and Southern South Carolina Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in South Carolina. Performance under the Lending Test in the Myrtle Beach-North Myrtle Beach-Conway and Sumter MSAs and Northeastern South Carolina Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in South Carolina. Performance in these limited-scope assessment areas did not influence the Lending Test performance in South Carolina.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in South Carolina is rated **High Satisfactory**. Based on full-scope reviews, performance in the Greenville-Mauldin-Easley MSA is excellent and in the Charleston-North Charleston-Summerville and Columbia MSAs is adequate.

WFB's grant and investment volume in the Charleston-North Charleston-Summerville MSA is adequate. During the evaluation period, WFB made 57 grants and investments in the AA totaling \$5.1 million or 2.2 percent of allocated Tier 1 Capital. In addition, four prior period grants and investments totaling \$3.3 million or 1.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. Our conclusions considered the shortened evaluation period for this AA.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need identified in the AA for affordable housing.

WFB's grant and investment volume in the Columbia MSA is adequate. During the evaluation period, WFB made 52 grants and investments in the AA totaling \$9.8 million or 2.1 percent of allocated Tier 1 Capital. In addition, four prior period grants and investments totaling \$6.1 million or 1.3 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the needs identified in the AA for affordable housing and economic development. Affordable housing needs were met primarily through investments in mortgage-backed securities.

WFB's grant and investment volume in the Greenville-Mauldin-Easley MSA is excellent. During the evaluation period, WFB made 34 current period investments and grants in the AA totaling \$2.9 million or 1.5 percent of allocated Tier 1 Capital. In addition, eight prior period grants and investments totaling \$17.8 million or 9.1 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the need identified in the AA for affordable housing.

Highlights of WFB's grants and investments that benefited South Carolina full-scope AAs include the following:

- WFB provided investment funds to an affordable housing organization to help finance the organization's loan pool, which is used to provide financing for affordable housing developments through the assessment area.
- Though an investment, WFB provided funds to an affordable housing organization that were used to fund the predevelopment expenses associated with rental housing developments offered to families earning less than 80 percent of the assessment area's median income.
- WFB invested in an affordable housing organization's multi-family housing project that helped in the creation or preservation of approximately 3,000 affordable housing units in the Columbia MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in the Spartanburg MSA and Northeastern and Southern South Carolina Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in South Carolina. Performance under the Investment Test in Anderson, Florence, Myrtle Beach-North Myrtle Beach-Conway, and Sumter MSAs and Northwestern South Carolina and Oconee County Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in South Carolina. Performance in limited-scope areas did not influence the Investment Test performance in South Carolina.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in South Carolina is rated **High Satisfactory**. Based on full-scope reviews, performance in the Charleston-North Charleston-Summerville, Columbia, and Greenville-Mauldin-Easley MSA is good.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in South Carolina full-scope AAs is excellent. In the Charleston-North Charleston-Summerville MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the institution's assessment area.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies. However, when considering three moderate-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Columbia MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the institution's assessment area.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is good. WFB did not have branches in low-income census tracts, and these census tracts represented less than five percent of the total population in the assessment area, therefore our evaluation was weighted toward performance in the moderate-income census tracts. However, when considering six moderate-income branch locations that are in close proximity to moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Greenville-Mauldin-Easley MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the institution's assessment area.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies is near to the percentage of the population residing in these geographies and is good. However, when considering one low-income and three moderate-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in moderate-income geographies and is excellent.

WFB's ATM network offers a good alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in South Carolina full-scope AAs did not affect the branch distribution in a negative or positive way. WFB did not open or close any branches in the Charleston-North Charleston-Summerville, Columbia, or Greenville-Mauldin-Easley MSAs during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of South Carolina full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Charleston-North Charleston-Summerville MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 50 percent of branches located in those geographies maintained Saturday hours, compared to 28 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Columbia MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 33 percent of

branches located in those geographies maintained Saturday hours, compared to 50 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Greenville-Mauldin-Easley MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 50 percent of branches located in those geographies maintained Saturday hours, compared to 39 percent of branches located in middle- and upper-income geographies.

## CD Services

WFB provided a poor level of CD services in South Carolina full-scope AAs. In the Charleston-North Charleston-Summerville MSA, WFB provides a poor level of CD services. WFB employees provided a total of 95 hours of CD services. These hours represented 29 CD service activities that benefited 21 different organizations and amounted to less slightly less than one and a half hours of CD service per branch per year. Three services were considered highly responsive to identified community needs.

In the Columbia MSA, WFB provides an adequate level of CD services. WFB employees provided a total of 178 hours of CD services. These hours represented 60 CD service activities that benefited 22 different organizations and amounted to slightly less than two and a half hours of CD service per branch per year.

In the Greenville-Mauldin-Easley MSA, WFB provides few CD services. WFB employees provided a total of 22 hours of CD services. These hours represented 12 CD services activities that benefited nine different organizations, but amounted to less than a half hour of CD services per branch per year.

Highlights of WFB's CD services that benefited South Carolina include the following:

- A WFB employee serves on the board of a community services organization that raises and pools capital from public and private investments to create a revolving loan fund that finances critically needed CD projects in the Charleston-North Charleston-Summerville MSA.
- As a board member and treasurer, a WFB employee provides financial assistance to an affordable housing organization that works to create and preserve quality, affordable housing in the Columbia MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Myrtle Beach-North Myrtle Beach-Conway MSA and Northwestern South Carolina and Oconee County AAs is not inconsistent with the bank's overall **High Satisfactory** performance in South Carolina. Performance

under the Service Test in the Anderson, Florence, Spartanburg, and Sumter MSAs and Northeastern South Carolina Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in South Carolina. Performance under the Service Test in the Southern South Carolina Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in South Carolina. Performance in limited-scope areas did not influence the Service Test performance in South Carolina.

Refer to Tables 1 - 15 in the South Carolina section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of South Dakota Rating

### **CRA rating for the state: 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 the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope South Dakota AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope South Dakota AAs.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its full-scope South Dakota AAs.
- WFB's CD lending has a neutral effect on Lending Test performance.
- WFB has good level of qualified CD investments and grants within its full-scope South Dakota AAs.
- WFB's delivery systems are readily accessible to all portions of its full-scope South Dakota AAs.
- WFB's branch hours do not vary in a way that inconveniences portions of its full-scope South Dakota AAs, particularly low- and moderate-income geographies and individuals.

### **Description of Institution's Operations in the State of South Dakota**

Of the bank's 54 state and multistate rating areas, South Dakota ranks third and accounts for 8.8 percent of total bank deposits, or \$74.4 billion as of June 30, 2012. WFB has seven defined AAs in South Dakota, which include 37 of the 66 counties in the state.

Within the state, WFB operates 47 branch offices. WFB is the second largest banking institution in South Dakota with 23.6 percent of the deposit market share. Citibank, NA has the largest deposit market share with 70.4 percent of deposits reported in the state. However, both Citibank and WFB are headquartered in South Dakota, and a significant amount of their deposits do not originate from within the state. It is estimated that 96 percent of the deposits attributed to WFB in South Dakota do not originate from the state.

We have taken the significant level of unaffiliated deposits into consideration when assessing the performance of WFB within South Dakota and in assessing the contribution of the state rating to the overall bank rating. Without the unaffiliated

deposits, we estimate that South Dakota would be the twenty-eighth largest of WFB's 54 rating areas. Primary competitors with actual banking operations include Great Western Bank and Dakota Bank with deposit market shares of 0.5 percent and 0.4 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

### **Scope of Evaluation in the State of South Dakota**

Of WFB's seven AAs in South Dakota, the Sioux Falls MSA and Greater South Dakota Non-Metropolitan AA were selected for full-scope review. These AAs accounts for 80.3 percent of the bank's state deposits and are the most significant AAs in the state.

## **LENDING TEST**

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

WFB's Lending Test performance in South Dakota is rated **High Satisfactory**. Based on full-scope reviews, performance in the Sioux Falls MSA and Greater South Dakota Non-Metropolitan AA is good.

### **Lending Activity**

The level of lending activity in South Dakota full-scope AAs is excellent. The level of lending activity in Greater South Dakota Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase loans, home refinance loans, and small loans to businesses and farms and a good level of activity for home improvement loans in relation to WFB's deposit market share.

The level of lending activity in the Sioux Falls MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share.

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

Geographic distribution of loans in South Dakota full-scope AAs is good.

In the Greater South Dakota Non-Metropolitan AA, the overall geographic distribution of loans is good. We initially concluded that the distribution was adequate for home

purchase and home improvement loans and small loans to businesses and farms and poor for refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of refinance loans should be considered good.

In the Sioux Falls MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was poor for home purchase, home improvement and home refinance loans and excellent for small loans to businesses and farms.

However, when we assessed lending in low- and/or moderate-income geographies relative to the credit demand as indicated by HMDA applications and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and home refinance loans is considered adequate.

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

Distribution of loans by borrower income in South Dakota full-scope AAs is good.

In the Greater South Dakota Non-Metropolitan AA, the overall distribution of loans by borrower income is adequate. The distribution is good for home purchase loans, adequate for home improvement loans, and poor for home refinance loans.

In the Sioux Falls MSA, the overall distribution of loans by borrower income is good. The distribution is excellent for home purchase loans, good for home improvement loans, and adequate for home refinance loans.

### **CD Lending**

The volume and nature of the bank's CD lending had a neutral effect on performance in South Dakota full-scope AAs.

WFB's \$4.3 million in CD loans had a neutral effect on performance in the Greater South Dakota Non-Metropolitan AA. Seventeen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

WFB's \$7.5 million in CD loans had a neutral effect on performance in the Sioux Falls MSA. Seventy percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited South Dakota full-scope AAs include the following:

- In November 2012, WFB provided a \$2.8 million loan for the purpose of acquiring and rehabilitating a 50-unit senior LIHTC affordable housing complex located in Watertown, South Dakota. This limited liability company is acquiring and rehabilitating a 50-unit senior affordable housing complex in Watertown, South Dakota. The complex is currently encumbered by a Section 8 HAP contract and the sponsor is seeking LIHTC financing.
- In September 2009, WFB provided a \$2.5 million loan for the purpose of providing construction financing for a 64-unit LIHTC affordable housing development located in Sioux Falls, South Dakota. This limited partnership is an affiliate of an organization that is the most experienced developer of LIHTC housing in the state.

### Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Mitchell, Western South Dakota, and Yankton-Vermillion Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in South Dakota. Performance under the Lending Test in the Rapid City MSA and Fall River County Non-Metropolitan AAs is weaker than with the bank's overall **High Satisfactory** performance in South Dakota. Performance in these limited-scope assessment areas did not influence the Lending Test performance in South Dakota.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in South Dakota is rated **High Satisfactory**. Based on full-scope reviews, performance in the Greater South Dakota Non-Metropolitan AA is excellent and in the Sioux Falls MSA is adequate.

WFB's grant and investment volume in the Greater South Dakota Non-Metropolitan AA is excellent. During the evaluation period, WFB made 25 grants and investments in the AA totaling \$8.4 million or 6.2 percent of allocated Tier 1 Capital. In addition, five prior period grants and investments totaling \$2.5 million or 1.5 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated a good level of responsiveness to the need identified in the AA for affordable housing.

WFB's grant and investment volume in the Sioux Falls MSA is adequate. During the evaluation period, WFB made 45 grants and investments in the AA totaling \$6.2 million or 0.08 percent of allocated Tier 1 Capital. In addition, four prior period grants and investments totaling \$1.5 million or 0.02 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating.

Stating the level of investments as a percent of Tier 1 Capital allocated to the AA is somewhat misleading in the Sioux Falls MSA because Tier 1 Capital is allocated as a percentage of FDIC deposits associated with the AA. Because Sioux Falls is the headquarters for WFB, a significant volume of deposits are a result of corporate accounting and do not reflect consumer and commercial accounts in the Sioux Falls AA. Our assessment of investment performance considered the level of grants and investments relative to the WFB's operations serving the banking needs of the Sioux Falls MSA.

Highlights of WFB's grants and investments that benefited South Dakota full-scope AAs include the following:

- In July 2010, WFB invested \$250,000 in Northeast South Dakota Economic Corporation. The investment was used to provide loan capital for funding first mortgages and home rehabilitation loans. Northeast South Dakota Economic Corporation is a non-profit organization and CD Financial Institution based in Sisseton, South Dakota.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Yankton-Vermillion Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in South Dakota. Performance under the Investment Test in the Rapid City MSA and Fall River County, Mitchell, and Western South Dakota Non-Metropolitan AAs is weaker than the bank's overall **High Satisfactory** performance in South Dakota. Performance in limited-scope areas did not influence the Investment Test performance in South Dakota.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in South Dakota is rated **High Satisfactory**. Based on full-scope reviews, performance in the Greater South Dakota Non-Metropolitan AA and the Sioux Falls MSA is good.

## **Retail Banking Services**

### ***Accessibility of Delivery Systems***

WFB's distribution of branches in South Dakota full-scope AAs is excellent.

In the Greater South Dakota Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the AA.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

In the Sioux Falls MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the AA.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the Sioux Falls MSA.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in South Dakota full-scope AAs has not adversely affected the accessibility of its delivery systems.

WFB's record of opening and closing branch offices in the Greater South Dakota Non-Metropolitan AA is good. WFB has not adversely affected the accessibility of its delivery systems. During the evaluation period, WFB closed three branches throughout the assessment area resulting in a net loss of one branch in moderate-income geographies and two branches in middle-income geographies. However, distribution remained excellent after the branch closings.

WFB did not open or close any branches in the Sioux Falls MSA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences portions of South Dakota full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are poor and vary in a way that inconveniences portions of the Greater South Dakota Non-Metropolitan AA, particularly moderate-income geographies. No branches located in moderate-income geographies maintained Saturday hours, compared to 50 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Sioux Falls MSA, particularly low- and moderate-income geographies or individuals. Fifty percent of branches located in moderate-income geographies maintained Saturday hours, compared to 63 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an excellent level of CD services in South Dakota full-scope AAs.

In the Greater South Dakota Non-Metropolitan AA, WFB is a leader in providing CD services. WFB employees provided a total of 364 hours of CD services. These hours represented 26 CD service activities that benefited 15 different organizations and amounted to almost five hours of CD services per branch per year.

In the Sioux Falls MSA, WFB is a leader in providing CD services. WFB employees provided a total of 2,617 hours of CD services. These hours represented 694 different CD service activities that benefited 42 different organizations and amounted to almost 44 hours of CD service per branch per store.

Highlights of WFB's CD services that benefited the South Dakota full-scope AAs include the following:

- A WFB employee provides financial counseling to clients of an ecumenical non-profit organization that was founded by local clergy that saw a need to supplement the welfare programs of State and local entities. The purpose of the program is to fill in the gaps left by the public welfare systems. It serves about 4,000 people per year with three main services, the first being financial assistance, the second being information and referral and the third linking the faith community to those in need.
- WFB employees provide financial education classes to many CD qualified organizations throughout South Dakota.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Fall River County, Mitchell, and Yankton-Vermillion Non-Metropolitan AAs is not inconsistent with the bank's overall **High Satisfactory** performance in South Dakota. Performance under the Service Test in the Rapid City MSA is stronger than the bank's overall **High Satisfactory** performance in South Dakota. Performance under the Service Test in the Western South Dakota Non-Metropolitan AA is weaker than the bank's overall **High Satisfactory** performance in South Dakota. Performance in limited-scope areas did not influence the Service Test performance in South Dakota.

Refer to Tables 1 - 15 in the South Dakota section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Tennessee Rating

<b>CRA rating for the state:</b>	<b>Outstanding</b>
<b>The Lending Test is rated:</b>	<b>Outstanding</b>
<b>The Investment Test is rated:</b>	<b>Outstanding</b>
<b>The Service Test is rated:</b>	<b>Low Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its Tennessee AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its Tennessee AA.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its Tennessee AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its Tennessee AA.
- WFB's delivery systems are reasonably accessible to essentially all portions of its Tennessee AA.

## Description of Institution's Operations in the State of Tennessee

Of the bank's 54 state and multistate rating areas, Tennessee ranks 45 and accounts for 0.1 percent of total bank deposits, or \$882 million as of June 30, 2012. WFB has one defined AA in Tennessee, which includes 16 out of 95 total counties in the state. An additional three counties are part of WFB's Memphis AA. Performance for the multistate is evaluated and discussed in the section specific to the Multistate. Within the state, WFB operates 11 branch offices. WFB is the 15<sup>th</sup> largest banking institution in Tennessee with 0.9 percent of the deposit market share. Primary competitors include Regions Bank, and Sun Trust Bank, with deposit market shares of 14.3 percent and 9.8 percent, respectively.

Because WFB's branches in Tennessee have only been part of WFB since the merger of Wachovia's operations into WFB on March 20, 2010, the performance evaluation period for these AAs is shorter than the evaluation period for rating areas and AAs that were part of WFB prior to the last CRA performance evaluation. We considered the shorter evaluation period in our assessment of CD lending, investments and services.

## Scope of Evaluation in the State of Tennessee

The Nashville-Davidson-Murfreesboro-Franklin MSA was selected for full-scope review. The AA accounts for 100 percent of the bank's state deposits and is the only AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Tennessee is rated **Outstanding**. Based on a full-scope review, performance in the Nashville-Davidson-Murfreesboro-Franklin MSA is excellent.

### Lending Activity

The level of lending activity in the Tennessee full-scope AA is excellent. The level of lending activity in Nashville-Davidson-Murfreesboro-Franklin MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, refinance, and small loans to business and farms in relation to WFB's deposit market share.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Tennessee full-scope AA is adequate. In the Nashville-Davidson-Murfreesboro-Franklin MSA, the overall geographic distribution of loans is adequate. The distribution is adequate for home purchase loans, excellent for small loans to farms and small loans to businesses, and poor for home improvement and refinance loans.

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

Distribution of loans by borrower income in the Tennessee full-scope AA is good. In the Nashville-Davidson-Murfreesboro-Franklin MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase, home improvement and refinance loans, and excellent for small loans to businesses and small loans to farms.

### CD Lending

The volume and nature of the bank's CD lending had a significantly positive effect on performance in the Tennessee full-scope AA.

WFB originated \$34.7 million in CD loans equal to 34.9 percent of allocated Tier 1 Capital. WFB's CD loans had a significantly positive effect on Lending Test performance in the Nashville-Davidson-Murfreesboro-Franklin MSA. Thirty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Tennessee full-scope AA include the following:

- WFB provided a line of credit that was used by an affordable housing organization for the funding and renovation of acquired residential properties in the assessment area.
- The bank provided a loan to an affordable housing organization that was used to fund the construction of a 120-unit LIHTC affordable housing complex restricted to low- and moderate-income households.

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

There were no limited-scope assessment areas in Tennessee. The rating assigned is based on the full-scope Nashville-Davidson-Murfreesboro-Franklin MSA.

## **INVESTMENT TEST**

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

WFB's Investment Test performance in Tennessee is rated **Outstanding**. Based on a full-scope review, performance in the Nashville-Davidson-Murfreesboro-Franklin MSA is excellent.

WFB's grant and investment volume in the Nashville-Davidson-Murfreesboro-Franklin MSA is excellent. During the evaluation period, WFB made 34 grants and investments in the AA totaling \$5.9 million or 6.0 percent of allocated Tier 1 Capital. In addition, one prior period investment totaling \$189,000 or 0.2 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. Our conclusions considered the shortened evaluation period for this AA.

WFB's grants and investments demonstrated an adequate level of responsiveness to the need for affordable housing primarily through investments in Fannie Mae mortgage backed securities.

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

There were no limited-scope assessment areas in Tennessee. The rating assigned is based on the Nashville-Davidson-Murfreesboro-Franklin MSA.

## **SERVICE TEST**

WFB's Service Test performance in Tennessee is rated **Low Satisfactory**. Based on a full-scope review, performance in the Nashville-Davidson-Murfreesboro-Franklin is adequate.

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

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Tennessee full-scope AA is adequate.

In the Nashville-Davidson-Murfreesboro-Franklin, WFB's distribution of branches is adequate. Delivery systems are reasonably accessible to essentially all portions of the bank's assessment area.

The percentage distribution of branches in low- and moderate-income geographies is significantly below the percentage of the population residing in these geographies and is very poor and poor respectively. However, when considering two branch locations that are in close proximity to low-income geographies, accessibility improves in low-income geographies and is adequate.

##### ***Changes in Branch Location***

There were no branch openings or closings in the Tennessee full-scope AA during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services are tailored to the convenience and needs of the Tennessee full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are excellent and are tailored to the convenience and needs of the Nashville-Davidson-Murfreesboro-Franklin MSA, particularly moderate-income geographies and individuals. Although there were no branches in low-income census tracts, one hundred percent of branches located in moderate-income geographies maintained Saturday hours, compared to 40 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a poor level of CD services in the Tennessee full-scope AA.

In the Nashville-Davidson-Murfreesboro-Franklin, WFB provides a limited level of CD services. WFB employees provided a total of 40 hours of CD services. These hours represented 14 CD service activities that benefited seven different organizations, but amounted to slightly less than one and a half hours of CD service per branch per year.

Highlights of WFB's CD services that benefited the Tennessee full-scope AA include the following:

- A WFB employee serves on the finance committee of a CD organization that works to deliver solutions to the economic challenges that are affecting the lives of the people in the assessment area.

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

There were no limited-scope assessment areas in Tennessee. The rating assigned is based on the Nashville-Davidson-Murfreesboro-Franklin MSA.

Refer to Tables 1 - 15 in the Tennessee section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Utah Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Utah AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Utah AA.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Utah AA.
- WFB's CD lending had a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Utah AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope Utah AA.
- WFB's opening and closing of branches has not adversely affected the accessibility of its delivery systems within its full-scope Utah AA.

## Description of Institution's Operations in the State of Utah

Of the bank's 54 state and multistate rating areas, Utah ranks 19<sup>th</sup> and accounts for 1.1 percent of total bank deposits, or \$9.37 billion as of June 30, 2012. WFB has six defined AAs in Utah, which includes 23 out of 29 total counties in the state. Within the state, WFB operates 117 branches. Of the banks with significant retail operations in the state of Utah, WFB is the third largest banking institution with 2.8 percent of the deposit market share. Primary competitors include Zions First National Bank, and JP Morgan Chase Bank, with deposit market shares of 3.3 percent and 3.1 percent, respectively.

## Scope of Evaluation in the State of Utah

Of WFB's six AAs in Utah, the Salt Lake City MSA was selected for full-scope review. This AA accounts for 64.8 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Utah is rated **Outstanding**. Based on a full-scope review, performance in the Salt Lake City MSA is excellent.

### Lending Activity

The level of lending activity in the Utah full-scope AA is excellent. The level of lending activity in the Salt Lake City MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share percentage and ranking.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Utah full-scope AA is excellent. The distribution is excellent for home purchase and small loans to businesses, and good for home improvement, refinance, and small loans to farms.

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

Distribution of loans by borrower income in the Utah full-scope AA is good. The distribution is excellent for small loans to businesses and good for home purchase, home improvement, refinance, and small loans to farms.

### CD Lending

The volume and nature of the bank's CD lending had a significantly positive effect on performance in the Utah full-scope AA. WFB's CD lending had a significantly positive effect on Lending Test performance in the Salt Lake City MSA. WFB originated \$144.4 million in CD loans equal to 21.1 percent of allocated Tier 1 Capital. Thirteen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Utah full-scope AA include the following:

- The bank provided construction financing to an affordable housing organization, which was used to build an 83-unit LIHTC development in a moderate-income census tract in the assessment area

- A line of credit, used to fund capital expenditures, was extended to a non-profit community services organization that provides primary medical and dental care to low-income and uninsured patients in the assessment area.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Brigham City Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Utah. Performance under the Lending Test in the Ogden-Clearfield, Provo-Orem, and St. George MSAs, and Greater Utah Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Utah. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Utah.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Utah is rated **Outstanding**. Based on a full-scope review, performance in the Salt Lake City MSA is excellent.

WFB's grant and investment volume in the Salt Lake City MSA is excellent. During the evaluation period, WFB made 103 grants and investments in the AA totaling \$24.7 million or 3.6 percent of allocated Tier 1 Capital. In addition, 24 prior period grants and investments totaling \$17.9 million or 2.6 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the needs identified in the AA for affordable housing, community services, and revitalization/stabilization.

Highlights of WFB's grants and investments that benefited the Utah full-scope AA include the following:

- WFB provided a grant to an affordable housing organization that purchased foreclosed homes in revitalization areas of the Salt Lake MSA, rehabilitates them, and then resells them at or below market value to income-eligible families.
- The bank provided a grant to an affordable housing organization, which creates opportunities through housing, residential leadership, youth and economic development.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Ogden-Clearfield MSA and Brigham City and Greater Utah Non-Metropolitan AAs is not inconsistent with the bank's overall **Outstanding** performance in Utah. Performance under the Investment Test in Provo-Orem and St. George MSAs is weaker than the bank's overall **Outstanding** performance in Utah. Performance in limited-scope areas did not influence the Investment Test performance in Utah.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in Utah is rated **Outstanding**. Based on a full-scope review, performance in the Salt Lake City MSA is excellent.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in the Utah full-scope AA is excellent.

In the Salt Lake City MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all geographies and individuals of different income levels.

The percentage distribution of branches in low- and moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

#### *Changes in Branch Location*

To the extent changes have been made, WFB's record of opening and closing branches in the Utah full-scope AA has not adversely affected the accessibility of its delivery systems, particularly in low-and moderate- income geographies and/or to low- and moderate- income individuals.

To the extent changes have been made, WFB's record of opening and closing branches in the Salt Lake City MSA is good. WFB has not adversely affected the accessibility of its delivery systems, particularly in low- and moderate- income geographies and/or to low- and moderate- income individuals. During the evaluation period, WFB closed seven branches throughout the assessment area resulting in the loss of two branches in moderate-income geographies, four in middle-income geographies, and one in upper-income geographies. Although branch closings resulted in the loss of two moderate-income branches, distribution remained excellent after the closures.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours do not vary in a way that inconveniences portions of the Utah full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences portions of the Salt Lake City MSA, particularly low- and moderate-income geographies and individuals. Ninety-three percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to 97 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an excellent level of CD services in the Utah full-scope AA.

In the Salt Lake City MSA, WFB is a leader in providing CD services. WFB employees provided a total of 764 hours of CD services. These hours represented 162 CD service activities that benefited 34 different organizations and amounted to more than four hours of CD service per branch per year.

Highlights of WFB's CD services that benefited the Utah full-scope AA include the following:

- A WFB employee reviews applications for affordable funding projects or organizations, in their role as a committee member on a revitalization/stabilization organization the serves persons of low and moderate incomes in the assessment area.
- A WFB employee serves as chairperson on the board of an affordable housing organization that provides housing to very low-income individuals and families in the assessment area.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Ogden-Clearfield MSA and Greater Utah Non-Metropolitan AA and is not inconsistent with the bank's overall **Outstanding** performance in Utah. Performance under the Service Test in the Provo-Orem and St. George MSAs and Brigham City Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Utah. Performance in limited-scope areas did not influence the Service Test performance in Utah.

Refer to Tables 1 - 15 in the Utah section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Washington Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Washington AA.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Washington AA.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Washington AA.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants in its full-scope Washington AA.
- WFB's delivery systems are accessible to all portions of its full-scope Washington AA.
- To the extent changes have been made, WFB's record of opening and closing branch within its full-scope Washington AA did not affect the branch distribution in a negative or positive way.

### Description of Institution's Operations in the State of Washington

Of the bank's 54 state and multistate rating areas, Washington ranks 17<sup>th</sup> and accounts for 1.4 percent of total bank deposits, or \$12.0 billion as of June 30, 2012. WFB has 14 defined AAs in Washington, which include 20 out of 39 total counties in the state. Within the state, WFB operates 142 branches. WFB is the second largest banking institution in Washington with 11.0 percent of the deposit market share. Primary competitors include Bank of America and U.S. Bank, with deposit market shares of 21.7 percent and 10.5 percent, respectively.

### Scope of Evaluation in the State of Washington

Of WFB's 14 AAs in Washington, the Seattle-Bellevue-Everett MD was selected for full-scope review. This AA accounts for 71.5 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Washington is rated **Outstanding**. Based on a full-scope review, performance in the Seattle-Bellevue-Everett MD is excellent.

### Lending Activity

The level of lending activity in the Washington full-scope AA is excellent. The level of lending activity in the Seattle-Bellevue-Everett MD is excellent and is supported by an excellent level of activity for home purchase, home improvement, refinance, small loans to businesses, and small loans to farms in relation to WFB's deposit market share percentage and ranking.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Washington full-scope AA is good. In the Seattle-Bellevue-Everett MD, the overall geographic distribution of loans is good. The distribution is good for home refinance loans and small loans to businesses, excellent for home purchase loans, and adequate for home improvement loans and small loans to farms.

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

Distribution of loans by borrower income in the Washington full-scope AA is good. In the Seattle-Bellevue-Everett MD, the overall distribution of loans by borrower income is good. The distribution is good for home purchase, home improvement, and small loans to farms, excellent for small loans to businesses, and adequate for refinance loans.

### CD Lending

The volume and nature of the bank's CD lending had a significantly positive effect on performance in the Washington full-scope AA. WFB's CD loans had a significantly positive effect on performance in the Seattle-Bellevue-Everett MD. WFB originated \$134.4 million in CD loans equal to 13.9 percent of allocated Tier 1 Capital. Seventeen percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Washington full-scope AA include the following:

- WFB provided \$16.1 million in loans to an affordable housing organization that were used to fund the construction of two affordable housing complexes located in moderate-income census tracts in the Seattle-Bellevue-Everett MD.
- The bank provided a \$2.4 million capital expenditure line of credit to provide working capital to a community services organization, which provides medical and dental care to low-income and uninsured patients within the Seattle-Bellevue-Everett MD.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Bellingham, Bremerton-Silverdale, Mount Vernon-Anacortes, and Spokane MSAs is not inconsistent with the bank's overall **Outstanding** performance in Washington. Performance under the Lending Test in the Kennewick-Pasco-Richland, Olympia, Wenatchee-East Wenatchee, and Yakima MSAs and Centralia, Ellensburg, Okanogan County, and Olympic-Islands Non-Metropolitan AAs, and Tacoma MD is weaker than the bank's overall **Outstanding** performance in Washington. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Washington.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Washington is rated **Outstanding**. Based on a full-scope review, performance in the Seattle-Bellevue-Everett MD is excellent.

WFB's grant and investment volume in the Seattle-Bellevue-Everett MD is excellent. During the evaluation period, WFB made 161 grants and investments in the AA totaling \$45.7 million or 4.7 percent of allocated Tier 1 Capital. In addition, 35 prior period grants and investments totaling \$32.6 million or 3.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the needs identified in the AA for community services, affordable housing and revitalization/stabilization.

Highlights of WFB's grants and investments that benefited the Seattle-Bellevue-Everett MD include the following:

- WFB invested in a community services organization's new market tax credit project. The funds were used for the financing of a new medical and dental facility in a highly-distressed area with the Seattle-Bellevue-Everett MD.

- The bank provided funds, via an investment, that were used as part of an overall financing package for the acquisition/rehab costs associated with an affordable housing organization's real estate owned program.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Investment Test in Kennewick-Pasco-Richland, Spokane, and Wenatchee-East Wenatchee MSAs and Centralia Non-Metropolitan AA is not inconsistent with the bank's overall **Outstanding** performance in Washington. Performance under the Investment Test in Bellingham, Bremerton-Silverdale, Mount Vernon-Anacortes, Olympia, and Yakima MSAs, Ellensburg, Okanogan County, and Olympic-Islands Non-Metropolitan AAs, and Tacoma MD is weaker than the bank's overall **Outstanding** performance in Washington. Performance in limited-scope areas did not influence the Investment Test performance in Washington.

## SERVICE TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Service Test performance in Washington is rated **High Satisfactory**. Based on full-scope reviews, performance in the Seattle-Bellevue-Everett MD is good.

### Retail Banking Services

#### *Accessibility of Delivery Systems*

WFB's distribution of branches in the Washington full-scope AA is excellent.

In the Seattle-Bellevue-Everett MD, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low-income geographies exceeds the percentage of the population residing in these geographies and is excellent. The percentage distribution of branches in moderate-income geographies approximates the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an excellent alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in the Washington full-scope AA did not affect the branch distribution in a negative or positive way.

To the extent changes have been made, WFB's record of opening and closing branch offices in the Seattle-Bellevue-Everett MD, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the assessment area resulting in a net loss of one branch in a middle-income geography.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences portions of the Washington full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are adequate and do not vary in a way that inconveniences portions of the Seattle-Bellevue-Everett MD, particularly low- and moderate-income geographies and individuals. Eighty-eight percent of branches located in low- and moderate-income geographies maintained Saturday hours, compared to 93 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided a good level of CD services in the Washington full-scope AA.

In the Seattle-Bellevue-Everett MD, WFB provides a relatively high level of CD services. WFB employees provided a total of 1,059 hours of CD services. These hours represented 288 CD service activities that benefited 29 different organizations and amounted to slightly more than three hours per branch per year.

Highlights of WFB's CD services that benefited the Washington full-scope AA include the following:

- A WFB employee serves on the Board and Finance Committee of a community services organization that provides learning opportunities for the developmentally disabled children of low-income families within the assessment area.
- As a board member, a WFB employee provides financial expertise to an affordable housing organization that provides home ownership opportunities for low-income families in the assessment areas.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in Bremerton-Silverdale, Mount Vernon-Anacortes, Olympia, and Spokane MSAs, Tacoma MD, and Centralia, Okanogan County, and Olympic-Islands Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Washington. Performance under the Service Test in Bellingham, Kennewick-Pasco-Richland, Wenatchee-East Wenatchee, and Yakima MSAs and Ellensburg Non-Metropolitan Assessment Area is weaker than the bank's overall **High Satisfactory** performance in Washington. Performance in limited-scope areas did not influence the Service Test performance in Washington.

Refer to Tables 1 - 15 in the Washington section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Wisconsin Rating

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

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Wisconsin AAs.
- The geographic distribution of WFB's loans reflects good penetration throughout its full-scope Wisconsin AAs.
- The distribution of WFB's borrowers reflects good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Wisconsin AAs.
- WFB's CD lending has a significantly positive effect on Lending Test performance.
- WFB has an excellent level of qualified CD investments and grants within its full-scope Wisconsin AAs.
- WFB's delivery systems are readily accessible to essentially all portions of its full-scope Wisconsin AAs.
- WFB's branch hours and services do not vary in a way that inconveniences certain portions its full-scope Wisconsin AAs, particularly low- and moderate-income geographies and individuals.

## Description of Institution's Operations in the State of Wisconsin

Of the bank's 54 state and multistate rating areas, Wisconsin ranks 30<sup>th</sup> and accounts for 0.5 percent of total bank deposits, or \$3.9 billion as of June 30, 2012. WFB has 15 defined AAs in Wisconsin, which includes 25 out of 72 total counties in the state. Within the state, WFB operates 55 branches. WFB is the fifth largest banking institution in Wisconsin with 3.0 percent of the deposit market share. Primary competitors include U.S. Bank, NA, and BMO Harris Bank NA, with deposit market shares of 20.2 percent and 15.9 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Wisconsin

Of WFB's 15 AAs in Wisconsin, the Green Bay, La Crosse, and Milwaukee-Waukesha-West Allis MSAs were selected for full-scope review. These AAs account for 58.0 percent of the bank's state deposits and are the most significant AAs in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Wisconsin full-scope AAs is rated **Outstanding**. Based on full-scope reviews, performance in the Green Bay and Milwaukee-Waukesha-West Allis MSAs is excellent, and the La Crosse MSA is good.

### Lending Activity

The level of lending activity in Wisconsin full-scope AAs is excellent.

The level of lending activity in the Green Bay MSA is excellent and is supported by an excellent level of activity for home purchase, refinance, small loans to businesses and small loans to farm, and a good level of activity for home improvement in relation to WFB's deposit market share percentage and ranking.

The level of lending activity in the La Crosse MSA is good and is supported by an excellent level of activity for small loans to businesses and small loans to farms, a good level of activity for home purchase and refinance, and a very poor level of activity for home improvement in relation to WFB's deposit market share percentage and ranking. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

The level of lending activity in the Milwaukee-Waukesha-West Allis MSA is excellent and is supported by an excellent level of activity for home purchase, home improvement, refinance, small loans to businesses and farms in relation to WFB's deposit market share percentage or ranking. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in Wisconsin full-scope AAs is good

In the Green Bay MSA, the overall geographic distribution of loans is good. The distribution is good for home purchase and refinance, and excellent for home improvement, small loans to businesses, and small loans to farms.

In the La Crosse MSA, the overall geographic distribution of loans is good. We initially concluded that the distribution was adequate for home purchase, excellent for home improvement, small loans to businesses, and small loans to farms, and poor for refinance loans. Our evaluation of small loans to farms considered the small number of loans made by WFB relative to the limited number of farm lenders in the AA.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA, performance improved and distribution of home purchase loans was good.

In the Milwaukee-Waukesha-West Allis MSA, the overall geographic distribution of loans is good. We initially concluded that distribution was adequate for home purchase and small loans to businesses, excellent for small loans to farms, and poor for home improvement and refinance loans.

However, when we assessed lending in low- and/or moderate-income geographies relative to moderately severe economic conditions affecting the AA, credit demand as indicated by HMDA applications, and WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase and home refinance loans is good.

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

Distribution of loans by borrower income in Wisconsin full-scope AAs is good.

In the Green Bay MSA, the overall distribution of loans by borrower income is good. The distribution is good for home improvement loans, excellent for home purchase and small loans to businesses, and adequate for refinance and small loans to farms.

In the La Crosse MSA, the overall distribution of loans by borrower income is adequate. The distribution is good for home purchase, home improvement, and small loans to businesses, excellent for small loans to farms, and poor for refinance loans.

In the Milwaukee-Waukesha-West Allis MSA, the overall distribution of loans by borrower income is good. The distribution is good for home purchase loans, excellent for small loans to businesses and small loans to farms, and adequate for home improvement and refinance loans.

## CD Lending

The volume and nature of the bank's CD lending had a significantly positive effect on performance in Wisconsin full-scope AAs.

WFB's CD lending had a significantly positive effect on lending performance in the Green Bay MSA. WFB originated \$6.7 million in CD loans equal to 15.3 percent of allocated Tier 1 Capital.

WFB's CD loans had a neutral effect on performance in the La Crosse MSA. WFB originated \$200,000 in CD loans equal to 0.6 percent of allocated Tier 1 Capital. One hundred percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA. One Hundred percent of the loans were considered highly responsive to identified community needs.

WFB's CD loans had a significantly positive effect on performance in the Milwaukee-Waukesha-West Allis MSA. WFB originated \$19.5 million in CD loans equal to 11.1 percent of allocated Tier 1 Capital. Thirty-three percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a somewhat positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Green Bay, La Crosse and Milwaukee-Waukesha-West Allis MSAs include the following:

- In August 2010, WFB provided a \$5.0 million loan to finance the construction of a 36-bed specialty care facility located in Green Bay, Wisconsin. This non-profit organization believes that their tenants are full partners in the development of their plans for independence with assistance living. The majority of the residents are low- and moderate-income.
- WFB renewed a \$200,000 dollar line of credit used to fund working capital for a non-profit community services organization in the La Crosse MSA.
- The bank provided a \$6.8 million dollar loan to an affordable housing organization, which was used to provide financing for the construction of a 55-unit LIHTC affordable housing development in the Milwaukee-Waukesha-West Allis MSA.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Appleton, Eau Claire, Fond du Lac, Madison, Oshkosh-Neenah, Racine, and Wausau MSAs is not inconsistent with the bank's overall **Outstanding** performance in Wisconsin. Performance under the Lending Test in the Sheboygan MSA and Baraboo, Manitowoc, Marinette, and Northern

Wisconsin Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in Wisconsin. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Wisconsin.

## INVESTMENT TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Investment Test performance in Wisconsin is rated **Outstanding**. Based on full-scope reviews, performance in the Green Bay, La Crosse, and Milwaukee-Waukesha-West Allis MSAs is excellent.

WFB's grant and investment volume in the Green Bay MSA is excellent. During the evaluation period, WFB made nine grants and investments in the AA totaling \$9.1 million or 20.5 percent of allocated Tier 1 Capital. In addition, two prior period grants and investments totaling \$488,000 or 1.1 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the need identified in the AA for affordable housing.

WFB's grant and investment volume in the La Crosse MSA is excellent. During the evaluation period, WFB made nine grants and investments in the AA totaling \$4.3 million or 12.2 percent of allocated Tier 1 Capital. In addition, one prior period grant/investment totaling \$45,000 or 0.1 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. This prior period grant/investment adds support for the assigned rating. WFB's grants and investments were responsive to the need for affordable housing within the assessment area.

WFB's grant and investment volume in the Milwaukee-Waukesha-West Allis MSA is excellent. During the evaluation period, WFB made 88 grants and investments in the AA totaling \$20.7 million or 11.7 percent of allocated Tier 1 Capital. In addition, 22 prior period grants and investments totaling \$28.9 million or 16.4 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the needs identified in the AA for affordable housing and revitalization/stabilization.

Highlights of WFB's grants and investments that benefited the Wisconsin full-scope AAs include the following:

- WFB provided a grant to a local affordable housing organization that is being used to rehabilitate foreclosed or distressed housing for their resale to LMI individuals in the Milwaukee-Waukesha-West Allis MSA.

- WFB invested in a LIHTC fund whose purpose was to invest in 70 unit affordable housing project located in the Green Bay MSA.

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

Performance under the Investment Test in the Fond du Lac, Madison, Oshkosh-Neenah, and Wausau MSAs and Manitowoc and Marinette Non-Metropolitan AAs is not inconsistent with the bank's overall **Outstanding** performance in Wisconsin.

Performance under the Investment Test in the Appleton, Eau Clair, Racine, and Sheboygan MSAs and Baraboo and Northern Wisconsin Non-Metropolitan AA is weaker than the bank's overall **Outstanding** performance in Wisconsin. Performance in limited-scope areas did not influence the Investment Test performance in Wisconsin.

## **SERVICE TEST**

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

WFB's Service Test performance in Wisconsin is rated **Outstanding**. Based on full-scope reviews, performance is excellent in the Green Bay and Milwaukee-Waukesha-West Allis MSAs and good in the La Crosse MSA.

### **Retail Banking Services**

#### ***Accessibility of Delivery Systems***

WFB's distribution of branches in Wisconsin full-scope AAs is excellent.

In the Green Bay MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted on performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the La Crosse MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. WFB did not have branches in low-income census tracts, but these census tracts represented less than five percent of the total population in the assessment area, therefore our evaluation was weighted toward performance in the moderate-income census tract.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

In the Milwaukee-Waukesha-West Allis MSA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to geographies and individuals of different income levels.

The percentage distribution of branches in low- income geographies is below the percentage of population residing in these geographies and is adequate. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent. However, when giving consideration to two middle- and upper-income branch locations that are in close proximity to low- and moderate-income geographies, accessibility improves in low- income geographies and is good.

WFB's ATM network offers an adequate alternative delivery system to low- and moderate-income geographies and individuals through full-service ATMs in the assessment area.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branch offices in Wisconsin full-scope AAs did not affect the branch distribution in a negative or positive way.

To the extent changes have been made, WFB's record of opening and closing branches in the La Crosse MSA did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB closed one branch throughout the assessment area, resulting in a loss of one branch in a middle-income geography during the evaluation period.

There were no branch openings or closings in the Green Bay and Milwaukee-Waukesha-West Allis assessment areas during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences certain portions of Wisconsin full-scope AAs, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Green Bay MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 75 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the La Crosse MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 100 percent of branches located in middle- and upper-income geographies.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Milwaukee-Waukesha-West Allis MSA, particularly low- and moderate-income geographies and individuals. In low- and moderate-income geographies, 100 percent of branches located in those geographies maintained Saturday hours, compared to 78 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an excellent level of CD services in Wisconsin full-scope AAs.

In the Green Bay MSA, WFB is a leader in providing CD services. WFB employees provided a total of 148 hours of CD services. These hours represented ten CD service activities that benefited three different organizations and amounted to almost five hours of CD services per branch per year.

In the La Crosse MSA, WFB provides a relatively high level of CD services. WFB employees provided a total of 27 hours of CD services. These hours represented two CD service activities that benefited two different organizations and amounted to slightly more than three hours of service per branch per year.

In the Milwaukee-Waukesha-West Allis MSA, WFB is a leader in providing CD services. WFB employees provided a total of 899 hours of CD services. These hours represented 208 CD service activities that benefited 24 different organizations and amounted to more than 16 hours of CD service per branch per year.

Highlights of WFB's CD services that benefited Wisconsin full-scope AAs include the following:

- A WFB employee serves as a board member at an economic development organization that focuses on the revitalization of the city of La Crosse, in the La Crosse MSA.
- A WFB employee provides financial literacy training to a community services organization in the Milwaukee-Waukesha-West Allis MSA.

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

Performance under the Service Test in the Appleton and Eau Claire MSAs is not inconsistent with the bank's overall **Outstanding** performance in Wisconsin. Performance under the Service Test in Fond du Lac, Madison, Oshkosh-Neenah, Racine, Sheboygan, and Wausau MSAs and Baraboo, Manitowoc, Marinette, and Northern Wisconsin Non-Metropolitan AAs is weaker than the bank's overall **Outstanding** performance in Wisconsin. Performance in limited-scope areas did not influence the Service Test performance in Wisconsin.

Refer to Tables 1 - 15 in the Wisconsin section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test conclusions.

## State of Wyoming Rating

<b>CRA rating for the state:</b>	<b>Satisfactory</b>
<b>The Lending Test is rated:</b>	<b>High Satisfactory</b>
<b>The Investment Test is rated:</b>	<b>High Satisfactory</b>
<b>The Service Test is rated:</b>	<b>High Satisfactory</b>

The major factors that support this rating include the following:

- WFB's lending levels reflect excellent responsiveness to the credit needs of its full-scope Wyoming AA.
- The geographic distribution of WFB's loans reflects adequate penetration throughout its full-scope Wyoming AA.
- The distribution of WFB's borrowers reflect good penetration among borrowers of different income levels and businesses of different sizes within its full-scope Wyoming AA.
- WFB's CD lending had a neutral effect on Lending Test performance.
- WFB has a good level of qualified CD investments and grants within its full-scope Wyoming AA.
- WFB's delivery systems are readily accessible to all portions of its full-scope Wyoming AA.
- WFB provided an adequate level of CD services within its full-scope Wyoming AA.

## Description of Institution's Operations in the State of Wyoming

Of the bank's 54 state and multistate rating areas, Wyoming ranks 38th and accounts for 0.3 percent of total bank deposits, or \$2.09 billion as of June 30, 2012. WFB has four defined AAs in Wyoming, which include 14 out of 23 total counties in the state. Within the state, WFB operates 28 branches. WFB is the second largest banking institution in Wyoming with 16.1 percent of the deposit market share. Primary competitors include First Interstate bank, and Bank of the West, with deposit market shares of 16.7 percent and 6.8 percent, respectively.

We considered performance context factors in our evaluation of geographic and borrower distribution of loans. Please refer to the specific performance criteria for more details.

## Scope of Evaluation in the State of Wyoming

Of WFB's four AAs in Wyoming, the Western Wyoming Non-Metropolitan AA was selected for full-scope review. This AA accounts for 57 percent of the bank's state deposits and is the most significant AA in the state.

## LENDING TEST

### Conclusions for Areas Receiving Full-Scope Reviews

WFB's Lending Test performance in Wyoming is rated **High Satisfactory**. Based on a full-scope review, performance in the Western Wyoming Non-Metropolitan AA is good.

### Lending Activity

The level of lending activity in the Wyoming full-scope AA is excellent. The level of lending activity in Western Wyoming Non-Metropolitan AA is excellent and is supported by an excellent level of activity for home purchase, home improvement, and home refinance loans and small loans to businesses and farms in relation to WFB's deposit market share percentage or rank.

### Distribution of Loans by Income Level of Geography

Geographic distribution of loans in the Wyoming full-scope AA is adequate. We initially concluded that distribution was poor for home purchase and refinance, excellent for small loans to business, good for small loans to farms and adequate for home improvement.

When we assessed lending in moderate-income geographies relative to the credit demand as indicated by HMDA applications in the AA, performance improved. Although conclusions for home purchase and refinance loans remained poor, the overall geographic distribution of loans in the Western Wyoming Non-Metropolitan AA improved.

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

Distribution of loans by borrower income in the Wyoming full-scope AA is good. We initially concluded that distribution was adequate for home purchase, home improvement, refinance, and small loans to farms, and good for small loans to businesses.

However, when we assessed lending to low- and/or moderate-income borrowers relative to WFB's ranking and number of loans originated relative to all other lenders in the AA, performance improved and distribution of home purchase loans is considered good.

## CD Lending

The volume and nature of the bank's CD lending had a neutral effect on performance in the Wyoming full-scope AA. WFB's CD loans had a neutral effect on performance in the Western Wyoming Non-Metropolitan AA. WFB originated \$2.87 million in CD loans equal to 2.1 percent of allocated Tier 1 Capital. Ninety-one percent of WFB's CD loans were considered particularly complex and/or responsive to the needs of the AA and had a significantly positive effect on our assessment of CD lending performance in the AA.

Highlights of WFB's CD lending that benefited the Wyoming full-scope AA include the following:

- WFB provided construction financing to an affordable housing organization for the rehabilitation of a LIHTC apartment complex in the Western Wyoming Non-Metropolitan AA.
- The bank provided a line of credit that funded the working capital of a community service organization, which provides screening, assessment, and programming needs for children in the Western Non-Metropolitan Assessment Area.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Lending Test in the Casper and Cheyenne MSA and the Eastern Wyoming Non-Metropolitan AA is not inconsistent with the bank's overall **High Satisfactory** performance in Wyoming. Performance in these limited-scope assessment areas did not influence the Lending Test performance in Wyoming.

## INVESTMENT TEST

WFB's Investment Test performance in Wyoming is rated **High Satisfactory**. Based on a full-scope review, performance in the Western Wyoming Non-Metropolitan AA is good.

## Conclusions for Areas Receiving Full-Scope Reviews

WFB's grant and investment volume in the Western Wyoming Non-Metropolitan AA is good. During the evaluation period, WFB made eleven grants and investments in the AA totaling \$6.9 million or 4.4 percent of allocated Tier 1 Capital. In addition, four prior period grants and investments totaling \$781,000 or 0.6 percent of allocated Tier 1 Capital remained outstanding as of year-end 2012. These prior period grants and investments add support for the assigned rating. WFB's grants and investments demonstrated an adequate level of responsiveness to the needs identified in the AA for economic development and affordable housing.

Highlights of WFB's grants and investments that benefited the Wyoming full-scope AA include the following:

- WFB and an affordable housing organization formed a limited partnership to invest equity capital in new apartment buildings that qualify for LIHTCs in the Western Wyoming Non-Metropolitan AA.
- WFB invested funds with an economic development organization in the Western Wyoming Non-Metropolitan AA, which will be used to help create jobs for low- and moderate-income people and support the expansion of minority-owned businesses.

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

Performance under the Investment Test in Casper MSA and Eastern Wyoming Non-Metropolitan AA is stronger than the bank's overall **High Satisfactory** performance in Wyoming. Performance under the Investment Test in the Cheyenne MSA is weaker than the bank's overall **High Satisfactory** performance in Wyoming. Performance in limited-scope areas did not influence the Investment Test performance in Wyoming.

## **SERVICE TEST**

WFB's Service Test performance in Wyoming is rated **High Satisfactory**. Based on a full-scope review, performance in the Western Wyoming Non-Metropolitan AA is good.

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

#### **Retail Banking Services**

##### ***Accessibility of Delivery Systems***

WFB's distribution of branches in the Wyoming full-scope AA is excellent.

In the Western Wyoming Non-Metropolitan AA, WFB's distribution of branches is excellent. Delivery systems are readily accessible to all portions of the institution's assessment area.

WFB has no branches in low-income geographies in the AA. However, because less than five percent of the MSA population resides in these geographies, our conclusions were weighted toward performance in moderate-income geographies. The percentage distribution of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies and is excellent.

### ***Changes in Branch Location***

To the extent changes have been made, WFB's record of opening and closing branches in the Wyoming full-scope AA did not affect the branch distribution in a negative or positive way.

To the extent changes have been made, WFB's record of opening and closing branches in the Western Wyoming Non-Metropolitan AA, did not affect the branch distribution in a negative or positive way. During the evaluation period, WFB opened one and closed four branches throughout the assessment area resulting in a net loss of three branches in the middle-income geographies during the evaluation period.

### ***Reasonableness of Business Hours and Services***

WFB's branch hours and services do not vary in a way that inconveniences certain portions of the Wyoming full-scope AA, particularly low- and moderate-income geographies and individuals.

WFB's branch operating hours are good and do not vary in a way that inconveniences certain portions of the Western Wyoming Non-Metropolitan AA, particularly low- and moderate-income geographies and individuals. One hundred percent of branches located in moderate-income geographies maintained Saturday hours compared to 85 percent of branches located in middle- and upper-income geographies.

### **CD Services**

WFB provided an adequate level of CD services in the Wyoming full-scope AA.

In the Western Wyoming Non-Metropolitan AA, WFB provides an adequate level of CD services. WFB employees provided a total of 69 hours of CD services. These hours represented 26 CD service activities that benefited six different organizations and amounted to slightly more than one hour of CD service per branch per year. We considered the limited opportunities for CD services in our assessment of performance.

Highlights of WFB's CD services that benefited the Wyoming full-scope AA include the following:

- A WFB employee serves as treasurer and board member to an economic development organization in the Western Wyoming Non-Metropolitan AA.
- A WFB employee serves as treasurer and board member for a Western Wyoming Non-Metropolitan AA community services organization.

## Conclusions for Areas Receiving Limited-Scope Review

Performance under the Service Test in the Casper and Cheyenne MSAs and Eastern Wyoming Non-Metropolitan AAs is stronger than the bank's overall **High Satisfactory** performance in Wyoming. Performance in limited-scope areas did not influence the Service Test performance in Wyoming.

Refer to Tables 1 - 15 in the Wyoming section of Appendix D and the Lending Activity Table in Appendix E for the facts and data that support the Lending, Investment, and Service Test 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”).

Time Period Reviewed	Lending Test (excludes CD loans): (10/01/08 to 12/31/11) Investment and Service Tests and CD Loans: (10/01/08 to 12/31/12)			
<b>Financial Institution</b>		<b>Products Reviewed</b>		
Wells Fargo Bank, N.A. (WFB) Sioux Falls, South Dakota		Home Purchase, Home Improvement, Home Refinance, Small Business, Small Farm, and Community Develop Loans, Services, and Investments		
Multistate MSAs and States Reviewed	Lending Test (HMDA & Small Business)	Community Development Lending	Investment Test	Service Test
ALLENTOWN-BETHLEHEM-EASTON, PA-NJ MSA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
AUGUSTA-RICHMOND COUNTY, GA-SC MSA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
CHARLOTTE-GASTONIA-ROCK HILL, NC-SC MSA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
COLUMBUS-GA-AL MSA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
DAVENPORT-MOLINE-ROCK ISLAND, IA-IL MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
FARGO, ND-MN MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
GRAND FORKS, ND-MN MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
LOGAN, UT-ID MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)

MEMPHIS, TN-MS MSA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
MINNEAPOLIS-ST PAUL-BLOOMINGTON, MN-WI MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
NEW YORK-WHITE PLAINS-WAYNE, NY-NJ MD	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
OMAHA-COUNCIL BLUFFS, NE-IA MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
PORTLAND-VANCOUVER-HILLSBORO, OR-WA MSA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
TEXARKANA, TX-TEXARKANA, AR MSA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
WASHINGTON-ARLINGTON-ALEXANDRIA, DC-VA-MD MD	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
ALABAMA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
ALASKA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
ARKANSAS	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
ARIZONA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
CALIFORNIA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
COLORADO	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
CONNECTICUT	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
DELAWARE	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
FLORIDA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12

GEORGIA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
IDAHO	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
IOWA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
ILLINOIS	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
INDIANA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
KANSAS	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
MARYLAND	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
MICHIGAN	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
MINNESOTA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
MISSISSIPPI	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
MONTANA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
NEBRASKA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
NEVADA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
NEW JERSEY	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
NEW MEXICO	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
NEW YORK	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12

NORTH CAROLINA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
NORTH DAKOTA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
OHIO	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
OREGON	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
PENNSYLVANIA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
SOUTH CAROLINA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
SOUTH DAKOTA	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
TENNESSEE	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
TEXAS	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
UTAH	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
VIRGINIA	4/1/2010 to 12/31/11	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12	4/1/2010 to 12/31/12
WASHINGTON	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
WISCONSIN	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)
WYOMING	10/01/08 to 12/31/11)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)	10/01/08 to 12/31/12)

<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
Wells Fargo CD Corporation	Affiliate	CD Investments
Wachovia Wells Fargo Foundation formerly Wachovia Foundation	Affiliate	CD Investments (Grants)
Wells Fargo Foundation	Affiliate	CD Investments (Grants)
American Mortgage Network dba Vertice	Affiliate	HMDA
Wachovia Bank, N.A.	Affiliate	CRA SBSF; HMDA
Wachovia Mortgage FSB	Affiliate	HMDA
Wells Fargo Bank Northwest, N.A.	Affiliate	CRA SBSF
Wells Fargo Funding, Inc	Affiliate	HMDA
Wells Fargo Funding, Inc	Affiliate	HMDA
Wells Fargo Financial Arizona, Inc.	Affiliate	HMDA
Wells Fargo Financial Texas, Inc.	Affiliate	HMDA
Wells Fargo Financial Utah, Inc.	Affiliate	HMDA
Wells Fargo Financial Wyoming, Inc.	Affiliate	HMDA
Wells Fargo Financial Nebraska, Inc.	Affiliate	HMDA
Wells Fargo Financial Wisconsin, Inc.	Affiliate	HMDA
Wells Fargo Financial Montana, Inc.	Affiliate	HMDA
Wells Fargo Financial North Dakota, Inc.	Affiliate	HMDA
Wells Fargo Financial Minnesota, Inc.	Affiliate	HMDA
Wells Fargo Financial Indiana, Inc.	Affiliate	HMDA
Wells Fargo Financial Colorado, Inc.	Affiliate	HMDA
Wells Fargo Financial Alaska, Inc.	Affiliate	HMDA
Wells Fargo Financial South Dakota, Inc.	Affiliate	HMDA
Wells Fargo Financial Illinois, Inc.	Affiliate	HMDA
Wells Fargo Financial South	Affiliate	HMDA

Carolina, Inc.			
Wells Fargo Financial California, Inc.	Affiliate	HMDA	
Wells Fargo Financial Idaho, Inc.	Affiliate	HMDA	
Wells Fargo Financial Oregon, Inc.	Affiliate	HMDA	
Wells Fargo Financial America, Inc.	Affiliate	HMDA	
Wells Fargo Financial Iowa 3, Inc.	Affiliate	HMDA	
Wells Fargo Financial Nevada 2, Inc.	Affiliate	HMDA	
Wells Fargo Financial New Mexico, Inc.	Affiliate	HMDA	
Wells Fargo Financial Ohio 1, Inc.	Affiliate	HMDA	
Wells Fargo Financial Washington 1, Inc.	Affiliate	HMDA	
Wells Fargo Financial Michigan, Inc.	Affiliate	HMDA	
List of Assessment Areas and Type of Examination			
Assessment Area	MSA Number	Type of Exam	Other Information
Allentown-Bethlehem-Easton, PA-NJ MSA	10900	Full-Scope	
Augusta-Richmond County, GA-SC MSA	12260	Full-Scope	
Charlotte-Gastonia-Rock Hill, NC-SC MSA	16740	Full-Scope	
Columbus, GA-AL MSA	17980	Full-Scope	
Davenport-Moline-Rock Island, IA-IL MSA	19340	Full-Scope	
Fargo, ND-MN MSA	22020	Full-Scope	
Grand Forks, ND-MN MSA	24220	Full-Scope	
Logan, UT-ID MSA	30860	Full-Scope	
Memphis, TN-MS MSA	32820	Full-Scope	
Minneapolis-St. Paul-Bloomington, MN-WI MSA	33460	Full-Scope	
New York-Northern New Jersey-Long Island, NY-NJ-PA MSA	Multistate MSA		
New York-White Plains-Wayne, NY-NJ MD	35644	Full-Scope	
Newark-Union, NJ-PA MD	35084	Full-Scope	
Omaha-Council Bluffs, NE-IA MSA	36540	Full-Scope	
Portland-Vancouver-Hillsboro, OR-WA MSA	38900	Full-Scope	

Texarkana, TX-Texarkana, AR MSA	45500	Full-Scope	
Washington-Arlington-Alexandria, DC-VA-MD MD	47894	Full-Scope	
<b>ALABAMA</b>	State		
Birmingham-Hoover, AL MSA	13820	Full-Scope	
Huntsville, AL MSA	26620	Full-Scope	
Montgomery, AL MSA	33860	Full-Scope	
Anniston-Oxford, AL MSA	11500	Limited-Scope	
Auburn-Opelika, AL MSA	12220	Limited-Scope	
Baldwin County, AL Non-Metro		Limited-Scope	
Cullman-Marshall, AL Non-Metro		Limited-Scope	
Dallas County, AL Non-Metro		Limited-Scope	
Decatur, AL MSA	19460	Limited-Scope	
Dothan, AL MSA	20020	Limited-Scope	
Eastern Central AL Non-Metro		Limited-Scope	
Florence-Muscle Shoals, AL MSA	22520	Limited-Scope	
Gadsden, AL MSA	23460	Limited-Scope	
Marion County, AL Non-Metro		Limited-Scope	
Mobile, AL MSA	33660	Limited-Scope	
Southeastern AL Non-Metro		Limited-Scope	
Tuscaloosa, AL MSA	46220	Limited-Scope	
<b>ALASKA</b>	State		
Greater AK Non-Metro		Full-Scope	
Anchorage, AK MSA	11260	Full-Scope	
Fairbanks, AK MSA	21820	Limited-Scope	
<b>ARKANSAS</b>	State		
Ashdown, AR Non-Metro		Full-Scope	
<b>ARIZONA</b>	State		
Phoenix-Mesa-Glendale, AZ MSA	38060	Full-Scope	
Tucson, AZ MSA	46060	Full-Scope	
Eastern AZ Non-Metro		Limited-Scope	
Flagstaff, AZ MSA	22380	Limited-Scope	
Lake Havasu City-Kingman, AZ MSA	29420	Limited-Scope	
Nogales-Douglas, AZ Non-Metro		Limited-Scope	
Prescott, AZ MSA	39140	Limited-Scope	
Western AZ Non-Metro		Limited-Scope	
Yuma, AZ MSA	49740	Limited-Scope	

<b>CALIFORNIA</b>	State		
Fresno, CA MSA	23420	Full-Scope	
Los Angeles-Long Beach-Glendale, CA MD	31084	Full-Scope	
Oakland-Fremont-Hayward, CA MD	36084	Full-Scope	
Riverside-San Bernardino-Ontario, CA MSA	40140	Full-Scope	
San Francisco-San Mateo-Redwood City, CA MD	41884	Full-Scope	
Santa Ana-Anaheim-Irvine, CA MD	42044	Full-Scope	
Bakersfield-Delano, CA MSA	12540	Limited-Scope	
Central CA Non-Metro		Limited-Scope	
Chico, CA MSA	17020	Limited-Scope	
Eastern CA Non-Metro		Limited-Scope	
El Centro, CA MSA	20940	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	
Northern CA Non-Metro		Limited-Scope	
Oxnard-Thousand Oaks-Ventura, CA MSA	37100	Limited-Scope	
Redding, CA MSA	39820	Limited-Scope	
Sacramento--Arden-Arcade--Roseville, CA MSA	40900	Limited-Scope	
Salinas, CA MSA	41500	Limited-Scope	
San Diego-Carlsbad-San Marcos, CA MSA	41740	Limited-Scope	
San Jose-Sunnyvale-Santa Clara, CA MSA	41940	Limited-Scope	
San Luis Obispo-Paso Robles, CA MSA	42020	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	
Truckee-Grass Valley, CA Non-Metro		Limited-Scope	
Vallejo-Fairfield, CA MSA	46700	Limited-Scope	
Visalia-Porterville, CA MSA	47300	Limited-Scope	

Yuba City, CA MSA	49700	Limited-Scope	
<b>COLORADO</b>	State		
Denver-Aurora-Broomfield, CO MSA	19740	Full-Scope	
Boulder, CO MSA	14500	Limited-Scope	
Canon City, CO Non-Metro		Limited-Scope	
Colorado Springs, CO MSA	17820	Limited-Scope	
Durango, CO Non-Metro		Limited-Scope	
Fort Collins-Loveland, CO MSA	22660	Limited-Scope	
Grand Junction, CO MSA	24300	Limited-Scope	
Greeley, CO MSA	24540	Limited-Scope	
Pueblo, CO MSA	39380	Limited-Scope	
Sterling-Fort Morgan, CO Non-Metro		Limited-Scope	
Western CO Non-Metro		Limited-Scope	
<b>CONNECTICUT</b>	State		
Bridgeport-Stamford-Norwalk, CT MSA	14860	Full-Scope	
New Haven-Milford, CT MSA	35300	Full-Scope	
Hartford-West Hartford-East Hartford, CT MSA	25540	Limited-Scope	
Litchfield County, CT Non-Metro		Limited-Scope	
<b>DELAWARE</b>	State		
Wilmington, DE MD	48864	Full-Scope	
Dover, DE MSA	20100	Limited-Scope	
Sussex County, DE Non-Metro		Limited-Scope	
<b>FLORIDA</b>	State		
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	22744	Full-Scope	
Miami-Miami Beach-Kendall, FL MD	33124	Full-Scope	
Orlando-Kissimmee-Sanford, FL MSA	36740	Full-Scope	
Tampa-St. Petersburg-Clearwater, FL MSA	45300	Full-Scope	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	48424	Full-Scope	
Cape Coral-Fort Myers, FL MSA	15980	Limited-Scope	
Citrus-Sumter, FL Non-Metro		Limited-Scope	
Crestview-Fort Walton Beach-Destin, FL MSA	18880	Limited-Scope	
Deltona-Daytona Beach-	19660	Limited-Scope	

Ormond Beach, FL MSA			
DeSoto-Highlands, FL Non-Metro		Limited-Scope	
Gainesville, FL MSA	23540	Limited-Scope	
Jacksonville, FL MSA	27260	Limited-Scope	
Lakeland-Winter Haven, FL MSA	29460	Limited-Scope	
Madison-Taylor, FL Non-Metro		Limited-Scope	
Monroe County, FL Non-Metro		Limited-Scope	
Naples-Marco Island, FL MSA	34940	Limited-Scope	
North Port-Bradenton-Sarasota, FL MSA	35840	Limited-Scope	
Ocala, FL MSA	36100	Limited-Scope	
Palm Bay-Melbourne- Titusville, FL MSA	37340	Limited-Scope	
Palm Coast, FL MSA	37380	Limited-Scope	
Panama City-Lynn Haven- Panama City Beach, FL MSA	37460	Limited-Scope	
Panhandle FL Non-Metro		Limited-Scope	
Pensacola-Ferry Pass-Brent, FL MSA	37860	Limited-Scope	
Port St Lucie, FL MSA	36940	Limited-Scope	
Punta Gorda, FL MSA	39460	Limited-Scope	
Sebastian-Vero Beach, FL MSA	42680	Limited-Scope	
Tallahassee, FL MSA	45220	Limited-Scope	
<b>GEORGIA</b>	State		
Atlanta-Sandy Springs- Marietta, GA MSA	12060	Full-Scope	
Athens-Clarke County, GA MSA	12020	Limited-Scope	
Brunswick, GA MSA	15260	Limited-Scope	
Bulloch County, GA Non-Metro		Limited-Scope	
Chattanooga, GA MSA	16860	Limited-Scope	
Dalton, GA MSA	19140	Limited-Scope	
Gainesville, GA MSA	23580	Limited-Scope	
Gordon County, GA Non- Metro		Limited-Scope	
Greene County, GA Non- Metro		Limited-Scope	
Hinesville-Fort Stewart, GA MSA	25980	Limited-Scope	
Jackson County, GA Non- Metro		Limited-Scope	
Laurens County, GA Non- Metro		Limited-Scope	

Lumpkin County, GA Non-Metro		Limited-Scope	
Macon, GA MSA	31420	Limited-Scope	
Rome, GA MSA	40660	Limited-Scope	
Savannah, GA MSA	42340	Limited-Scope	
Southern GA Non-Metro		Limited-Scope	
Sumter County, GA Non-Metro		Limited-Scope	
Warner Robins, GA MSA	47580	Limited-Scope	
Washington County, GA Non-Metro		Limited-Scope	
<b>IDAHO</b>	State		
Boise City-Nampa, ID MSA	14260	Full-Scope	
Central ID Non-Metro		Full-Scope	
Bear Lake County, ID Non-Metro		Limited-Scope	
Coeur d'Alene, ID MSA	17660	Limited-Scope	
Idaho Falls, ID MSA	26820	Limited-Scope	
Lewiston, ID MSA	30300	Limited-Scope	
Panhandle ID Non-Metro		Limited-Scope	
Pocatello, ID MSA	38540	Limited-Scope	
Rexburg-Driggs, ID Non-Metro		Limited-Scope	
Western ID Non-Metro		Limited-Scope	
<b>IOWA</b>	State		
Cedar Rapids, IA MSA	16300	Full-Scope	
Des Moines-West Des Moines, IA MSA	19780	Full-Scope	
Ames, IA MSA	11180	Limited-Scope	
Cass County, IA Non-Metro		Limited-Scope	
Crawford County, IA Non-Metro		Limited-Scope	
Fort Dodge, IA Non-Metro		Limited-Scope	
Iowa City, IA MSA	26980	Limited-Scope	
Marion County, IA Non-Metro		Limited-Scope	
Marshalltown, IA Non-Metro		Limited-Scope	
Mason City, IA Non-Metro		Limited-Scope	
Ottumwa, IA Non-Metro		Limited-Scope	
Palo Alto County, IA Non-Metro		Limited-Scope	
Poweshiek County, IA Non-Metro		Limited-Scope	
Sioux City, IA MSA	43580	Limited-Scope	
Waterloo-Cedar Falls, IA MSA	47940	Limited-Scope	
<b>ILLINOIS</b>	State		

Chicago-Joliet-Naperville, IL MD	16974	Full-Scope	
Galesburg-Canton, IL Non-Metro		Limited-Scope	
Sterling, IL Non-Metro		Limited-Scope	
<b>INDIANA</b>	State		
Fort Wayne, IN MSA	23060	Full-Scope	
Northeastern IN Non-Metro		Full-Scope	
Decatur, IN Non-Metro		Limited-Scope	
Elkhart-Goshen, IN MSA	21140	Limited-Scope	
Indianapolis-Carmel, IN MSA	26900	Limited-Scope	
Michigan City-La Porte, IN MSA	33140	Limited-Scope	
North Central IN Non-Metro		Limited-Scope	
Rush County, IN Non-Metro		Limited-Scope	
South Bend-Mishawaka, IN MSA	43780	Limited-Scope	
White County, IN Non-Metro		Limited-Scope	
<b>KANSAS</b>	State		
Kansas City, KS MSA	28140	Full-Scope	
Atchison County, KS Non-Metro		Limited-Scope	
Wichita, KS MSA	48620	Limited-Scope	
<b>MARYLAND</b>	State		
Baltimore-Towson, MD MSA	12580	Full-Scope	
Bethesda-Rockville-Frederick, MD	13644	Limited-Scope	
<b>MICHIGAN</b>	State		
Northwestern MI Non-Metro		Full-Scope	
Grand Rapids-Wyoming, MI MSA	24340	Limited-Scope	
<b>MINNESOTA</b>	State		
Greater MN Non-Metro		Full-Scope	
Duluth, MN MSA	20260	Limited-Scope	
Mankato-North Mankato, MN MSA	31860	Limited-Scope	
Northeastern MN Non-Metro		Limited-Scope	
Rochester, MN MSA	40340	Limited-Scope	
St. Cloud, MN MSA	41060	Limited-Scope	
<b>MISSISSIPPI</b>	State		
Jackson, MS MSA	27140	Full-Scope	
Gulfport-Biloxi, MS MSA	25060	Full-Scope	
Hattiesburg, MS MSA	25620	Limited-Scope	

Pascagoula, MS MSA	37700	Limited-Scope	
<b>MONTANA</b>	State		
Billings, MT MSA	13740	Full-Scope	
Greater MT Non-Metro		Full-Scope	
Eastern MT Non-Metro		Limited-Scope	
Fallon County, MT Non-Metro		Limited-Scope	
Great Falls, MT MSA	24500	Limited-Scope	
Mineral County, MT Non-Metro		Limited-Scope	
Missoula, MT MSA	33540	Limited-Scope	
<b>NEBRASKA</b>	State		
Lincoln, NE MSA	30700	Full-Scope	
Tri-City, NE Non-Metro		Full-Scope	
Norfolk, NE Non-Metro		Limited-Scope	
North Platte, NE Non-Metro		Limited-Scope	
Northern NE Non-Metro		Limited-Scope	
Red Willow County, NE Non-Metro		Limited-Scope	
Western NE Non-Metro		Limited-Scope	
<b>NEVADA</b>	State		
Las Vegas-Paradise, NV MSA	29820	Full-Scope	
Reno-Sparks, NV MSA	39900	Limited-Scope	
Greater NV Non-Metro		Limited-Scope	
Carson City, NV MSA	16180	Limited-Scope	
<b>NEW JERSEY</b>	State		
Edison-New Brunswick, NJ MD	20764	Full-Scope	
Atlantic City-Hammonton, NJ MSA	12100	Limited-Scope	
Camden, NJ MD	15804	Limited-Scope	
Ocean City, NJ MSA	36140	Limited-Scope	
Trenton-Ewing, NJ MSA	45940	Limited-Scope	
<b>NEW MEXICO</b>	State		
Albuquerque, NM MSA	10740	Full-Scope	
Greater NM Non-Metro		Full-Scope	
Farmington, NM MSA	22140	Limited-Scope	
Las Cruces, NM MSA	29740	Limited-Scope	
Santa Fe, NM MSA	42140	Limited-Scope	
<b>NEW YORK</b>	State		
Nassau-Suffolk, NY MD	35004	Full-Scope	
Kingston, NY MSA	28740	Limited-Scope	
Poughkeepsie-Newburgh-	39100	Limited-Scope	

Middletown, NY MSA			
<b>NORTH CAROLINA</b>	State		
Greensboro-High Point, NC MSA	24660	Full-Scope	
Northwestern NC Non-Metro		Full-Scope	
Raleigh-Cary, NC MSA	39580	Full-Scope	
Winston-Salem, NC MSA	49180	Full-Scope	
Asheville, NC MSA	11700	Limited-Scope	
Burlington, NC MSA	15500	Limited-Scope	
Camden-Pasquotank, NC Non-Metro		Limited-Scope	
Dare County, NC Non-Metro		Limited-Scope	
Durham-Chapel Hill, NC MSA	20500	Limited-Scope	
Eastern NC Non-Metro		Limited-Scope	
Fayetteville, NC MSA	22180	Limited-Scope	
Goldsboro, NC MSA	24140	Limited-Scope	
Greenville, NC MSA	24780	Limited-Scope	
Hickory-Lenoir-Morganton, NC MSA	25860	Limited-Scope	
Jacksonville, NC MSA	27340	Limited-Scope	
Lee-Moore, NC Non-Metro		Limited-Scope	
Rocky Mount, NC MSA	40580	Limited-Scope	
Southern NC Non-Metro		Limited-Scope	
Western NC Non-Metro		Limited-Scope	
Wilmington, NC MSA	48900	Limited-Scope	
Wilson County, NC Non-Metro		Limited-Scope	
<b>NORTH DAKOTA</b>	State		
Bismarck, ND MSA	13900	Full-Scope	
Minot, ND Non-Metro		Full-Scope	
Bowman County, ND Non-Metro		Limited-Scope	
Dickinson, ND Non-Metro		Limited-Scope	
Jamestown, ND Non-Metro		Limited-Scope	
Northeastern ND Non-Metro		Limited-Scope	
Traill County, ND Non-Metro		Limited-Scope	
Wahpeton, ND Non-Metro		Limited-Scope	
OHIO	State		
Van Wert, OH Non-Metro		Full-Scope	
Cleveland-Elyria-Mentor, OH MSA	17460	Limited-Scope	
<b>OREGON</b>	State		
Eugene-Springfield, OR MSA	21660	Full-Scope	

Salem, OR MSA	41420	Full-Scope	
Southwestern OR Non-Metro		Full-Scope	
Bend, OR MSA	13460	Limited-Scope	
Coastal OR Non-Metro		Limited-Scope	
Corvallis, OR MSA	18700	Limited-Scope	
Eastern OR Non-Metro		Limited-Scope	
Medford, OR MSA	32780	Limited-Scope	
Northern OR Non-Metro		Limited-Scope	
<b>PENNSYLVANIA</b>	State		
Philadelphia, PA MD	37964	Full-Scope	
Harrisburg-Carlisle, PA MSA	25420	Limited-Scope	
Lancaster, PA MSA	29540	Limited-Scope	
Lebanon, PA MSA	30140	Limited-Scope	
Monroe-Wayne, PA Non-Metro		Limited-Scope	
Northumberland-Schuylkill, PA Non-Metro		Limited-Scope	
Reading, PA MSA	39740	Limited-Scope	
Scranton--Wilkes-Barre, PA MSA	42540	Limited-Scope	
York-Hanover, PA MSA	49620	Limited-Scope	
<b>SOUTH CAROLINA</b>	State		
Charleston-North Charleston-Summerville, SC MSA	16700	Full-Scope	
Columbia, SC MSA	17900	Full-Scope	
Greenville-Mauldin-Easley, SC MSA	24860	Full-Scope	
Anderson, SC MSA	11340	Limited-Scope	
Florence, SC MSA	22500	Limited-Scope	
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	34820	Limited-Scope	
Northeastern SC Non-Metro		Limited-Scope	
Northwestern SC Non-Metro		Limited-Scope	
Oconee County, SC Non-Metro		Limited-Scope	
Southern SC Non-Metro		Limited-Scope	
Spartanburg, SC MSA	43900	Limited-Scope	
Sumter, SC MSA		Limited-Scope	
<b>SOUTH DAKOTA</b>	State		
Greater SD Non-Metro		Full-Scope	
Sioux Falls, SD MSA	43620	Full-Scope	
Fall River County, SD Non-Metro		Limited-Scope	
Mitchell, SD Non-Metro		Limited-Scope	

Rapid City, SD MSA	39660	Limited-Scope	
Western SD Non-Metro		Limited-Scope	
Yankton-Vermillion, SD Non-Metro		Limited-Scope	
<b>TENNESSEE</b>	State		
Nashville-Davidson-- Murfreesboro-Franklin, TN MSA	34980	Full-Scope	
<b>TEXAS</b>	State		
Austin-Round Rock-San Marcos, TX MSA	12420	Full-Scope	
Dallas-Plano-Irving, TX MD	19124	Full-Scope	
El Paso, TX MSA	21340	Full-Scope	
Fort Worth-Arlington, TX MD	23104	Full-Scope	
Houston-Sugar Land-Baytown, TX MSA	26420	Full-Scope	
Amarillo, TX MSA	11100	Limited-Scope	
Atlanta, TX Non-Metro		Limited-Scope	
Beaumont-Port Arthur, TX MSA	13140	Limited-Scope	
Big Spring, TX Non-Metro		Limited-Scope	
Borger, TX Non-Metro		Limited-Scope	
Brazos Valley, TX Non-Metro		Limited-Scope	
Brownsville-Harlingen, TX MSA	15180	Limited-Scope	
Central TX Non-Metro		Limited-Scope	
College Station-Bryan, TX MSA	17780	Limited-Scope	
Corpus Christi, TX MSA	18580	Limited-Scope	
Garza County, TX Non-Metro		Limited-Scope	
Hartley County, TX Non-Metro		Limited-Scope	
Hill County, TX Non-Metro		Limited-Scope	
Kerrville, TX Non-Metro		Limited-Scope	
Killeen-Temple-Fort Hood, TX MSA	28660	Limited-Scope	
Laredo, TX MSA	29700	Limited-Scope	
Lubbock, TX MSA	31180	Limited-Scope	
McAllen-Edinburg-Mission, TX MSA	32580	Limited-Scope	
Midland, TX MSA	33260	Limited-Scope	
Montague County, TX Non- Metro		Limited-Scope	
Odessa, TX MSA	36220	Limited-Scope	
Plainview, TX Non-Metro		Limited-Scope	
San Angelo, TX MSA	41660	Limited-Scope	

San Antonio-New Braunfels, TX MSA	41700	Limited-Scope	
South TX Non-Metro		Limited-Scope	
Southeastern TX Non-Metro		Limited-Scope	
Victoria, TX MSA	47020	Limited-Scope	
Waco, TX MSA	47380	Limited-Scope	
Wichita Falls, TX MSA	48660	Limited-Scope	
Yoakum County, TX Non-Metro		Limited-Scope	
<b>UTAH</b>	State		
Salt Lake City, UT MSA	41620	Full-Scope	
Brigham City, UT Non-Metro		Limited-Scope	
Greater UT Non-Metro		Limited-Scope	
Ogden-Clearfield, UT MSA	36260	Limited-Scope	
Provo-Orem, UT MSA	39340	Limited-Scope	
St. George, UT MSA	41100	Limited-Scope	
<b>VIRGINIA</b>	State		
Richmond, VA MSA	40060	Full-Scope	
Virginia Beach-Norfolk-Newport News, VA MSA	47260	Full-Scope	
Blacksburg-Christiansburg-Radford, VA MSA	13980	Limited-Scope	
Charlottesville, VA MSA	16820	Limited-Scope	
Danville, VA MSA	19260	Limited-Scope	
Harrisonburg, VA MSA	25500	Limited-Scope	
Kingsport-Bristol-Bristol, VA MSA	28700	Limited-Scope	
Lynchburg, VA MSA	31340	Limited-Scope	
Martinsville-Henry County, VA Non-Metro		Limited-Scope	
Northern VA Non-Metro		Limited-Scope	
Northwestern VA Non-Metro		Limited-Scope	
Prince Edward County, VA Non-Metro		Limited-Scope	
Roanoke, VA MSA	40220	Limited-Scope	
Southside VA Non-Metro		Limited-Scope	
Western VA Non-Metro		Limited-Scope	
Winchester, VA MSA	49020	Limited-Scope	
<b>WASHINGTON</b>	State		
Seattle-Bellevue-Everett, WA MD	42644	Full-Scope	
Bellingham, WA MSA	13380	Limited-Scope	
Bremerton-Silverdale, WA MSA	14740	Limited-Scope	

Centralia, WA Non-Metro		Limited-Scope	
Ellensburg, WA Non-Metro		Limited-Scope	
Kennewick-Pasco-Richland, WA MSA	28420	Limited-Scope	
Mount Vernon-Anacortes, WA MSA	34580	Limited-Scope	
Okanogan County, WA Non-Metro		Limited-Scope	
Olympia, WA MSA	36500	Limited-Scope	
Olympic-Islands, WA Non-Metro		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	
<b>WISCONSIN</b>	State		
Green Bay, WI MSA	24580	Full-Scope	
La Crosse, WI MSA	29100	Full-Scope	
Milwaukee-Waukesha-West Allis, WI MSA	33340	Full-Scope	
Appleton, WI MSA	11540	Limited-Scope	
Baraboo, WI Non-Metro		Limited-Scope	
Eau Claire, WI MSA	20740	Limited-Scope	
Fond du Lac, WI MSA	22540	Limited-Scope	
Madison, WI MSA	31540	Limited-Scope	
Manitowoc, WI Non-Metro		Limited-Scope	
Marinette, WI Non-Metro		Limited-Scope	
Northern WI Non-Metro		Limited-Scope	
Oshkosh-Neenah, WI MSA	36780	Limited-Scope	
Racine, WI MSA	39540	Limited-Scope	
Sheboygan, WI MSA	43100	Limited-Scope	
Wausau, WI MSA	48140	Limited-Scope	
<b>WYOMING</b>	State		
Western WY Non-Metro		Full-Scope	
Casper, WY MSA	16220	Limited-Scope	
Cheyenne, WY MSA	16940	Limited-Scope	
Eastern WY Non-Metro		Limited-Scope	

## Appendix B: Summary of Multistate Metropolitan Area and State Ratings

RATINGS Wells Fargo Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Wells Fargo Bank, N.A.	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Primary Multistate Metropolitan Area or State:				
Charlotte-Gastonia-Rock Hill (NC-SC)	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>Satisfactory</b>
Minneapolis-St. Paul-Bloomington (MN-WS)	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>
New York-Northern New Jersey-Long Island (NY-NJ-PA)	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Washington-Arlington-Alexandria (DC-VA-MD)	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Arizona	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
California	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Colorado	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Florida	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Georgia	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Nevada	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
New Jersey	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
North Carolina	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Pennsylvania	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Texas	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Virginia	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Other Multistate Metropolitan Area or State:				
Allentown-Bethlehem-Easton, PA-NJ MSA	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Augusta-Richmond County, GA-SC MSA	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>

Columbus-GA-AL MSA	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Davenport-Moline- Rock Island, IA-IL MSA	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Fargo, ND-MN MSA	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Grand Forks, ND- MN MSA	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
Logan, UT-ID MSA	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>
Memphis, TN-MS MSA	<b>Outstanding</b>	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>Outstanding</b>
Omaha-Council Bluffs, NE-IA MSA	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Portland- Vancouver- Hillsboro, OR-WA MSA	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Texarkana, TX- Texarkana, AR MSA	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Alabama	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Alaska	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Arkansas	<b>Low Satisfactory</b>	<b>Low Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
Connecticut	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Delaware	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
Idaho	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>
Iowa	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Illinois	<b>Outstanding</b>	<b>Outstanding</b>	<b>Needs To Improve</b>	<b>Satisfactory</b>
Indiana	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Kansas	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Maryland	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>
Michigan	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Minnesota	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Mississippi	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Montana	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Nebraska	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
New Mexico	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
New York	<b>Outstanding</b>	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>Outstanding</b>
North Dakota	<b>High Satisfactory</b>	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
Ohio	<b>High Satisfactory</b>	<b>Low Satisfactory</b>	<b>Low Satisfactory</b>	<b>Satisfactory</b>
Oregon	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
South Carolina	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>

South Dakota	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>
Tennessee	<b>Outstanding</b>	<b>Outstanding</b>	<b>Low Satisfactory</b>	<b>Outstanding</b>
Utah	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>
Washington	<b>Outstanding</b>	<b>Outstanding</b>	<b>High Satisfactory</b>	<b>Outstanding</b>
Wisconsin	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>	<b>Outstanding</b>
Wyoming	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>High Satisfactory</b>	<b>Satisfactory</b>

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

## Appendix C: Market Profiles for Primary Full-Scope Rating Areas

### Charlotte-Gastonia-Rock Hill, NC-SC MSA

Demographic Information for Full-scope Area: Charlotte-Gastonia-Rock Hill NC-SC MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	428	10.98	27.10	29.44	31.31	1.17
Population by Geography	1,758,038	8.52	25.12	31.87	34.37	0.12
Owner-Occupied Housing by Geography	439,291	4.42	21.40	34.85	39.31	0.01
Business by Geography	184,225	8.64	19.78	28.78	41.77	1.03
Farms by Geography	4,016	5.53	21.86	41.96	30.35	0.30
Family Distribution by Income Level	435,147	21.58	17.68	20.17	40.57	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	170,831	14.83	37.50	31.11	16.56	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,787 68,500 12 percent	Median Housing Value Unemployment Rate (2010 U.S. Census)		188,857 4.70 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Charlotte-Gastonia-Rock Hill MSA is a multistate MSA comprising Anson, Cabarrus, Gaston, Mecklenburg, and Union counties in North Carolina and York County in South Carolina. The AA meets regulatory requirements and does not arbitrarily exclude low- and moderate-income areas. Mecklenburg County is the most populous county in the MSA with a population of 919,625 as of the 2010 census. The largest municipality in the MSA is the City of Charlotte, with a population of 736,780 as of 2010 and an estimated population of 775,202 in 2012. The Charlotte MSA is the largest in the Carolinas and the fifth largest metropolitan area in the Southeastern region of the U.S., behind Miami, Atlanta, Washington, D.C., and Tampa.

Charlotte is the second largest banking and finance center in the U.S., and the area's orientation towards emerging industries is seen in the success of the University Research Park (the 7th largest research park in the country) and the redevelopment of part of the Pillowtex site in Kannapolis as a biotech research facility featuring the participation of University of North Carolina at Charlotte, University of North Carolina at Chapel Hill, Duke University and North Carolina State University. The region is headquarters to 8 Fortune 500 and 7 Fortune 1000 companies including Bank of America, Duke Energy, Nucor Steel, and Lowe's Home Improvement Stores. Additional headquarters include Harris Teeter, Food Lion, Cheerwine and Sundrop.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Charlotte-Gastonia-Rock Hill MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, challenges exist in lending to low-income families in the Charlotte-Gastonia-Rock Hill MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Charlotte-Gastonia-Rock Hill MSA, we determined that cumulatively, the effect of these factors on demand for home purchase and refinance loans from low-income families was moderately severe. We evaluated the bank's lending performance in the Charlotte-Gastonia-Rock Hill MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

A review of community contacts indicated that the following are identified needs within the community:

- Affordable multifamily rental housing
- Homeownership preservation
- Neighborhood stabilization
- Access to capital for small businesses
- Job creation, and
- Financial education

The level of opportunity to make and provide CD loans, investments and services is considered good.

Opportunities for participation by financial institutions include the following:

- Working with local, statewide and regional CDFIs to offer CD investments, loans and services
- Working with non-profits focused on CD activities
- Working with state government agencies focused on affordable housing for lending and investment opportunities.

## Minneapolis-St. Paul-Bloomington, MN-WI MSA

Demographic Information for Full-scope Area: Minneapolis-St Paul-Bloomington MN-WI MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	772	8.42	20.73	45.85	24.48	0.52
Population by Geography	3,279,833	6.36	17.77	49.45	26.30	0.12
Owner-Occupied Housing by Geography	918,062	2.56	14.69	53.41	29.33	0.00
Business by Geography	331,201	4.69	16.66	48.50	30.14	0.02
Farms by Geography	9,124	1.07	12.43	64.26	22.24	0.00
Family Distribution by Income Level	818,942	19.47	18.08	23.76	38.69	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	307,560	10.20	25.22	49.76	14.82	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		80,925 83,900 9 percent	Median Housing Value Unemployment Rate (2010 U.S. Census)		254,202 3.70 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Minneapolis-St. Paul-Bloomington MSA consists of the Minnesota counties of Anoka, Carver, Chisago, Dakota, Hennepin, Isanti, Ramsey, Scott, Sherburne, Washington and Wright, and the Wisconsin counties of Pierce and St. Croix. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Minneapolis, the largest city in Minnesota, is located in Hennepin County, and the state capital, St. Paul, is located in Ramsey County. The AA is a financial services, health care services, and manufacturing oriented city with a growing medical device industry. The MSA population at the 2010 Census was 3,279,833, an increase of 10.5 per cent over 2000. The 2012 MSA population estimate was 3,422,264 as of July 2012 per the Census Bureau. Large numbers of immigrants from Africa, Asia and Central America have contributed to the growing population in the area over the past fifteen years.

Leading segments of the local economy include finance, insurance and real estate, transportation services, health care, computers and technology, education, and government. Major employers include Target Corporation, Allina Health Systems, Fairview Health System, WFB, University of Minnesota, 3M Corp., Health Partners and U.S. Bank N.A. The MSA is also home to many institutions of higher education, which employ many people, contribute significantly to the local economy, and produce a well-educated citizenry that also contributes to the economic development of the region. The largest such institution is the University of Minnesota. Other four-year colleges and universities include the University of St. Thomas, College of Saint Catherine, Augsburg

College, Concordia University, Hamline University, Macalester College, and North Central University.

The HUD-adjusted median family income for 2011 is \$82,700 and increased to \$83,900 for 2012. The poverty rate as of the 2000 Census was 6.3 percent and increased to 9.0 percent as of the 2010 Census. The number of census tracts and families in the AA increased from 746 census tracts in 2000 to 772 in 2010. The population of people living in the low-income tracts in 2010 increased significantly by 54 percent, while the population of people living in the moderate-income tracts increased by 16 percent.

According to the Bureau of Labor Statistics, the average unemployment rate in the AA was 5.1 percent in 2008. The unemployment rate rose significantly to 7.9 percent in 2009 and decreased slightly in 2010 to 7.3 percent. The unemployment rate declined again to 6.4 percent in 2011 and further declined to approximately 5.5 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 0.3 percent in the AA and this decline was less than the national average for the same period.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Minneapolis-St. Paul-Bloomington MSA that affected the demand for loans during the evaluation period.

Challenges exist in lending to low-income families in the Minneapolis-St. Paul-Bloomington MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. Specifically in the Minneapolis-St. Paul-Bloomington MSA, home values declined by more than 1.25 times or higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Minneapolis-St. Paul-Bloomington MSA, we determined that cumulatively, the effect of these factors on demand was moderately severe. We evaluated the bank's lending performance in the Minneapolis-St. Paul-Bloomington MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

The level of opportunity to make CD investments and loans is considered good.

The Minneapolis-St. Paul-Bloomington MSA has many well-established CD organizations operating within its boundaries. The organizations focus on affordable housing development, economic development, homeownership preservation and asset and wealth-building services. The city administrations of Minneapolis and St. Paul work closely with these organizations to develop and carry out redevelopment plans for both cities.

Community contacts indicate that the following are identified needs within the community:

- Homeownership preservation
- Rehabilitation of affordable single-family housing
- Neighborhood stabilization
- Affordable rental housing
- Asset building, and
- Economic development

Opportunities for participation by financial institutions include the following:

- Homeownership preservation.
- Rehabilitation loans and modernization financing for affordable single-family housing.
- Donation of foreclosed homes to non-profit organizations for the preservation of affordable housing
- Participation in asset building programs
- Economic development, and
- Micro-Enterprise Lending

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

### New York-White Plains-Wayne, NY-NJ MD

Demographic Information for Full-scope Area: New York-White Plains-Wayne NY-NJ MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	2,920	11.37	23.46	28.46	34.25	2.47
Population by Geography	11,576,251	12.88	25.24	25.91	35.76	0.21
Owner-Occupied Housing by Geography	1,718,343	2.47	12.25	27.31	57.97	0.00
Business by Geography	1,032,939	7.34	17.18	22.46	50.73	2.30
Farms by Geography	7,656	2.76	9.12	19.20	68.31	0.61
Family Distribution by Income Level	2,675,727	25.67	15.46	16.27	42.61	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	1,100,425	22.97	35.73	25.08	16.22	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,171 68,300 16 percent	Median Housing Value Unemployment Rate (2010 U.S. Census)		509,316 4.15 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The New York-White Plains-Wayne MD is a multistate MD comprising Bronx, Kings, New York, Putnam, Queens, Richmond, Rockland, and Westchester counties in New York, and Bergen, Hudson, and Passaic counties in New Jersey. The AA includes the five boroughs of New York City (NYC). As of June 30, 2012, WFB deposits in the AA comprised approximately 2.4 percent of the total deposits of the bank.

The AA is home to a wide range of businesses of all sizes. Many national and multi-national corporations are headquartered in the AA. The AA is a center for domestic and international finance. Other industries that are prevalent in the AA include media, real estate, international trade, advertising, tourism, biotechnology and entertainment. The region has robust retail, manufacturing and healthcare sectors as well. Major employers in the AA include New York Presbyterian Health Care Center System, Citigroup, Verizon, Columbia University and Federated Department Stores.

Banking competition is very strong with over 173 financial institutions operating almost 3,079 branches in the AA. According to the FDIC's Deposit Market Share Report as of June 30, 2012, WFB is ranked eighth with a 2.2 percent deposit market share. WFB bank has 125 offices in the AA. Major competitors in the AA include JP Morgan Chase, Bank of New York Mellon and Bank of America, NA with deposit market shares of 40.7 percent, 10.0 percent and 7.8 percent, respectively.

Unemployment rates increased significantly in the AA during the review period. The primary driver for the rise in unemployment is due to the recession that affected the entire country. According to the Bureau of Labor Statistics, the AA had a 4.7 percent unemployment rate in 2007. The unemployment rate increased every year until its peak at 9.4 percent in 2010. In 2010, the AA unemployment rate was slightly less than the overall national average, which was 9.6 percent. The AA unemployment rate was also slightly less than New Jersey which was also at 9.6 percent in 2010. In 2010, the unemployment rate in AA was higher than the state of New York, which was 8.4 percent.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the New York-White Plains-Wayne MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.75 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the New York-White Plains-Wayne MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the New York-White Plains-Wayne MD was more than 1.25 times the national average. Additional challenges exist in lending to low-income families in the New York-White Plains-Wayne MD because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the New York-White Plains-Wayne MD indicates that the number of families renting their homes is more than 1.75 times the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the New York-White Plains-Wayne MD were 1.25 times higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the New York-White Plains-Wayne MD, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank’s lending performance in the New York-White Plains-Wayne MD in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Provide support for tax credit programs

- Commercial lending to fund various revitalization projects
- Financing the development of commercial, industrial, and residential units
- Rehabilitate and improve the energy efficiency of the aging housing stock
- Loan to small businesses
- Additional access to financial services (e.g., more branches)
- Financial literacy
- Credit builder loans and products that help people re-establish credit
- Closing cost down payment and assistance grants
- Foreclosure prevention assistance, and
- Programs to assist low- and moderate-income first time homebuyers

Good opportunities exist to make CD investments and loans in the AA. The Association for Neighborhood and Housing Development has 95 non-profit members with a focus on CD, and that represents only a fraction of the organizations in the area. Superstorm Sandy has created additional opportunities as the impacted communities begin rebuilding.

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

### Newark-Union, New Jersey-Pennsylvania MD

Demographic Information for Full-scope Area: Newark-Union NJ-PA MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	503	15.90	25.25	25.25	33.20	0.40
Population by Geography	2,147,727	12.66	23.13	25.33	38.67	0.22
Owner-Occupied Housing by Geography	487,884	3.69	15.23	30.06	51.03	0.00
Business by Geography	188,762	9.46	17.38	25.76	47.13	0.28
Farms by Geography	3,939	2.11	8.33	33.36	56.21	0.00
Family Distribution by Income Level	535,832	22.96	16.69	19.29	41.05	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	212,497	21.80	34.70	23.92	19.57	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		87,598 91,900 9 percent	Median Housing Value Unemployment Rate (2010 U.S. Census)		400,363 4.31 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Newark-Union MD consists of six counties. Five out of six counties are located in New Jersey. The five counties located in New Jersey are Essex, Hunterdon, Morris, Sussex and Union. The one county located in Pennsylvania is Pike County. According to the 2000 U.S. Census, the population of the MD was 2,098,843 people. U.S. Census information for 2010 indicates that the population of the MD increased by 2.3 percent, for a total population of 2,147,727. U.S. Census data for 2000 indicates that there were 539,508 families in the MD. The number of families dropped to 535,832 over the subsequent 10 years according to 2010 U.S. Census information. The main industries providing jobs for the area are professional business services, education and health services and government. Some of the top employers in the MD are Verizon Communications, Merck and Co, and Continental Airlines.

According to the June 30, 2012, FDIC's Summary Deposit Market Share Report, WFB was first in deposit market share. WFB had a deposit market share of 16.2 percent, which accounted for \$12.09 billion in deposits. WFB operates 86 branches in the MD. Primary competition in the AA includes New York Community Bank and Bank of America, NA with deposit market shares of 10.1 percent and 8.0 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing value was \$202,013. The weighted average median housing price increased by 98.2 percent over the subsequent 10 years. U.S. Census information for 2010 indicated the weighted average median housing value was \$400,363. In 2000, 58.0 percent of the 804,576

available housing units were owner-occupied. In 2010, 57.6 percent of the 847,657 available housing units were owner-occupied. According to the Bureau of Labor Statistics, the unemployment rate has been consistent with national averages and the state of New Jersey's overall unemployment rate. In 2010, the AA unemployment rate was 9.4 percent. In 2010, the national and state of New Jersey unemployment rates were 9.6 percent.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Newark-Union MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.5 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Newark-Union MD.

The number of households in the AA that are considered "housing cost-burdened" and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Newark-Union MD was higher than the national average.

The demographic data for the Newark-Union MD indicates that the number of families renting their homes is more than 1.75 times the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. Specifically in the Newark-Union MD, home values declined by more than 1.25 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Newark-Union MD were 1.75 times higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Newark-Union MD, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank's lending performance in the Newark-Union MD in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following CD needs in the MD:

- Financial assistance for those facing foreclosure
- Affordable rental housing
- Light industrial financing, and

- Financial literacy

There are good opportunities for CD in the MD.

## Washington-Arlington-Alexandria DC-VA-MD MD

Demographic Information for Full-scope Area: Washington-Arlington-Alexandria DC-VA-MD MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	1,057	9.84	23.75	35.10	30.18	1.14
Population by Geography	4,323,510	8.81	23.22	36.38	31.35	0.24
Owner-Occupied Housing by Geography	1,009,669	3.79	18.87	40.27	37.07	0.00
Business by Geography	472,503	4.43	18.97	35.94	40.04	0.61
Farms by Geography	6,613	2.57	20.82	40.19	36.35	0.06
Family Distribution by Income Level	992,872	21.15	17.45	21.18	40.22	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	383,237	15.78	34.34	35.18	14.69	0.02
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		100,890 105,700 7 percent	Median Housing Value Unemployment Rate (2010 US Census)		426,618 3.30 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Washington-Arlington-Alexandria MD consists of the following counties: Calvert, Charles, Prince George, Arlington, Clarke, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, Warren, Alexandria City, Fairfax City, Falls Church City, Fredericksburg City, Manassas City, Manassas Park City and the District of Columbia. This AA does not include the portions of the MD that are in West Virginia. According to the 2000 U.S. Census, the population of the AA was 3,685,375 people. The population consisted of 907,361 families. According to the 2010 U.S. Census, population of the AA increased by 17.2 percent. In 2010, the population consisted of 4,233,510 people. The AA's leading employment sectors are government, professional business services and education and health services. Some of the top employers in the AA are Naval Support Activity Washington, University of Maryland at College Park, Inova Health Systems, Booz Allen Hamilton and SAIC Inc.

As of June 30, 2012, WFB is the ranked third in the AA in deposit market share. WFB has an 11.5 percent market share, which totals \$21.96 billion. There are 97 financial institutions in the AA, which operate 1,778 branches. WFB operates 159 branches in the AA, which is sixth in the AA. Primary competitors in the AA are E\*TRADE Bank and Capital One, NA, with deposit market shares of 17.5 percent and 15.1 percent, respectively.

According to the 2000 U.S. Census, the weighted average median house price was \$182,505. The 2010 Census information indicates that weighted average median housing price increased by 133 percent to \$426,618. According to 2000 U.S. Census

information, owner-occupied housing accounted for 58.6 percent of the 1,464,765 housing units. U.S. Census data for 2010 reveals that the percentage of owner-occupied housing units in the AA increased to 59.42 percent of the 1,699,143 housing units. According to Bureau of Labor Statistics data, the unemployment rate in the AA was below national averages throughout the review period. In 2010, the AA unemployment rate was 6.4 percent and the national average was 9.6 percent.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Washington-Arlington-Alexandria MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.25 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Washington-Arlington-Alexandria MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Washington-Arlington-Alexandria MD was higher than the national average.

The demographic data for the Washington-Arlington-Alexandria MD indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. Specifically in the Washington-Arlington-Alexandria MD, home values declined by 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Washington-Arlington-Alexandria MD, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank’s lending performance in the Washington-Arlington-Alexandria MD in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following needs of the AA:

- Affordable housing
- Funding to assist businesses with seasonal cash flow
- Basic banking services, and
- Funding for the construction and renovation of affordable housing

The level of opportunity for CD activities is good. There are numerous non-profit and CD entities serving the area. However, CD lending and investment opportunities statewide in Virginia were constrained by the downturn in the economy. The nonprofit organizations that are the developers on most CD projects throughout the state suffered significant financial hardship when anticipated revenue from federal, state, and local entities was cut back as a result of falling tax revenues. Without the money to cover basic expenses and predevelopment costs, these organizations were unable to create viable lending and investment opportunities at prerecession levels. Although most states were faced with budget shortfalls, the situation was particularly severe in Virginia and the Virginia counties that comprise a significant part of the Washington-Arlington-Alexandria MD.

## State of Arizona

### Phoenix-Mesa-Glendale AZ MSA

Demographic Information for Full-scope Area: Phoenix-Mesa-Glendale AZ MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	991	9.18	24.52	33.91	31.38	1.01
Population by Geography	4,192,887	8.18	24.70	36.00	30.95	0.17
Owner-Occupied Housing by Geography	1,008,811	3.66	21.50	38.06	36.77	0.01
Business by Geography	474,416	6.41	16.12	31.16	45.87	0.45
Farms by Geography	8,614	5.79	18.20	34.46	41.34	0.21
Family Distribution by Income Level	1,000,063	21.18	17.76	20.47	40.59	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	389,428	13.42	36.31	33.84	16.44	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,408 66,400 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		251,130 3.41 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Phoenix-Mesa-Glendale MSA consists of Maricopa and Pinal Counties. As a designated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Maricopa and Pinal County are contiguous and located in the southern half of the state. Maricopa and Pinal Counties do not border any other states. According to the 2000 U.S. Census, the population of the AA was 3,251,876. The 2010 U.S. Census indicates that the population of the AA rose by 28.9 percent over the 10-year period to 4,192,887 people. Some of the major economic sectors are professional business services, healthcare, education and government. The largest employers in the AA are Banner Health Systems, WFB, and Intel Corporation.

As of June 30, 2012, WFB was the largest bank in the AA in deposit market share. WFB had 16.75 billion in deposits for a deposit market share in the AA of 26.6 percent. WFB operated 173 branches in the AA as of June 30, 2012. In total there are 63 financial institutions operating 923 branches in the AA. Primary competition in the AA for deposits comes from JPMorgan Chase and Bank of America, NA with deposit market shares of 26 percent and 20.6 percent, respectively.

According to 2000 U.S. Census information, the weighted average median housing price was \$127,589. U.S. Census information for 2010 indicates that the weighted average median housing value rose 96 percent to \$251,130. U.S. Census data for 2000 indicates that 61 percent of the housing was owner-occupied. U.S. Census data for

2010 indicates that 57.79 percent of the housing was owner-occupied. In 2010, there were 1,331,385 housing units in the AA. Bureau of Labor Statistics reveal that the unemployment rate in the AA was similar to the national average and better than statewide averages throughout the review period. In 2010, the AA unemployment rate was 9.7 percent. National and statewide unemployment rates for the same period were 9.6 percent and 10.4 percent, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Phoenix-Mesa-Glendale MSA that affected the demand for loans during the evaluation period.

Unemployment rates and affordability ratios (the ratio of median home value to median family income) in the Phoenix-Mesa-Glendale MSA were higher than the national average during the evaluation period. These factors caused lower demand for home loans in low - and moderate-income geographies and to low- and moderate-income borrowers in the Phoenix-Mesa-Glendale MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Phoenix-Mesa-Glendale MSA was higher than the national average. Additional challenges exist in lending to low-income families in the Phoenix-Mesa-Glendale MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Phoenix-Mesa-Glendale MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Arizona statewide, including the Phoenix-Mesa-Glendale MSA, the percent of mortgages that were underwater was more than 1.75 times the national average. Specifically in the Phoenix-Mesa-Glendale MSA, home values declined by more than 1.75 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Phoenix-Mesa-Glendale MSA were higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Phoenix-Mesa-Glendale MSA, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank’s lending performance in the Phoenix-Mesa-Glendale MSA in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts in the AA indicated the following are CD needs.

- Financing for affordable housing
- LIHTC investors
- Small business financing, and
- Equity investment in loan programs supporting foreclosure mitigation and stabilization efforts

There is good availability for CD in the AA.

## Tucson, AZ MSA

Demographic Information for Full-scope Area: Tucson AZ MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	241	7.47	26.97	33.61	31.54	0.41
Population by Geography	980,263	7.32	28.83	32.76	30.66	0.42
Owner-Occupied Housing by Geography	246,584	3.46	22.02	37.37	37.15	0.00
Business by Geography	86,830	5.83	25.28	30.05	38.84	0.00
Farms by Geography	1,697	5.30	21.63	35.06	38.01	0.00
Family Distribution by Income Level	237,380	21.62	17.84	19.62	40.92	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	93,685	9.96	40.62	33.16	16.26	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		57,377 60,400 15 percent	Median Housing Value Unemployment Rate (2010 US Census)		209,888 3.76 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Tucson MSA consists of Pima County. As WFB's designated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is located in south Arizona along the international border with Mexico. Pima County does not border any states located in the United States. According to 2000 U.S. Census data, the AA population was 843,746 people. U.S. Census data for 2010 indicated that the population of the AA has risen by 16.2 percent to 980,263. The largest sectors of the AA economy are government, professional business services, education and health. Some of the largest employers in the AA are U.S. Army Intelligence Center at Fort Huachuca, University of Arizona, Raytheon Missile Systems, Wal-Mart and UA Healthcare.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB was ranked first in deposit market share in the AA. WFB has a 28.0 percent market share, which totals \$3.39 billion. WFB has the second most branches in the AA with 40. Overall, there are 18 deposit-taking financial institutions with 196 branches in the AA. The largest competitors in the AA are JPMorgan Chase and Bank of America, NA, with deposit market shares of 23.0 percent and 15.5 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing value was \$111,290. U.S. Census information for 2010 indicates that the weighted average median housing value increased by 88.6 percent to \$209,888. U.S. Census information for 2000 indicates that 58.3 percent of the available housing units were owner-occupied. Census information for 2010 indicates that 56.6 percent of the 435,392 housing units were owner-occupied. Bureau of Labor Statistics information indicates the unemployment rate

in the AA was less than national and statewide averages throughout the review period. In 2010, the AA unemployment rate was 9.4 percent. National and statewide unemployment averages were 9.6 and 10.5 percent, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Tucson MSA that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Tucson MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Tucson MSA was higher than the national average. Additional challenges exist in lending to low-income families in the Tucson MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Tucson MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Arizona statewide, including the Tucson MSA, the percent of mortgages that were underwater was more than 1.75 times the national average. Specifically in the Tucson MSA, home values declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Tucson MSA, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank’s lending performance in the Tucson MSA in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following CD needs in the AA:

- Neighborhood stabilization, driven by the acquisition and rehabilitation of affordable single-family housing
- Permanent, supportive, affordable multifamily housing, specifically for special needs population
- Jobs, driven by access to capital for small businesses and workforce development to close a skills gap, and

- Financial education and training, as well as other forms of education, specifically for low- and moderate-income individuals

There is an adequate level of CD opportunities in the Tucson AA.

## State of California

### Fresno, CA MSA

Demographic Information for Full-scope Area: Fresno CA MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	199	11.06	28.14	25.63	34.17	1.01
Population by Geography	930,450	10.89	29.44	27.63	31.29	0.74
Owner-Occupied Housing by Geography	156,132	4.95	20.81	27.75	46.49	0.00
Business by Geography	60,260	9.72	23.86	26.34	39.95	0.13
Farms by Geography	3,925	4.64	30.80	34.75	29.78	0.03
Family Distribution by Income Level	205,821	24.70	16.04	17.13	42.13	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	83,858	17.29	40.18	27.00	15.53	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		52,306 55,500 19 percent	Median Housing Value Unemployment Rate (2010 US Census)		249,443 5.10 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Fresno MSA consists of Fresno County. As WFB's designated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Fresno MSA is located centrally in California along a transportation corridor known as the Grapevine. Fresno County is surrounded by eight different counties all of which are landlocked except for Monterey County. According to the 2000 U.S. Census, the Fresno MSA had a population of 799,407. According to the 2010 U.S. Census, the AA population has increased approximately 16 percent to 930,450 people. The 2000 U.S. Census indicated the population of the AA consisted on 188,489 families. The 2010 U.S. Census indicates there was an approximately 9.2 percent increase to 205,821 families. Fresno's economy has a large agriculture component. Additionally, its central location and affordable real estate attracts large warehousing, transportation and shipping companies. Fresno's economy also has large government and health care employers. Some of the largest employers in the AA are California State University Fresno, Community Medical Center, Kaiser Permanente and Wawona Frozen Foods.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB is ranked first in the MSA in deposit market share. WFB has a deposit market share of 24.2 percent, which totals 2.47 billion. WFB ranks second in the number of branches in the AA with 16. The AA has 25 deposit-taking institutions that operate 151 branches. Some of the other largest banks in terms of deposit market share are Bank of America, NA, Bank of the West and Union Bank of California with 16.4 percent, 8.5 percent and 6.8 percent, respectively.

According to 2000 U.S. Census data, the average median house value was \$105,378. Housing prices have increased significantly over the subsequent 10 years. According to the 2010 U.S. Census, the average median housing price was \$249,443. This represents a 236 percent increase in housing prices over the 10-year period. According to the Bureau of Labor Statistics, Fresno's unemployment rate has been higher than statewide and national averages throughout the review period.

The AA unemployment rate has increased every year since 2006 when it was at 8 percent and peaked in 2010 at 16.9 percent. The unemployment rate dropped slightly in 2011 to 16.5 percent. In 2011 national and statewide unemployment rates were 8.9 percent and 11.8 percent, respectively. HUD data indicates that the median family income has stayed stagnant over the 10-year period beginning in 2000. In 2000, the weighted average HUD median family income was \$54,700 and increased to \$55,500 according to 2010 HUD data.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Fresno MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was more than 1.75 times the national average, the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers was affected by the high cost of housing as evidenced by an affordability index (the ratio of median home value to median family income) for homes in the Fresno MSA that was 1.25 times higher than the national average.

Demand was also affected by the number of households in the AA that are considered "housing cost-burdened" and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage. The number of housing cost-burdened households in the Fresno MSA is higher than the national average as well. Additional challenges exist in lending to low-income families in the Fresno MSA because the percent of low-income families with incomes below the poverty rate is more than 1.5 times the national average.

The demographic data for the Fresno MSA indicates that the number of families renting their homes is more than 1.5 times the national average. A significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages, (mortgages where the loan amount exceeded the value of the home); have reduced demand for refinance loans. For California statewide, the percent of mortgages that were underwater was higher than the national average. In addition, home values in the Fresno MSA declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Fresno MSA, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank's lending performance in the Fresno MSA in light of

these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts during the evaluation period indicated the need for capacity building to develop local CD organizations and intermediaries to address the issues that undocumented farm workers and low- and moderate-income individuals and families face as a result of economic extremes in the area,

The need for training on CD products such as LIHTCs and NMTCs to build capacity and support the development of local CD organizations and intermediaries was also identified.

Community contacts identified the need for the following:

- Foreclosure prevention and neighborhood stabilization,
- Workforce development,
- Small business economic development, and
- Financial education

Opportunities for CD lending, investments and services in the Fresno MSA are limited. However, the needs are significant.

CD lending and investment opportunities state-wide were further constrained by the downturn in the economy and the collapse of the housing market, which caused significant challenges in certain areas for funding of new affordable housing and LIHTC projects due to high vacancies and struggling real estate markets. Demand was low because of falling rental rates. Subsidies from state and local governments were decreasing due to budget constraints. Lending and investment activity by banks decreased due to low- or no-cost federal stimulus money that replaced the need for construction lending and displaced private funding. This resulted in lost opportunities for affordable housing lending and investment. States allocated fewer tax credit awards, reducing the amount of tax credit equity available to finance projects.

The economic downturn in California created a fiscal crisis resulting in the downgrade of the state's debt rating. This affected the Multifamily Housing Program, a traditional source of permanent financing for affordable housing transactions. Because of state budget issues, these bonds became less predictable, making banks unable or unwilling to provide any additional affordable housing construction lending. As a result, affordable housing projects were stalled.

In 2011, the process to discontinue California Redevelopment Agencies began and as of February 1, 2012, they were officially dissolved. This resulted in a loss of \$1 billion in subsidies critical to affordable housing developments. The California Tax Credit Allocation Committee responded by allowing more time for projects with subsidies to find alternative sources of financing.

In the Direct Equity area, in conjunction with recent federal stimulus packages, exchange money and Tax Credit Assistance Programs (TCAP) were established. As part of the American Recovery and Reinvestment Act of 2009, \$2.25 billion was appropriated for the TCAP program to provide grants for capital investments in stalled LIHTC projects. The program essentially swapped tax credit funding for direct federal money under more favorable economic conditions, effectively supplanting private tax credit investment opportunities for financial institutions with public sector funds. Because the purpose of the fund was to immediately create or save jobs, there was a February 2012 deadline for commitment and expenditure of the TCAP funds. Funds were allocated to state housing agencies. California received the largest allocation of funds at \$326 million. In addition to TCAP, the Tax Credit Exchange Program (TCEP) allowed state housing agencies to receive grants in lieu of the low-income housing tax credits that they otherwise would have received. This program applied to each state's 2009 LIHTC allocation. More than \$4 billion in TCEP funds were provided to help develop affordable housing by allowing states to exchange tax credits for cash. Texas received the largest amount of TCEP funds at \$594 million. Florida received the second largest amount at \$579 million and California was third at \$478 million. Combined, the TCAP and TCEP programs had the effect of removing over \$2.2 billion of potential LIHTC funding opportunities in just those three states during the exam period.

## Los Angeles-Long Beach-Glendale, CA MD

Demographic Information for Full-scope Area: Los Angeles-Long Beach-Glendale CA MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	2,346	8.99	28.64	26.77	34.02	1.58
Population by Geography	9,818,605	8.01	29.43	28.26	33.92	0.39
Owner-Occupied Housing by Geography	1,552,091	2.13	16.61	28.64	52.61	0.01
Business by Geography	996,037	6.35	18.50	25.29	48.70	1.15
Farms by Geography	8,432	3.36	17.10	26.94	51.94	0.65
Family Distribution by Income Level	2,170,227	24.05	16.43	17.64	41.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	878,478	13.64	41.84	26.84	17.67	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		61,622 64,800 14 percent	Median Housing Value Unemployment Rate (2010 US Census)	526,439 4.39 percent		

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Los Angeles-Long Beach-Glendale MD is comprised of Los Angeles County, a diverse urban area that includes more than 80 cities and a number of unincorporated areas. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Los Angeles County is bordered by Ventura County, San Bernardino County, Orange County, and the Pacific Ocean. It is the most populous county in the State of California with more than 10.0 million residents as of 2012, an increase of 144,000 since the 2010 Census. Los Angeles and Long Beach are home to the two busiest ports in the country and international trade is an important driver to the Los Angeles economy. In addition to the trade sectors, leading industries include government, professional/business services, health and education services, hospitality services, and manufacturing. Within the county, motion picture and video industries, financial services, and real estate are also major employment trades. Major employers include Kaiser Permanente, Northrop Grumman Corporation, and Bank of America. Los Angeles County has several federal and state designations aimed at stimulating economic development including Renewal Community, Empowerment Zone, and Enterprise Zones.

As of June 30, 2012, there are 150 financial institutions with branch operations in Los Angeles County. According to the FDIC's Deposit Market Share Report, Bank of America, NA is the number one institution in the county with 17.2 percent of the deposit market share, followed by WFB and Union Bank of California with 16.6 percent and 10.5 percent market shares respectively. WFB has deposits of \$57.2 billion distributed in 349 branches in Los Angeles County.

The HUD-adjusted median family income for 2011 is \$64,000 and increased to \$64,800 for 2012. The poverty rate as of the 2000 Census was 15 percent and declined slightly to 14 percent as of the 2010 Census. While the number of census tracts and families in Los Angeles County increased between the 2000 and 2010 Censuses, the distribution of tracts or families among the different income categories remained similar.

According to the Bureau of Labor Statistics, the average unemployment rate was 7.5 percent in 2008 and rose significantly to 11.6 percent in 2009. The average annual unemployment rate exceeded 12 percent in 2010 and 2011 but declined to 10.9 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 1.2 percent in Los Angeles County and this decline was 1.8 times more than the national average for the same period.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Los Angeles-Long Beach-Glendale MD that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was more than 1.25 times the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was 1.25 times higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Los Angeles-Long Beach-Glendale MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Los Angeles-Long Beach-Glendale MD is more than 1.25 times the national average. Additional challenges exist in lending to low-income families in the Los Angeles-Long Beach-Glendale MD because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Los Angeles-Long Beach-Glendale MD indicates that the number of families renting their homes is more than 1.75 times the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For California statewide including the Los Angeles-Long Beach-Glendale MD, the percent of mortgages that were underwater was higher than the national average. Specifically in the Los Angeles-Long Beach-Glendale MD, home values declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Los Angeles-Long

Beach-Glendale MD, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank's lending performance in the Los Angeles-Long Beach-Glendale MD in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts indicate that the following are identified needs within the community:

- Affordable housing
- Small business financing including micro loans
- Multi-family housing that can accommodate large families
- Financial services; particularly branches in the unbanked and under-banked communities in the AA
- Foreclosure prevention counseling
- Job training/work force development, and
- Basic literacy and education skills

The level of opportunity to make CD investments and loans was severely restricted during the evaluation period. See the Fresno MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of California including the Los Angeles-Long Beach-Glendale MD.

## Oakland-Fremont-Hayward, CA MD

Demographic Information for Full-scope Area: Oakland-Fremont-Hayward CA MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	567	13.76	21.34	33.33	31.39	0.18
Population by Geography	2,559,296	12.53	20.80	34.45	32.23	0.00
Owner-Occupied Housing by Geography	549,084	5.73	15.64	36.39	42.23	0.00
Business by Geography	240,920	10.37	18.08	32.01	39.52	0.02
Farms by Geography	3,408	7.83	16.90	33.92	41.31	0.03
Family Distribution by Income Level	599,692	23.31	16.42	19.15	41.12	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	238,260	20.56	28.33	34.11	17.00	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		88,024 93,500 10 percent	Median Housing Value Unemployment Rate (2010 US Census)		551,319 4.29 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Oakland-Fremont-Hayward MD consists of the entire Alameda and Contra Costa Counties. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Alameda and Contra Costa counties are located on the east side of the San Francisco Bay. Contra Costa County is directly north of Alameda County. This MD is located north of Santa Clara County and west of San Joaquin County. The MD's northern border touches Sacramento and Solano Counties. The San Francisco Bay is directly west of this MD and borders most of the AA. According to the 2000 U.S. Census the population of this MD was 2,393,577. U.S. Census information for 2010 indicates the population of the AA has had an increase of approximately 7 percent to 2,559,296. Some of the largest employment sectors are government, professional business services, education and healthcare. Major employers in the area are Kaiser Permanente, University of California Berkeley and Safeway Inc. The area has a robust road system, public transportation and an airport.

According to the FDIC Deposit Market Share Report, as of June 30, 2012, WFB is ranked first in deposit market share and has the most bank branches in the AA. WFB has a total deposit market share of 30.0 percent that totaled approximately \$17.7 billion. WFB operated 81 bank branches in the AA as of June 30, 2012. Other banks with significant market share in the AA include Bank of America, NA Bank of the West and JPMorgan Chase with respective market shares of 16.4 percent, 10.9 percent and 10.0 percent. There are 51 deposit-taking institutions in the AA with a total of 527 bank branches.

According to the 2000 U.S. Census, the average median house was \$289,834 in the AA. The 2010 U.S. Census indicates that average median house value increased 92 percent to \$551,319. Unemployment in the AA has increased during the review period. According to the Bureau of Labor Statistics, the unemployment rate was 6.2 percent in 2008 and increased until its peak in 2010 at 11.2 percent. Throughout the review period the unemployment rate in the AA has been slightly better than California overall, which hit a peak in 2010 at 12.3 percent. Nationally the unemployment rate has been lower than the AA throughout the review period. In 2010, the national unemployment rate was 9.6 percent.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Oakland-Fremont-Hayward MD that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.75 times higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Oakland-Fremont-Hayward MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Oakland-Fremont-Hayward MD is more than 1.25 times the national average. Additional challenges exist in lending to low-income families in the Oakland-Fremont-Hayward MD because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Oakland-Fremont-Hayward MD indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages, (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For California statewide including the Oakland-Fremont-Hayward MD, the percent of mortgages that were underwater was higher than the national average. Specifically in the Oakland-Fremont-Hayward MD, home values declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Oakland-Fremont-Hayward MD, we determined that cumulatively, the effect of these factors on demand was moderately severe. We evaluated the bank’s lending performance in the Oakland-Fremont-Hayward MD in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Improve public facilities and services
- Expand economic opportunities for low income households
- Affordable housing for large families
- Low-cost bank accounts
- Financial literacy, and
- Increase and maintain the supply of affordable supportive housing for low-income and special needs populations.

The level of opportunity to make CD investments and loans was severely restricted during the evaluation period. See the Fresno MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of California including the Oakland-Fremont-Hayward MD.

## Riverside-San Bernardino-Ontario, CA MSA

Demographic Information for Full-scope Area: Riverside-San Bernardino-Ontario CA MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	822	5.72	28.22	35.89	29.56	0.61
Population by Geography	4,224,851	5.71	26.45	35.43	32.09	0.32
Owner-Occupied Housing by Geography	855,253	2.87	21.60	36.29	39.24	0.00
Business by Geography	309,790	4.30	24.16	34.53	36.95	0.06
Farms by Geography	6,002	3.80	23.69	35.39	37.10	0.02
Family Distribution by Income Level	949,542	21.83	17.53	19.81	40.84	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	373,693	9.87	38.84	34.83	16.46	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		63,176 63,300 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		317,566 5.03 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Riverside-San Bernardino-Ontario MSA is comprised of Riverside and San Bernardino Counties. The area is known as the “Inland Empire or IE”. As WFB’s delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is situated directly east of Orange and Los Angeles Counties and extends east to the Arizona Border. The AA is directly north of San Diego and Imperial counties. The entire AA is greater than 27,000 square miles. The AA is the third most populated metropolitan area in California and 12<sup>th</sup> most populous metropolitan area in the entire country. The 2010 census indicates that over 4.2 million people reside within the AA. Cheap land prices and access to various types of transportation have made parts of the AA a hub for the transportation of goods. Prior to the 2007 recession, the AA saw a dramatic increase in population due to its proximity to the Southern California economy and affordable housing. Housing prices in the area were hit hard during the recession. According to the California Association of Realtors, housing values fell 37.5 percent and 40.3 percent in Riverside and San Bernardino counties from 2007-2008.

The AA’s leading industries are state and local government, retail trade and health and education services. The AA area main employers are Stater Brothers Markets, U.S. Marine Corps Air and Ground Combat Center, Fort Irwin, Loma Linda University and Wal-Mart. The 2011 HUD median family income was \$62,500. According to the Bureau of Labor Statistics, unemployment in the AA peaked at 14.4 percent in 2010. This was significantly higher than both the state of California and national average that were 12.3 percent and 9.6 percent, respectively.

As of June 30, 2012, there were 59 financial institutions the AA with 601 branches. According to the FDIC's Deposit Market Share Report, WFB is the second largest deposit-taking institution with a total of \$6.89 billion in deposits, which accounts for a 19.0 percent market share. WFB operated 91 branches in the AA. Bank of America, NA is has the largest market share in the AA with 19.7 percent. JPMorgan Chase and US Bank follow WFB's deposit market share with 11.9 percent and 7.6 percent, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Riverside-San Bernardino-Ontario MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was more than 1.25 times the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was 1.5 times higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Riverside-San Bernardino-Ontario MSA.

The number of households in the AA that are considered "housing cost-burdened" and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Riverside-San Bernardino-Ontario MSA is more than 1.25 times higher than the national average. Additional challenges exist in lending to low-income families in the Riverside-San Bernardino-Ontario MSA because the percent of low-income families with incomes below the poverty rate is more than higher than the national average.

The demographic data for the Riverside-San Bernardino-Ontario MSA indicates that the number of families renting their homes is higher than national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For California statewide including the Riverside-San Bernardino-Ontario MSA, the percent of mortgages that were underwater was higher than the national average. Specifically in the Riverside-San Bernardino-Ontario MSA, home values declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Riverside-San Bernardino-Ontario MSA, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank's lending performance in the Riverside-San Bernardino-Ontario MSA in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- CD organizations-no national intermediary presence with the exception of NeighborWorks® America organizations in Ontario and San Bernardino.
- Funding for housing and consumer counseling organizations
- Funding and volunteers from financial institutions for financial literacy efforts, and
- Lending for first time homebuyers and smaller multi-family developments

Contacts also identified the following opportunity in the AA:

- Leadership opportunities in banker collaboratives
- Support for small business collaboratives
- Support for financial literacy collaboratives
- Lending opportunities for prospective homebuyers and nonprofit developers, and
- Volunteer opportunities

The level of opportunity to make CD investments and loans was severely restricted during the evaluation period. See the Fresno MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of California including the Riverside-San Bernardino-Ontario MSA.

## San Francisco-San Mateo-Redwood City, CA MD

Demographic Information for Full-scope Area: San Francisco-San Mateo-Redwood City CA MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	411	11.44	18.25	35.28	33.33	1.70
Population by Geography	1,776,095	11.07	19.31	37.59	31.74	0.28
Owner-Occupied Housing by Geography	347,897	3.41	14.46	39.92	42.21	0.00
Business by Geography	227,486	16.12	13.01	30.46	40.29	0.11
Farms by Geography	2,671	9.32	13.74	34.86	42.04	0.04
Family Distribution by Income Level	385,087	23.97	16.18	18.63	41.22	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	154,617	16.53	27.13	36.99	19.34	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		97,831 103,000 9 percent	Median Housing Value Unemployment Rate (2010 US Census)		776,431 3.76 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The San Francisco-San Mateo-Redwood City MD consists of the entire San Francisco, Marin, and San Mateo Counties. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. San Mateo County is located directly south of San Francisco County. Marin County is directly north of San Francisco County and is connected to San Francisco County by the Golden Gate Bridge. All counties have the Pacific Ocean as their western border. Additionally, all counties eastern borders are adjacent to the San Francisco Bay. San Mateo County is located directly north of Santa Cruz County. Marin County is directly south of Sonoma County. The MD has sufficient roadways, bridges, and airports to allow for commerce. The 2000 U.S. Census indicated the population of the MD was 1,731,183 persons, which is comprised of 381,072 families. There has been a modest growth in the population of the MD. According to 2010 U.S. Census information there 1,775,095 persons, which comprise 385,087 families. The MD has a robust economy and one of the highest HUD adjusted median family incomes in the country. The 2011 HUD adjusted median family income was \$101,600. Professional business services, leisure, hospitality, and government are the largest sectors for employment in the MD. The MD is also located nearby Silicon Valley and has a robust technology sector, which creates many high paying jobs for residents of the MD.

According to the FDIC Deposit Market Share Report as June 30, 2012, WFB is ranked second in deposit market share in the MD. WFB has a total deposit market share of 15.2 percent in the MD. WFB has the most branches in the MD with 70. Deposits in the MD totaled \$33.6 billion. Bank of America, NA is the only bank ranked ahead of WFB in deposit market with \$119.2 billion and a 53.7 percent market share. Other banks with a

significant deposit market share are Citibank, First Republic Bank and Union Bank with market shares 6.8 percent, 4.6 percent, and 2.3 percent respectively. There are 58 deposit-taking institutions in the MD with 447 branches.

According to the 2000 U.S. Census the median average housing value was \$501,526. This has increased significantly when compared to the 2010 Census information that indicates the median average housing value was \$776,431. Unemployment in the MD has increased overall throughout the review period. According to the Bureau of Labor Statistics, the unemployment rate was 5 percent in 2008 and peaked in 2010 at 9 percent. Although the MD has seen an increase in unemployment, it has been less than national and statewide average throughout the review period.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the San Francisco-San Mateo-Redwood City MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.5 times higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the San Francisco-San Mateo-Redwood City MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the San Francisco-San Mateo-Redwood City MD is higher than the national average.

The demographic data for the San Francisco-San Mateo-Redwood City MD indicates that the number of families renting their homes is more than 1.25 times higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For California statewide including the San Francisco-San Mateo-Redwood City MD, the percent of mortgages that were underwater was higher than the national average. Specifically in the San Francisco-San Mateo-Redwood City MD, home values declined by more than 1.5 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the San Francisco-San Mateo-Redwood City MD, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank’s lending performance in the San Francisco-San Mateo-Redwood City MD in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Affordable housing
- Small business access to credit
- Financial counseling
- Support of non-profit organizations addressing homeownership preservation
- Foreclosure prevention and mitigation and disposition of foreclosed properties, and
- Support for programs that help create jobs and technical assistance to small businesses

The level of opportunity to make CD investments and loans was severely restricted during the evaluation period. See the Fresno MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of California including the San Francisco-San Mateo-Redwood City MD.

## Santa Ana-Anaheim-Irvine, CA MD

Demographic Information for Full-scope Area: Santa Ana-Anaheim-Irvine CA MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	583	5.83	26.24	32.76	34.48	0.69
Population by Geography	3,010,232	6.49	29.75	31.47	32.28	0.02
Owner-Occupied Housing by Geography	599,032	2.99	19.61	33.21	44.19	0.00
Business by Geography	356,845	4.63	25.52	32.57	36.33	0.96
Farms by Geography	3,890	4.22	25.99	32.90	36.30	0.59
Family Distribution by Income Level	699,333	22.02	17.33	19.49	41.16	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	275,193	10.52	39.87	30.55	19.07	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		83,735 85,300 9 percent	Median Housing Value Unemployment Rate (2010 US Census)		598,487 3.81 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Santa Ana-Anaheim-Irvine MD includes the entire Orange County, which includes 34 incorporated cities, two national protected areas and several unincorporated areas. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is most famous for tourism, with attractions such as Disneyland, Knott's Berry Farm, and several beaches spanning over 40 miles of coastline. Based on 2010 U.S. Census data. Orange County is the third most populous county in California, behind Los Angeles County and San Diego County. It is the sixth most populous county in the United States as of 2009. The AA is home to John Wayne Airport and in close proximity to LAX. According to the 2010 U.S. Census, Orange County has a population of 3,010,237 people. This is a moderate increase from the 2000 Census when Orange County had 2,846,289 people.

The economy in Orange County is highly diverse. Main industries include aerospace and electronics manufacturing, computer-related technology engineering and manufacturing, international trade, financial services, and convention and tourism. Household income in the county is among the highest in the nation, which supports a large retailing and local services sector. In addition, a number of large companies have established their headquarters offices in the AA. Large employers in Orange County include Walt Disney Company, the University of California at Irvine, Boeing, St. Joseph Health System, and Albertsons.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB was first in market share for deposits in the AA with a 21.7 percent market share. WFB operates 106 branch locations in the AA. There were 94 deposit-taking institutions in Orange

County. The next largest banks in terms in deposit market share in the AA are Bank of America, NA, JPMorgan Chase, and Union Bank with 18.4 percent, 10.0 percent, and 6.0 percent, respectively.

The unemployment rate in the AA was significantly higher in 2011 as compared to 2008. This is due to the national economic recession that began in 2007. Unemployment in the AA peaked in 2010 at 9.5 percent. This compared favorably to the overall California and national unemployment levels, which were 12.3 percent and 9.6 percent respectively. Based on 2000 Census, the median housing value in Orange County was \$275,476. Per the 2010 Census, the median housing value significantly increased to \$598,487. Per the 2010 Census, the median housing value in low- and moderate-income tracts is \$385,319 and \$448,612, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Santa Ana-Anaheim-Irvine MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was 1.75 times higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Santa Ana-Anaheim-Irvine MD

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Santa Ana-Anaheim-Irvine MD was more than 1.25 times the national average.

The demographic data for the Santa Ana-Anaheim-Irvine MD indicates that the number of families renting their homes is more than 1.25 times the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For California statewide including the Santa Ana-Anaheim-Irvine MD, the percent of mortgages that were underwater was higher than the national average. Specifically, in the Santa Ana-Anaheim-Irvine MD, home values declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Santa Ana-Anaheim-Irvine MD, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank’s lending performance in the Santa Ana-Anaheim-Irvine MD in

light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following CD needs in the AA:

- Programs to facilitate the sale of foreclosed properties to municipalities and nonprofits that would, in turn, provide them to first-time homebuyers and families with real commitments to communities rather than to investors who are perceived to be land-banking properties for eventual sale
- There is a tremendous demand for rental properties-single family and multifamily. low- and moderate-income individuals and families are being pushed out of affordable rentals by middle-income renters
- Small dollar loans as an alternative to payday lenders, and
- Investments in CDC and CDFI loan pools or providing grants to assist their operations to facilitate small business lending.

The level of opportunity to make CD investments and loans was severely restricted during the evaluation period. See the Fresno MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of California including the Santa Ana-Anaheim-Irvine MD.

## State of Colorado

### Denver-Aurora-Broomfield, CO MSA

Demographic Information for Full-scope Area: Denver-Aurora-Broomfield CO MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	621	11.11	22.54	33.49	31.72	1.13
Population by Geography	2,543,482	11.14	23.08	33.37	32.36	0.04
Owner-Occupied Housing by Geography	650,428	6.31	19.13	36.08	38.48	0.00
Business by Geography	344,860	8.25	20.17	31.62	39.67	0.29
Farms by Geography	6,068	6.05	17.78	36.35	39.77	0.05
Family Distribution by Income Level	620,203	21.90	17.14	20.30	40.66	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	242,175	19.33	34.13	30.34	16.20	0.00
Median Family Income HUD Adjusted Median Family Income for 2012		75,101 79,300 11 percent	Median Housing Value Unemployment Rate (2010 US Census)		266,191 3.72 percent	
Households Below Poverty Level						

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Denver-Aurora-Broomfield MSA consists of 10 contiguous counties. The counties that make up the AA are Adams, Arapahoe, Broomfield, Clear Creek, Denver, Douglas, Elbert, Gilpin, Jefferson, and Park. The AA is located in Central part of the state. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas.

According to the 2000 U.S. Census, the population of the AA was 2,179,240 people. The population increased over the course of the next 10 years by 16.7 percent, for a total population of 2,543,482. According to the 2000 U.S. Census, there were 550,797 families in the AA. The 2010 U.S. Census indicates that the number of families in the AA increased to 620,203. Some of the largest employment sectors in the AA are professional business services, government, health, and education. The largest employers in the AA are HealthONE, Exempla Healthcare, Lockheed Martin Corp, CenturyLink and Comcast Corporation.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB has the largest deposit market share in the AA with 27.4 percent of all deposits. WFB operates 83 branches in the AA. Primary competition in the AA includes First Bank and US Bank, with deposit market shares of 13.0 percent and 12.5 percent, respectively.

According to the 2000 U.S. Census, the AA weighted average median housing value was \$180,045. U.S. Census information for 2010 indicated the weighted average median housing value increased 47.9 percent, which totaled \$266,191. U.S. Census information for 2000 indicates that 64.0 percent of the 891,040 housing units were owner-occupied. In 2010, 61.2 percent of the 1,062,074 housing units were owner-occupied. In 2000, the weighted average median family income was \$64,753. The 2010-weighted average median family income was \$80,013. According to the Bureau of Labor Statistics, the unemployment rate in the AA was consistent with statewide averages and less than national averages throughout the review period. In 2010, the AA unemployment rate was 9.1 percent in the AA. Statewide and national unemployment rates in 2010 were 9.0 percent and 9.6 percent respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Denver-Aurora-Broomfield MSA that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Denver-Aurora-Broomfield MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Denver-Aurora-Broomfield MSA was higher than the national average. Additional challenges exist in lending to low-income families in the Denver-Aurora-Broomfield MSA because the percent of low-income families with incomes below the poverty rate is than the national average.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Colorado statewide, including the Denver-Aurora-Broomfield MSA, the percent of mortgages that were underwater was higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Denver-Aurora-Broomfield MSA, we determined that cumulatively, the effect of these factors on demand was moderately severe to severe. We evaluated the bank’s lending performance in the Denver-Aurora-Broomfield MSA in light of these moderately severe to severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following CD needs in the AA:

- Affordable housing
- Foreclosure prevention
- Funding for multi-family houses, and

- Homeownership counseling for low- and moderate-income households

There are numerous opportunities for CD in the AA.

## State of Florida

### Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD

Demographic Information for Full-scope Area: Ft Lauderdale-Pompano-Deerfield Beach FL MD 2000						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	199	6.53	30.65	33.17	29.65	0.00
Population by Geography	1,053,114	5.44	32.75	33.88	27.93	0.00
Owner-Occupied Housing by Geography	269,058	2.05	29.58	36.87	31.50	0.00
Business by Geography	194,714	4.23	26.66	31.22	37.89	0.00
Farms by Geography	2,881	4.48	31.24	28.67	35.61	0.00
Family Distribution by Income Level	254,942	23.22	17.92	19.42	39.44	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	104,890	9.62	44.73	31.68	13.96	0.00
Median Family Income HUD Adjusted Median Family Income for 2012		62,619 62,600 13 percent	Median Housing Value Unemployment Rate (2010 US Census)		259,965 5.11 percent	
Households Below Poverty Level						

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Fort Lauderdale-Pompano Beach-Deerfield Beach MD consists of all the census tracts of Broward County, FL. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Broward County is bordered by Palm Beach County to the north, by the Atlantic Ocean to the east, by Miami-Dade County to the south, and by Collier County to the West. Some of the largest cities include Fort Lauderdale, Hollywood, and Coral Springs. The eastern portion of the county is primarily urban while the western portion is rural. The far western section of the county consists of the Big Cypress Seminole Reservation and the Miccosukee Indian reservation. The AA is a resort and tourist-oriented city with a growing medical industry. The MSA population at the 2010 Census was 1,748,066, an increase of 4.7 per cent over 2000. The 2012 MSA population estimate was 1,815,137 as of July 2012 per the Census Bureau.

Leading industries include professional and business services, retail trade, education and health services, government, and leisure and hospitality services. Major employers include Tenet Health Care Corporation, HCA East Florida Division Office, Memorial Healthcare System, Broward Health, American Express, Comcast, The Continental Group, and Nova Southeastern University.

The HUD-adjusted median family income for 2011 is \$61,800 and increased to \$62,600 for 2012. The poverty rate as of the 2000 Census was 10.8 percent and increased to

11.8 percent as of the 2010 Census. The number of census tracts and families in Broward County increased from 279 census tracts in 2000 to 361 in 2010. The populations of people living in the low-income tracts in 2010 increased by 25 percent while the populations of people living in the moderate-income tracts increased by 18 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 5.4 percent in 2008. The unemployment rate rose significantly to 9.0 percent in 2009 and rose again in 2010 to 9.6 percent. The average annual unemployment rate declined slightly to 8.9 percent in 2011 and further declined to approximately 7.4 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 1.5 percent in Broward County and this decline was slightly better than the national average for the same period. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.25 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD was more than 1.25 times the national average.

The demographic data for the Fort Lauderdale-Pompano Beach-Deerfield Beach MD indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Florida statewide, including the MD, the percent of mortgages that were underwater was more than 1.5 times the national average. Specifically in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, home values declined by more than 1.75 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD were more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank's lending performance in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

### CD Lending

Nonprofit organizations in Florida have struggled financially during the recent economic downturn due to government cutbacks at the federal, state, and local level, in addition to declining support from donors.

There was a drastic reduction in the number of affordable housing developments constructed in Florida during the exam period as a result of the Florida Housing Finance Corporation halting the allocation of competitive 9% federal Low Income Housing Tax Credits during 2010 and 2011. Additionally, funding for several state affordable housing programs, including the Predevelopment Loan Program, the State Apartment Incentive Loan program, and the State Housing Initiatives Partnership Program (SHIP) were not funded through the state budget, thereby eliminating critical subsidies necessary for the development and preservation of multifamily affordable housing.

### Community Development Investments

As noted above there were a limited number of affordable housing developments constructed during the exam period as a result of the Florida Housing Finance Corporation halting the allocation of tax credits during 2010 and 2011. Additionally, the SHIP statewide program did not receive funding between 2009 and 2011. The funding from SHIP is critical to the construction of affordable housing developments.

Also during this exam period in Florida there was a substantial decrease in mortgage volume, resulting in a lower volume of mortgage backed security investments. The limited number of qualified community development investments has resulted in a high level of competition, particularly in major markets throughout Florida. This is especially true in the West Palm Beach and Tampa assessment areas. Additionally, because WFB cannot receive CRA credit for investments in MBS purchases backed by WFB-originated mortgages, WFB's dominance in the market is reduced by the limited opportunities for CRA qualified investments.

Community contacts indicate that the following are identified needs within the community:

- Affordable rental housing
- Homeownership preservation
- Rehabilitation of affordable single-family housing
- Neighborhood stabilization
- Asset building, and
- Economic development

Opportunities for participation by financial institutions include the following:

- Rehabilitation loans and modernization financing for affordable housing.
- Homeownership preservation.
- Donation of foreclosed homes to non-profit organizations for the preservation of affordable housing
- Participation in asset building programs, and
- Economic development

## Miami-Miami Beach-Kendall, FL MD

Demographic Information for Full-scope Area: Miami-Miami Beach-Kendall FL MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	518	5.98	25.48	32.05	33.20	3.28
Population by Geography	2,496,435	5.06	26.89	34.46	33.01	0.58
Owner-Occupied Housing by Geography	480,532	1.67	19.87	35.55	42.90	0.01
Business by Geography	444,338	3.05	22.24	27.82	45.37	1.53
Farms by Geography	5,149	2.02	20.06	32.12	45.27	0.52
Family Distribution by Income Level	571,889	23.23	17.00	18.29	41.48	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	230,063	9.03	39.65	33.96	17.33	0.03
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		50,065 52,600 18 percent	Median Housing Value Unemployment Rate (2010 US Census)		295,738 4.18 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Miami-Miami Beach-Kendall, FL MD consists of all census tracts in Miami-Dade County. Miami-Dade County is located along the southeastern tip of Florida and is bordered to the north by Broward County, to the east by the Atlantic Ocean, to the south by Monroe County and Florida Bay, and to the west by Monroe and Collier Counties. Some of the largest cities include Miami, Hialeah, Coral Gables, Homestead, Kendall, and Miami Beach. The eastern portion of the county is primarily urban while the western portion is primarily rural. Most of the western portion of the county lies in the Everglades National Park. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is a resort and tourist-oriented city with a burgeoning technology industry. The MSA population at the 2010 Census was 2,496,435, an increase of 10.8 per cent over 2000. The 2012 MSA population estimate was 2,591,035 as of July 2012 per the Census Bureau.

Leading industries include education and health services, government, professional and business services, retail trade, and leisure and hospitality services. Major employers include University of Miami, Baptist Health Systems of Southern Florida, Publix Supermarkets Inc., Jackson Health Systems, American Airlines, AT&T, Miami-Dade Community College, and WFB.

The HUD-adjusted median family income for 2011 was \$51,900 and increased to \$52,600 for 2012. The poverty rate as of the 2000 Census was 18 percent and remained at 18 percent as of the 2010 Census. The number of census tracts and families in Palm Beach County increased from 279 census tracts in 2000 to 361 in 2010.

The populations of people living in the low-income tracts in 2010 increased by 25 percent while the populations of people living in the moderate-income tracts increased by 18 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 6.0 percent in 2008. The unemployment rate rose significantly to 10.3 percent in 2009 and rose again in 2010 to 11.2 percent. The average annual unemployment rate declined slightly to 10.2 percent in 2011 and further declined to approximately 8.5 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 1.1 percent in Miami-Dade County and this decline was consistent with the national average for the same period. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Miami-Miami Beach-Kendall, FL MD that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was more than 1.25 times the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.5 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Miami-Miami Beach-Kendall, FL MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Miami-Miami Beach-Kendall MD was more than 1.5 times the national average. Additional challenges exist in lending to low-income families in the Miami-Miami Beach-Kendall MD because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Miami-Miami Beach-Kendall MD indicates that the number of families renting their homes is more than 1.25 times the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Florida statewide, including the Miami-Miami Beach-Kendall MD, the percent of mortgages that were underwater was more than 1.5 times the national average. Specifically in the Miami-Miami Beach-Kendall MD, home values declined by more than 1.75 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Miami-Miami Beach-Kendall MD were more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Miami-Miami Beach-Kendall MD, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank's lending performance in the Miami-Miami Beach-Kendall MD in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

The level of opportunity to make CD investments and loans is limited. For more information, refer to the CD lending and investment comment in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD Market Profile.

Community contacts indicate that the following are identified needs within the community:

- Homeownership preservation
- Rehabilitation of affordable single-family housing
- Neighborhood stabilization
- Affordable rental housing
- Asset building, and
- Economic development

Opportunities for participation by financial institutions include the following:

- Homeownership preservation
- Home improvement loans to low- and moderate-income borrowers
- Financing to contractors or investors willing to provide affordable rental housing for low and moderate-income individuals
- Donation of foreclosed homes to non-profit organizations for the preservation of affordable and workforce housing
- Participation in asset building programs, and
- Economic development

## Orlando-Kissimmee-Sanford, FL MSA

Demographic Information for Full-scope Area: Orlando-Kissimmee-Sanford FL MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	390	2.05	27.44	39.23	31.03	0.26
Population by Geography	2,140,221	1.08	26.87	41.22	30.82	0.01
Owner-Occupied Housing by Geography	507,381	0.48	20.25	43.65	35.61	0.01
Business by Geography	333,530	0.63	24.00	38.50	36.85	0.01
Farms by Geography	7,851	0.64	20.48	46.07	32.70	0.11
Family Distribution by Income Level	522,650	20.12	18.66	20.76	40.45	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	202,700	1.81	39.28	42.00	16.91	0.01
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		53,402 54,031 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		224,077 4.52 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Orlando-Kissimmee-Sanford MSA consists of Lake, Orange, Osceola, and Seminole Counties. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is a resort and tourist-oriented city with a burgeoning technology industry. The MSA population at the 2010 Census was 2,134,411, an increase of 29.8 per cent over 2000. The 2012 MSA population estimate was 2,223,674 as of July 2012 per the Census Bureau.

Leading industries include leisure and hospitality services, professional and business services, health and education services, retail trade, and government. Major employers include Walt Disney World Co., Florida Hospital, Publix Supermarkets Inc., Wal-Mart Stores Inc., Universal Orlando Resort, Orlando Regional Healthcare System, University of Central Florida, Hilton Hotels, Winn-Dixie Store Inc., McDonald's Corp., Lockheed Martin Corp., and Darden Restaurants Inc.

The HUD-adjusted median family income for 2011 was \$57,400 and increased to \$58,200 for 2012. The poverty rate as of the 2000 Census was 9.8 percent and increased to 11.6 percent as of the 2010 Census. The number of census tracts and families in the AA increased from 328 census tracts in 2000 to 389 in 2010. The populations of people living in the low-income tracts in 2010 decreased by 13 percent while the populations of people living in the moderate-income tracts increased by 52 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 5.9 percent in 2008. The unemployment rate rose significantly to 10.3 percent in 2009 and rose again in 2010 to 11.3 percent. The average annual unemployment rate declined slightly to 10.2 percent in 2011 and further declined to approximately 8.4 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 1.1 percent in the AA and this decline was consistent with the national average for the same period. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Orlando-Kissimmee-Sanford MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Orlando-Kissimmee-Sanford MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Orlando-Kissimmee-Sanford MSA was higher than the national average. Additional challenges exist in lending to low-income families in the Orlando-Kissimmee-Sanford MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Orlando-Kissimmee-Sanford MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Florida statewide, including the Orlando-Kissimmee-Sanford MSA, the percent of mortgages that were underwater was more than 1.5 times the national average. Specifically in the Orlando-Kissimmee-Sanford MSA, home values declined by more than 1.75 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Orlando-Kissimmee-Sanford MSA were more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Orlando-Kissimmee-Sanford MSA, we determined that cumulatively, the effect of these factors on demand

was extremely severe. We evaluated the bank's lending performance in the Orlando-Kissimmee-Sanford MSA in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

The level of opportunity to make CD investments and loans is limited. For more information, refer to the CD lending and investment comment in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD Market Profile.

Community contacts indicate that the following are identified needs within the community:

- Homeownership preservation
- Rehabilitation of affordable single-family housing
- Neighborhood stabilization
- Affordable rental housing
- Asset building, and
- Economic development

Opportunities for participation by financial institutions include the following:

- Homeownership preservation
- Rehabilitation loans and modernization financing for affordable single-family housing
- Donation of foreclosed homes to non-profit organizations for the preservation of affordable and workforce housing
- Participation in asset building programs, and
- Economic development

## Tampa-St. Petersburg-Clearwater, FL MSA

Demographic Information for Full-scope Area: Tampa-Saint Petersburg-Clearwater FL MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	742	4.45	25.74	41.24	27.36	1.21
Population by Geography	2,783,243	3.63	25.12	41.40	29.66	0.19
Owner-Occupied Housing by Geography	782,399	1.78	22.22	43.76	32.24	0.00
Business by Geography	399,074	2.72	21.39	39.25	36.46	0.18
Farms by Geography	8,967	1.85	23.17	43.69	31.27	0.01
Family Distribution by Income Level	698,563	20.72	18.53	19.74	41.01	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	274,173	5.96	36.40	41.51	16.14	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		57,333 56,400 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		198,240 4.26 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Tampa-St. Petersburg-Clearwater MSA consists of Hernando, Hillsborough, Pasco, and Pinellas County. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Tampa-St. Petersburg-Clearwater MSA is located in southwest Florida and is bordered by Citrus, Sumter, Polk, and Manatee Counties, and the Gulf of Mexico. The AA is a diversified industrial, commercial, and financial hub of the Florida West Coast. The MSA population at the 2010 Census was 2,783,243, an increase of 16.2 per cent over 2000. The 2012 MSA population estimate was 2,842,878 as of July 2012 per the Census Bureau.

Leading industries include professional and business services, health and education services, government, retail trade and hospitality services. Major employers include MacDill Air Force Base, Verizon Communications, University of South Florida, Tampa International Airport, Tampa General Hospital, Shriners Hospital for Children, St. Joseph's Hospital and JP Morgan Chase and Company.

The HUD-adjusted median family income for 2011 is \$63,300 and increased to \$64,100 for 2012. The poverty rate as of the 2000 Census was 9 percent and increased to 11 percent as of the 2010 Census. The number of census tracts and families in Palm Beach County increased from 265 census tracts in 2000 to 337 in 2010. The population of people living in the low-income tracts in 2010 increased by 35 percent while the population of people living in the moderate-income tracts increased by 3.5 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 6.6 percent in 2008. The unemployment rate rose significantly to 10.8 percent in 2009 and rose again in 2010 to 11.8 percent. The average annual unemployment rate declined slightly to 10.6 percent in 2011 and further declined to approximately 8.8 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 1.64 percent in Palm Beach County and this decline was consistent with the national average for the same period. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Tampa-St. Petersburg-Clearwater MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Tampa-St. Petersburg-Clearwater MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Tampa-St. Petersburg-Clearwater MSA was higher than the national average. Additional challenges exist in lending to low-income families in the Tampa-St. Petersburg-Clearwater MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Florida statewide, including the Tampa-St. Petersburg-Clearwater MSA, the percent of mortgages that were underwater was more than 1.5 times the national average. Specifically in the Tampa-St. Petersburg-Clearwater MSA, home values declined by more than 1.75 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Tampa-St. Petersburg-Clearwater MSA were more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Tampa-St. Petersburg-Clearwater MSA, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank’s lending performance in the Tampa-St. Petersburg-Clearwater MSA in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

The level of opportunity to make CD investments and loans is limited. For more information, refer to the CD lending and investment comment in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD Market Profile.

Community contacts indicate that the following are identified needs within the community:

- Homeownership preservation
- Rehabilitation of affordable single-family housing
- Neighborhood stabilization
- Affordable rental housing
- Asset building, and
- Economic development

Opportunities for participation by financial institutions include the following:

- Homeownership preservation.
- Rehabilitation loans and modernization financing for affordable single-family housing.
- Donation of foreclosed homes to non-profit organizations for the preservation of affordable and workforce housing
- Participation in asset building programs, and
- Economic development

## West Palm Beach-Boca Raton-Boynton Beach FL MD

Demographic Information for Full-scope Area: W Palm Beach-Boca Raton-Boynton Beach FL MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	337	6.23	24.93	31.45	35.01	2.37
Population by Geography	1,320,134	4.88	26.01	33.30	35.59	0.22
Owner-Occupied Housing by Geography	384,995	2.96	22.08	36.12	38.83	0.00
Business by Geography	253,649	3.63	18.82	31.37	46.00	0.19
Farms by Geography	4,915	3.97	22.08	29.40	44.52	0.04
Family Distribution by Income Level	324,849	21.50	17.84	18.93	41.73	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	127,797	8.13	36.53	34.23	21.11	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,445 64,100 11 percent	Median Housing Value Unemployment Rate (2010 US Census)		288,519 4.38 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The West Palm Beach-Boca Raton-Boynton Beach MD consists of Palm Beach County, FL. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Palm Beach County is located in southeast Florida and is bordered by Broward, Hendry, Glades, Okeechobee, Martin Counties, and the Atlantic Ocean. The AA is a resort and tourist-oriented county with a burgeoning technology industry. The MSA population at the 2010 Census was 1,320,134, an increase of 16.7 per cent over 2000. The 2012 MSA population estimate was 1,356,545 as of July 2012 per the Census Bureau.

Leading industries include retail trade, professional and business services, health and education services, hospitality services, and government. Major employers include Publix Supermarkets Inc., Tenet Healthcare, Hospital Corporation of America, and Florida Light & Power Company. Palm Beach County is headquarters to several of its other major employers including Florida Crystals, SimplexGrinnell, and Thomas Produce Company.

The HUD-adjusted median family income for 2011 is \$63,300 and increased to \$64,100 for 2012. The poverty rate as of the 2000 Census was 9 percent and increased to 11 percent as of the 2010 Census. The number of census tracts and families in Palm Beach County increased from 265 census tracts in 2000 to 337 in 2010. The population of people living in the low-income tracts in 2010 increased by 35 percent while the population of people living in the moderate-income tracts increased by 3.5 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 6.5 percent in 2008. The unemployment rate rose significantly to 10.5 percent in 2009 and rose again in 2010 to 11.4 percent. The average annual unemployment rate declined slightly to 10.5 percent in 2011 and further declined to approximately 8.8 percent in 2012. The 5-year (2007-2011) average short-term employment level declined 1.8 percent in Palm Beach County and this decline was 1.7 times more than the national average for the same period. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the West Palm Beach-Boca Raton-Boynton Beach MD that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.25 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the West Palm Beach-Boca Raton-Boynton Beach MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the West Palm Beach-Boca Raton-Boynton Beach MD was more than 1.25 times the national average.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Florida statewide, including the West Palm Beach-Boca Raton-Boynton Beach MD, the percent of mortgages that were underwater was more than 1.5 times the national average. Specifically in the West Palm Beach-Boca Raton-Boynton Beach MD, home values declined by more than 1.75 times the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the West Palm Beach-Boca Raton-Boynton Beach MD were more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the West Palm Beach-Boca Raton-Boynton Beach MD, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank’s lending performance in the West Palm Beach-Boca Raton-Boynton Beach MD in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

The level of opportunity to make CD investments and loans is limited. For more information, refer to the CD lending and investment comment in the Fort Lauderdale-Pompano Beach-Deerfield Beach MD Market Profile.

Palm Beach County has experienced one of the highest foreclosure rates in the nation. Older neighborhoods located in the Urban Redevelopment Area in West Palm Beach have been the hardest hit and destabilized through the surplus of vacant REO properties that reduce neighborhood property values and attract crime and vandalism.

Community contacts indicate that the following are identified needs within the community:

- Homeownership preservation
- Rehabilitation of affordable single-family housing
- Neighborhood stabilization
- Affordable rental housing
- Asset building, and
- Economic development

Opportunities for participation by financial institutions include the following:

- Homeownership preservation.
- Rehabilitation loans and modernization financing for affordable single-family housing.
- Donation of foreclosed homes to non-profit organizations for the preservation of affordable and workforce housing
- Participation in asset building programs, and
- Economic development

## State of Georgia

### Atlanta-Sandy Springs-Marietta, GA MSA

Demographic Information for Full-scope Area: Atlanta-Sandy Springs-Marietta GA MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	946	9.83	25.05	34.78	29.81	0.53
Population by Geography	5,268,860	6.22	24.34	39.10	30.22	0.11
Owner-Occupied Housing by Geography	1,271,887	2.82	19.27	41.63	36.28	0.00
Business by Geography	719,883	4.95	22.06	36.41	36.51	0.07
Farms by Geography	11,940	3.14	21.41	44.30	31.15	0.00
Family Distribution by Income Level	1,277,286	22.01	17.22	19.60	41.17	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	501,096	10.73	34.50	38.92	15.85	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		67,829 69,300 11 percent	Median Housing Value Unemployment Rate (2010 US Census)		210,153 4.69 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Atlanta-Sandy Springs-Marietta MSA consists of 28 counties. The counties that make up the AA are Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Cobb, Coweta, Dawson, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Newton, Paulding, Pickens, Pike, Rockdale, Spalding and Walton. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas.

According to the 2000 U.S. Census, the population of the AA was 4,247,981 people. The 2010 U.S. Census indicates the population of the AA increased by 24.0 percent, for a total population of 5,268,860. The AA area consisted on 1,086,862 families in 2000. In 2010, the total of families increased in the AA 17.5 percent, for 1,277,286 families. The largest sectors of employment are professional business services, government, health and education. Some of the AA largest employers are Delta Airlines, Emory University, AT&T and Centers for Disease Control.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB is the second ranked bank in terms of deposit market share. WFB has a deposit market share of 18.5 percent, which totals \$22.37 billion. There are 108 financial institutions in the AA accepting deposits. Primary competition is from Sun Trust and Bank of America, NA, with deposit markets shares of 26.4 percent and 16.9 percent, respectively.

According to 2000 U.S. Census information, the weighted average median housing value in the AA was \$145,855. In 2010, the weighted median housing value was \$210,153. U.S. Census information for 2000 indicates that 63.1 percent of the 1,644,572 housing units in the AA were owner-occupied. According to 2010 U.S. Census information, 57.2 percent of the 2,128,578 housing units were owner-occupied. According to the Bureau of Labor Statistics, the AA unemployment rate was consistent with statewide, but greater than national unemployment rates throughout the review period. In 2010, the AA unemployment rate was 10.1 percent. Statewide and national unemployment rates were 10.2 percent and 9.6 percent, respectively. Our assessment of lending performance took into consideration several economic and demographic factors identified in the Atlanta-Sandy Springs-Marietta MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, the number of “housing cost-burdened” households in the Atlanta-Sandy Springs-Marietta MSA is higher than the national average. The number of households in the AA that are considered housing cost-burdened and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage has a negative effect on loan demand. Additional challenges exist in lending to low-income families in the Atlanta-Sandy Springs-Marietta MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Georgia statewide, including the Atlanta-Sandy Springs-Marietta MSA, the percent of mortgages that were underwater was more than 1.25 times the national average. Specifically, in the Atlanta-Sandy Springs-Marietta MSA, home values declined by more than 1.25 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Atlanta-Sandy Springs-Marietta MSA, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank’s lending performance in the Atlanta-Sandy Springs-Marietta MSA in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts identified the following needs for CD:

- Affordable rental housing
- Home improvement loans
- Foreclosure prevention initiatives, and
- FHA 203K loans

Community contacts have identified numerous opportunities for CD in the AA.

## State of Nevada

### Las Vegas-Paradise, NV MSA

Demographic Information for Full-scope Area: Las Vegas-Paradise NV MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	487	5.75	23.20	41.27	29.77	0.00
Population by Geography	1,951,269	5.29	22.78	42.19	29.74	0.00
Owner-Occupied Housing by Geography	405,047	1.74	15.53	45.66	37.07	0.00
Business by Geography	135,379	4.79	21.49	42.20	31.52	0.00
Farms by Geography	1,917	2.82	20.24	42.10	34.85	0.00
Family Distribution by Income Level	457,592	20.10	18.02	22.00	39.88	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	174,412	9.69	33.02	40.10	17.20	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		63,888 64,300 10 percent	Median Housing Value Unemployment Rate (2010 US Census)		253,307 4.62 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Las Vegas-Paradise MSA consists of Clark County Nevada. As WFB's delineated AA, the AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. Clark County is southernmost county in the state of Nevada. Clark County's western border runs along the California border and its eastern boarder runs up against the Arizona border.

According to the 2000 U.S. Census, the population of Clark County was 1,375,765 people. The 2010 U.S. Census indicated that the population of the AA had increased by almost 42 percent, for a total population of 1,951,269. The economy of the AA revolves around hospitality and leisure services. Las Vegas is world renowned for casinos and various other entertainment options. Some of the major employers in the AA are MGM Resorts International, Caesars Entertainment Corporation and Ellis Air Force Base.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB has a deposit market share of 22.1 percent in the AA. WFB has deposits that total 8.28 billion in the AA. WFB deposit market share is ranked second in the AA. There are 40 financial institutions in the AA, which operate 379 branches. WFB has more branches than any competitor in the AA with 82 branches. Primary competitors for deposits in the AA are Bank of America, NA and Citibank. These banks have deposit market shares of 24.7 percent and 10.6 percent, respectively.

According to the 2000 U.S. Census information, the weighted average of median housing was \$127,982. According to 2010 U.S. Census, the weighted average median housing price had increased by almost 98 percent to \$253,307. The 2000 U.S. Census indicated that 54.1 percent of the 559,799 housing units were owner-occupied. 2010 U.S. Census information indicated that 49.8 percent of the 812,840 housing units were owner-occupied. The unemployment rate in the AA was consistent with statewide averages throughout the review period. The unemployment rate was greater throughout the review period, when compared to the national average. In 2010, the AA unemployment rate was 14.2 percent and the national unemployment rate was 9.6 percent.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Las Vegas-Paradise MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was more than 1.25 times the national average, the high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Las Vegas-Paradise MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Las Vegas-Paradise MSA was higher than the national average. Additional challenges exist in lending to low-income families in the Las Vegas-Paradise MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

The demographic data for the Las Vegas-Paradise MSA indicates that the number of families renting their homes is more than 1.25 times the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Nevada statewide, including the Las Vegas-Paradise MSA, the percent of mortgages that were underwater was more than 1.75 times the national average. Specifically in the Las Vegas-Paradise MSA, home values declined by more than 1.75 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Las Vegas-Paradise MSA, we determined that cumulatively, the effect of these factors on demand was extremely severe. We evaluated the bank’s lending performance in the Las Vegas-Paradise MSA in light of these extremely severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following CD needs in the AA:

- Child welfare funding
- Affordable housing
- Housing for the homeless, and
- Funding for home repair and rehabilitation.

Community contacts have identified a good level of CD opportunities within the AA.

## State of New Jersey

### Edison-New Brunswick, NJ MD

Demographic Information for Full-scope Area: Edison-New Brunswick NJ MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	511	6.85	18.40	48.73	25.44	0.59
Population by Geography	2,340,249	6.84	18.20	48.14	26.81	0.01
Owner-Occupied Housing by Geography	636,698	4.15	16.48	49.73	29.64	0.00
Business by Geography	197,409	4.71	15.35	48.03	31.90	0.00
Farms by Geography	4,136	1.81	11.03	48.28	38.88	0.00
Family Distribution by Income Level	596,298	20.39	17.87	22.04	39.70	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	228,158	11.18	27.45	47.02	14.34	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		91,959 96,600 7 percent	Median Housing Value Unemployment Rate (2010 US Census)		393,816 3.61 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Edison-New Brunswick MD is comprised of Middlesex, Monmouth, Ocean and Somerset Counties. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. These counties are located centrally in the state and push up against the eastern seaboard. According to the 2000 U.S. Census, the population of the AA was 2,173,869 people. Over the subsequent 10 years the population increased by approximately 7.6 percent for a total population of 2,340,249 people. The largest sectors of the economy are professional business services, education, health and government. Some of the largest employers in the AA are Robert Wood Johnson University Hospital, Novo Nordisk and Wakefern Food Corp.

According to the FDIC Deposit Market Share Report as of June 30, 2012, WFB is ranked first in deposit market share in the Edison-New Brunswick, NJ, MD. WFB has \$9.7 billion in deposits, which accounts for a 14.2 percent deposit market share. WFB bank operated 96 branches in the AA. Primary competitors in the AA are PNC Bank, NA and TD Bank, NA with deposit market shares of 12.2 percent and 10.6 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing price was \$182,418. According to the 2010 U.S. Census, the weighted average median housing price increased approximately 115 percent to \$393,816. U.S. Census information for 2000 indicates that 66.9 percent of all housing was owner-occupied in the AA.

According to 2010 U.S. Census information 67.2 percent of all housing was owner-occupied. According to the Bureau of Labor Statistics, the unemployment rate in the AA has been less than statewide and national averages throughout the AA. In 2010, the AA unemployment rate was 8.9 percent. The national and statewide unemployment rate was 9.6 percent in 2010. According to HUD, the weighted average median family income grew 1.4 percent between 2000 and 2010. In 2010, the weighted average median family income was \$96,600.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Edison-New Brunswick MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was more than 1.25 times the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Edison-New Brunswick MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Edison-New Brunswick MD was higher than the national average.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. Specifically in the Edison-New Brunswick MD, home values declined by more than the national average.

High foreclosure rates have also been an indicator of low demand for home purchase and refinance loans. Foreclosure rates in the Edison-New Brunswick MD were 1.25 times higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Edison-New Brunswick MD, we determined that cumulatively, the effect of these factors on demand for home purchase loans was severe and for home refinance loans was moderately severe. We evaluated the bank’s lending performance in the Edison-New Brunswick MD in light of these moderately severe and severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts in the area have identified the following CD needs:

- Loans to rebuild from Superstorm Sandy
- Small business development and training
- Affordable rental housing, and

- economic revitalization of blighted areas

Community contacts have identified an adequate amount of opportunity for CD.

## State of North Carolina

### Greensboro-Highpoint, NC MSA

Demographic Information for Full-scope Area: Greensboro-Highpoint NC MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	168	7.74	23.81	39.29	28.57	0.60
Population by Geography	723,801	6.16	23.07	42.77	28.00	0.00
Owner-Occupied Housing by Geography	186,847	2.40	18.68	46.37	32.55	0.00
Business by Geography	71,984	6.76	20.08	42.61	30.39	0.17
Farms by Geography	2,060	1.99	14.85	53.35	29.76	0.05
Family Distribution by Income Level	184,695	21.85	18.11	19.22	40.83	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	73,796	9.42	33.85	43.32	13.42	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		55,362 55,300 15 percent	Median Housing Value Unemployment Rate (2010 US Census)		142,459 4.55 percent	

(\*) The NA category consists of geographies that have not been assigned an income classification.  
Source: 2010 U.S. Census and 2012 HUD updated MFI

The Greensboro-High Point MSA is comprised of Randolph, Rockingham and Guilford Counties. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is part of the larger Greensboro- Winston-Salem-Highpoint CSA. The AA is located in the North Central region of North Carolina in a section of the state known as the Piedmont-Triad. Rockingham is the furthest north of the counties and connects to the Virginia state line.

According to the 2000 U.S. Census, the population of the AA was 643,430 people. According to the 2010 U.S. Census, the population in the AA increased to 723,802 people. Some of the largest employment sectors are manufacturing, education and health, and professional business services. The top employers in the AA are Moses H. Cohn Health Systems, LabCorp Inc., American Express and United Parcel Services Inc.

According to the FDIC June 30, 2012 Deposit Market Share Report, WFB is ranked first in the AA for deposit market share. WFB has an 18.7 percent deposit market share for a total \$1.97 billion. WFB also has the most branches located in the AA with 32. There were 26 deposit-taking institutions with 219 branches located in the AA. Some of the major competitors in the AA are Branch Banking and Trust Company, Bank of America, NA and Sun Trust Bank with deposit market shares of 18.1 percent, 8.0 percent and 7.8 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing price was \$105,099. The weighted average median housing price has risen 35.6 percent when compared to information provided in the 2010 U.S. Census. According to the 2000 U.S. Census, there were 171,747 owner-occupied housing units in the AA out of a total 275,021 housing units. According to the 2010 U.S. Census, there are 186,847 owner-occupied housing units out of 317,312 total housing units in the AA. Unemployment in the AA has been slightly higher the statewide and national average throughout the review period. According to the Bureau of Labor Statistics, the AA unemployment rate was 6.4 percent in 2008 and climbed until it reached its peak in 2010 at 11.4 percent. In 2010, state and national unemployment averages were 10.8 percent and 9.6 percent, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Greensboro-High Point MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, challenges exist in lending to low-income families in the Greensboro-High Point MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Greensboro-High Point MSA, we determined that cumulatively, the effect of these factors on demand for home refinance loans from low-income families was moderately severe. We evaluated the bank's lending performance in the Greensboro-High Point MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Increase the financial stability of low and moderate income families and individuals
- Services for individuals/families facing homelessness
- Strengthen programs for emergency financial assistance, and
- Revitalize deteriorating neighborhoods and areas with concentrated poverty.

The level of opportunity for CD activities is adequate.

## Northwestern NC Non-Metropolitan AA

Demographic Information for Full-scope Area: Northwestern NC Non Metropolitan AA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	247	2.02	13.36	55.47	29.15	0.00
Population by Geography	1,055,763	1.64	11.34	59.42	27.60	0.00
Owner-Occupied Housing by Geography	296,551	0.94	9.98	60.41	28.67	0.00
Business by Geography	91,166	1.81	11.41	55.29	31.49	0.00
Farms by Geography	3,474	0.49	8.03	63.82	27.66	0.00
Family Distribution by Income Level	283,204	20.31	16.82	19.95	42.91	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	105,161	2.85	16.21	63.56	17.37	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		48,939 50,200 16 percent	Median Housing Value Unemployment Rate (2010 US Census)		139,756 4.62 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Northwestern North Carolina Non-Metropolitan AA consists of the following counties: Avery, Cleveland, Davidson, Iredell, Lincoln, McDowell, Mitchell, Rowan, Rutherford, Stanley, Surry, Watauga, Wilkes and Yancey. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The MSA is located in the northwestern portion of the state and encompasses 14 contiguous counties. According to the 2000 U.S. Census there were 953,637 people residing in the AA. According to the 2010 U.S. Census, the population of the AA has increased 10.7 percent to 1,055,763 people. Some of the major employment sectors are agriculture, education and health care, professional business services and manufacturing.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB ranked first in terms of deposit market share. WFB had a deposit market share of 15.7 percent totaling 2.17 billion dollars. WFB also had the second most branches in the AA with 35. There were 44 deposit-taking institutions in AA with a total of 326 branches. Others bank's with a notable deposit market share were Branch Banking and Trust Company, Bank of North Carolina and Bank of America, NA with deposit market shares of 15.7 percent, 7.5 percent and 5.3 percent, respectively.

According to 2000 U.S. Census information, the weighted average median housing price was \$90,870. According to 2010 U.S. Census numbers, the weighted average median housing price was \$139,756. This represents a price increase of 53.8 percent over the 10-year period. According to 2000 U.S. Census information, owner-occupied housing

made up 66.5 percent of the available 419,866 housing units. U.S. Census information for 2010 indicates owner-occupied housing accounted for 61.2 percent of the 484,479 available housing units. U.S. Census information for 2000 indicated, unemployment was 3.1 percent and 12.7 percent of the resident lived below the poverty level. According to 2010 U.S. Census, the unemployment rate of the AA was 5.8 percent and 16.3 percent of the residents lived below the poverty level.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Northwestern North Carolina Non-Metropolitan AA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was more than 1.25 times the national average, challenges exist in lending to low-income families in the Northwestern North Carolina Non-Metropolitan AA because the percent of low-income families with incomes below the poverty rate is more than 1.25 times the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Northwestern North Carolina Non-Metropolitan AA, we determined that cumulatively, the effect of these factors on demand for home purchase loans was severe. We evaluated the bank's lending performance in the Northwestern North Carolina Non-Metropolitan AA in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Workforce development
- Job Creation
- Affordable housing, and
- Financial Education

The level of opportunity for CD activities is adequate.

## Raleigh-Cary NC MSA

Demographic Information for Full-scope Area: Raleigh-Cary NC MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	224	7.14	24.55	33.04	33.93	1.34
Population by Geography	1,130,490	6.12	27.04	36.50	29.97	0.38
Owner-Occupied Housing by Geography	276,445	2.49	25.77	38.29	33.45	0.01
Business by Geography	122,770	4.77	24.22	33.30	37.54	0.18
Farms by Geography	2,930	3.62	30.58	39.80	25.97	0.03
Family Distribution by Income Level	273,490	22.19	17.14	20.00	40.67	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	107,553	9.17	39.66	36.01	15.16	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		74,783 79,900 10 percent	Median Housing Value Unemployment Rate (2010 US Census)		219,374 3.44 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Raleigh-Cary MSA is comprised of Wake, Franklin and Johnston Counties. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The MSA is landlocked and resides in the eastern portion of the state. The MSA does not come into contact with the state-line and is closer to Virginia than South Carolina. The MSA is part of the Raleigh-Durham-Cary CSA. According to the 2000 U.S. Census the population of the MSA was 797,071. There has been an increase in the population by 41 percent according to the 2010 U.S. Census when 1,130,490 people resided in the AA. The AA area is part of the "Research Triangle", home to numerous high-tech and research companies. In addition to high-tech companies, there are several other employment sectors that have an economic impact on the AA. Other prominent employment sectors include government, professional services, education, health-care and retail. Some of the largest employers in the AA are WakeMed Health and Hospitals, North Carolina State University, Food Lion Stores, Cisco Systems and WFB.

In the Raleigh-Cary MSA WFB ranks first and accounts for 25.4 percent of total bank deposits, or 6.04 billion as June 30, 2010. WFB Bank operates 44 branches in the AA, which is the most of any financial institutions in the AA. As of June 30, 2012, there were 35 financial institutions with 312 branches in the AA. Other large competitors in the AA include PNC Bank, NA and Branch Banking and Trust Company with deposit market shares of 18.4 percent and 13.4 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing price was \$149,033 in the AA. According to 2010 U.S. Census housing prices have increased 47.2

percent and the weighted average median housing price was \$219,374. The percentage of owner-occupied housing units has increased 33.2 percent over the same time period and according to the 2010 U.S. Census, there were 276,445 owner-occupied housing units in the AA. According to the Bureau of Labor Statistics, unemployment in the AA has been less than the national and state averages throughout the review period. The AA unemployment rate in 2008 was 5 percent and increased until its peak in 2010 at 8.9 percent. In 2010, the national and statewide averages were 9.6 percent and 10.8 percent, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Raleigh-Cary MSA that affected the demand for loans during the evaluation period.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Raleigh-Cary MSA, we determined that cumulatively, these factors had no effect on demand.

Community contacts have identified the following credit and CD needs for this AA:

- Affordable housing for low and very-low income households
- Senior housing
- Job training, and
- Financial literacy

The level of opportunity for CD activities is good. There are numerous non-profit and CD entities serving the area.

## Winston-Salem NC MSA

Demographic Information for Full-scope Area: Winston-Salem NC MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	116	9.48	19.83	39.66	31.03	0.00
Population by Geography	477,717	6.33	21.22	40.85	31.59	0.00
Owner-Occupied Housing by Geography	130,256	2.39	16.17	45.44	36.01	0.00
Business by Geography	44,155	3.96	16.65	41.82	37.57	0.00
Farms by Geography	1,470	1.09	16.12	52.24	30.54	0.00
Family Distribution by Income Level	123,967	21.58	17.43	20.47	40.52	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	48,351	10.58	29.22	42.68	17.52	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		57,577 62,000 14 percent	Median Housing Value Unemployment Rate (2010 US Census)	145,649 3.87 percent		

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Winston-Salem MSA is comprised of Davie, Forsyth, Stokes and Yadkin counties. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is part of the larger Greensboro-Winston-Salem-Highpoint CSA. The AA is located in the North Central part of North Carolina in a section of the state known as the Piedmont-Triad. Stokes County has its northern border connected to the state-line with Virginia. According to the 2000 U.S. Census, there was a population of 421,961 people. According to the 2010 U.S. Census. The AA has seen an increase in population of 13.2 percent for 471,717 people. Some of the leading employment sectors in the AA health and education, government and professional business services. Some of the AA top employers are Wake Forest University Baptists Medical Center, Novant Health, Reynolds American Inc. and Hannesbrands Inc.

According to the FDIC Deposit Market Share Report, as of June 30, 2012 WFB ranked second in deposit share in the AA. WFB had a 6.5 percent market share that totaled \$2.26 billion. WFB bank has 22 branches in the AA, which is the most of any bank in the AA. There were 21 deposit-taking institutions in the AA that operated 133 branches. Some of the major competitors in the AA are Branch Banking and Trust Company, Southern Community Bank and Trust, and Piedmont Saving and Loan with deposit market shares of 82.6 percent, 2.01 percent and 1.9 percent, respectively.

According to the Bureau of Labor Statistics, in 2008 the unemployment rate of the AA was 5.9 percent. The AA unemployment rate hit a peak in 2010 at 10.2 percent. The 2010 state and national unemployment rates were 10.8 and 9.6 percent, respectively.

The weighted average of HUD updated MSA median family income in 2000 was \$61,200. The median family income only grew slightly and was \$62,000 in 2010. According to the 2000 U.S. Census, the weighted average median housing price was \$105,045. This number increased to \$145,649 according to the 2010 U.S. Census.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Winston-Salem MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, challenges exist in lending to low-income families in the Winston-Salem MSA because the percent of low-income families with incomes below the poverty rate is higher the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Winston-Salem MSA, we determined that cumulatively, the effect of these factors on demand was moderately severe. We evaluated the bank's lending performance in the Winston-Salem MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Increase the financial stability of low and moderate income families and individuals
- Services for individuals/families facing homelessness
- Strengthen programs for emergency financial assistance, and
- Revitalize deteriorating neighborhoods and areas with concentrated poverty.

The level of opportunity for CD activities is adequate

## State of Pennsylvania

### Philadelphia PA MD

Demographic Information for Full-scope Area: Philadelphia PA MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	998	15.83	17.84	29.66	35.07	1.60
Population by Geography	4,008,994	16.29	17.66	28.84	36.80	0.41
Owner-Occupied Housing by Geography	1,013,515	10.51	15.70	30.68	43.11	0.00
Business by Geography	438,117	9.35	13.20	28.57	48.33	0.56
Farms by Geography	6,980	2.15	7.02	33.72	57.03	0.07
Family Distribution by Income Level	952,079	23.44	16.43	18.80	41.33	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	379,616	27.82	25.73	27.60	18.84	0.02
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		74,808 79,200 13 percent	Median Housing Value Unemployment Rate (2010 US Census)		248,160 4.17 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Philadelphia MD is comprised of Bucks, Chester, Delaware, Montgomery and Philadelphia Counties. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is located in the southeast portion of the state. According to the 2000 U.S. Census the population of the MD was 3,849,647 persons. According to the 2010 U.S. Census, the MD had a population increase of approximately 4.1 percent for a total population of 4,008,994. Some of the leading employment sectors are Healthcare, education, professional business services and government. A few of the major employers in the MD are Jefferson Health System Inc., The University of Pennsylvania, Acme Markets and Merck and Co. Inc.

As of June 30, 2012, according to the FDIC Deposit Market Share Report, there are 93 deposit-taking institutions in the MD, with 1,322 branches. Deposits in the MD totaled \$106.2 billion. WFB ranked first in the Philadelphia MD in terms of deposit market share with 21.8 percent. WFB operates 156 branches, which ranks as second most in the MD. Major competition in the MD comes from Citizens Bank of Pennsylvania and PNC Bank with Deposit market shares of 14.72 and 10.7 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing value was \$124,584. The weighted average median housing value increased 99 percent over the following 10 years. According to the 2010 U.S. Census, the weighted average median

housing was \$248,160. The percentage of owner-occupied housing units remained consistent between the 2000 and 2010 U.S. Census. Owner-occupied housing accounted for 63.7 percent and 61.5 percent of total housing units in the MD, respectively.

Unemployment in the MD has been consistent with statewide averages throughout the review period. Unemployment has been incrementally better than the national unemployment averages throughout the review period. The AA unemployment rate, according to the Bureau of Labor Statistics, was 5.3 percent in 2008 and peaked in 2010 at 8.5 percent. Meanwhile the national unemployment average was 5.8 and 9.6 percent in the same period. According to 2000 and 2010 U.S. Census information, 12.1 percent and 12.9 percent of households in the AA were below the poverty level, respectively.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Philadelphia MD that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Philadelphia MD.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Philadelphia MD was higher than the national average. Additional challenges exist in lending to low-income families in the Philadelphia MD because the percent of low-income families with incomes below the poverty rate is higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Philadelphia MD, we determined that cumulatively, the effect of these factors on demand for home purchase loans was severe. We evaluated the bank’s lending performance in the Philadelphia MD in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following credit and CD needs for this AA:

- Grants for non-profits
- Expand economic opportunities for low income households
- Affordable housing for large families
- Small business development
- Financial literacy, and
- Increase and maintain the supply of affordable supportive housing for low-income and special needs populations.

The level of opportunity for CD activities is very good. There are numerous non-profit and CD entities serving the area

## State of Texas

### Austin-Round Rock-San Marcos TX MSA

Demographic Information for Full-scope Area: Austin-Round Rock-San Marcos TX MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	350	10.29	24.57	35.14	29.14	0.86
Population by Geography	1,716,289	10.74	23.88	34.83	30.41	0.14
Owner-Occupied Housing by Geography	367,502	4.29	18.40	38.85	38.45	0.00
Business by Geography	208,167	6.15	17.89	31.58	44.32	0.06
Farms by Geography	4,636	3.86	21.01	39.56	35.55	0.02
Family Distribution by Income Level	388,214	21.62	17.43	19.95	41.00	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	151,584	18.31	32.81	33.89	14.99	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		71,602 75,900 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		204,319 3.41 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Austin-Round Rock-San Marcos MSA consists of Bastrop, Caldwell, Hays, Travis and Williamson Counties. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Austin-Round Rock-San Marcos MSA is located in central Texas and the largest cities in this region include Austin, Georgetown, Round Rock, and San Marcos. Austin is sometimes referred to as the "Silicon Hills", mainly due to the large number of technology companies who make their home there. The MSA population at the 2010 Census was 1,716,289, an increase of 37.3 per cent over 2000. The 2012 MSA population estimate was 1,834,303 as of July 2012 per the Census Bureau.

Leading industries include government, professional and business services, health and education services, leisure and hospitality services, and retail trade. Major employers include the University of Texas at Austin, Seton Healthcare System, Dell Inc., H-E-B, St. David's Healthcare, WalMart Stores Inc., and IBM Corp.

The HUD-adjusted median family income for 2011 is \$74,900 and increased to \$75,900 for 2012. The poverty rate as of the 2000 Census was 10.3 percent and increased to 12.3 percent as of the 2010 Census. The number of census tracts and families in the Austin-Round Rock-San Marcos MSA increased from 256 census tracts in 2000 to 350 in 2010. The populations of people living in the low-income tracts in 2010 increased by 77 percent while the populations of people living in the moderate-income tracts increased by 28 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 4.4 percent in 2008. The unemployment rate rose significantly to 6.9 percent in 2009 and rose again in 2010 to 7.1 percent. The average annual unemployment rate declined slightly to 6.8 percent in 2011 and further declined to approximately 5.8 percent in 2012. The 5-year (2007-2011) average short-term employment level increased 1.8 percent in the Austin-Round Rock-San Marcos MSA. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Austin-Round Rock-San Marcos MSA that affected the demand for loans during the evaluation period.

Challenges exist in lending to low-income families in the Austin-Round Rock-San Marcos MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average. The demographic data for the Austin-Round Rock-San Marcos MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Austin-Round Rock-San Marcos MSA, we determined that cumulatively, the effect of these factors on the demand for home refinance loans from low-income families was moderately severe. We evaluated the bank's lending performance in the Austin-Round Rock-San Marcos MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

The Austin-Round Rock-San Marcos MSA has many well-established CD organizations operating within its boundaries. The organizations focus on affordable housing development, economic development, homeownership preservation and asset and wealth-building services. There are also a number of financial education programs and initiatives targeted at the unbanked. However, lending and investment activity by banks decreased due to low- or no-cost federal stimulus money that replaced the need for construction lending and displaced private funding. This resulted in lost opportunities for affordable housing lending and investment. States allocated fewer tax credit awards, reducing the amount of tax credit equity available to finance projects.

In the Direct Equity area, in conjunction with recent federal stimulus packages, exchange money and Tax Credit Assistance Programs (TCAP) were established. As part of the American Recovery and Reinvestment Act of 2009, \$2.25 billion was appropriated for the TCAP program to provide grants for capital investments in stalled LIHTC projects. The program essentially swapped tax credit funding for direct federal money under more favorable economic conditions, effectively supplanting private tax credit investment opportunities for financial institutions with public sector funds. Because the purpose of the fund was to immediately create or save jobs, there was a February 2012 deadline for

commitment and expenditure of the TCAP funds. Funds were allocated to state housing agencies. Texas was the third largest recipient of funds at \$148 million and Florida was fourth at \$101 million.

In addition to TCAP, the Tax Credit Exchange Program (TCEP) allowed state housing agencies to receive grants in lieu of the low-income housing tax credits that they otherwise would have received. This program applied to each state's 2009 LIHTC allocation. More than \$4 billion in TCEP funds were provided to help develop affordable housing by allowing states to exchange tax credits for cash. Texas received the largest amount of TCEP funds at \$594 million.

In Texas, the state housing agency decided that projects receiving state money cannot have any liens attached. This in effect forced banks to make unsecured construction loans – a significant change in underwriting and a significant risk – thus reducing opportunities for bank financing.

Community contacts indicate that the following are identified needs within the community:

- Retention and development of small businesses,
  - Affordable Housing,
  - Neighborhood stabilization,
  - Asset building, and
  - Economic development.
- 
- Opportunities for participation by financial institutions include the following:
  - Small business credit needs,
  - Rehabilitation loans and modernization financing for affordable housing,
  - Participation in asset building programs, and
  - Economic development.

## Dallas-Plano-Irving TX MD

Demographic Information for Full-scope Area: Dallas-Plano-Irving TX MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	899	13.01	24.69	26.81	35.15	0.33
Population by Geography	4,235,751	11.50	24.54	28.35	35.60	0.00
Owner-Occupied Housing by Geography	900,093	5.36	19.26	30.12	45.27	0.00
Business by Geography	519,427	8.45	18.08	27.00	46.26	0.21
Farms by Geography	9,706	5.85	17.79	34.24	42.04	0.08
Family Distribution by Income Level	1,006,245	23.23	16.67	18.29	41.81	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	401,469	20.56	35.52	27.83	16.10	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		67,501 70,600 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		173,147 3.56 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Dallas-Plano-Irving MD consists of Collin, Dallas, Delta, Denton, Ellis, Hunt, Kaufman, and Rockwall Counties. As WFB delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Dallas-Plano-Irving MD is located in North-East Texas and the largest cities in this region include Plano, Dallas, Cooper, Denton, Waxahachie, Greenville, Kaufman, and Rockwall. This AA has a broad manufacturing, aeronautics, and transportation with a burgeoning tourism sector. Dubbed the "Silicon Prairie", Dallas is among the country's largest employment centers for high technology. In addition, Dallas is also known as a center for telecommunications manufacturing in the United States. The Telecom Corridor is an area in Richardson, Texas, north of Dallas. Its nickname is in recognition of the proliferation of telecommunications companies in a small section of the community. The MSA population at the 2010 Census was 4,235,751, an increase of 23 per cent over 2000. The 2012 MSA population estimate was 4,426,611 as of July 2012 per the Census Bureau.

Leading industries include professional and business services, health and education services, government, retail trade, and leisure and hospitality services. Major employers include Wal-Mart Stores Inc., American Airlines, Bank of America Corp., Carlson Restaurants Worldwide, Texas Health Resources, Baylor Health Care System, AT & T, Lockheed Martin Aeronautics Co., and J.P. Morgan Chase and Company.

The HUD-adjusted median family income for 2011 is \$69,600 and increased to \$70,600 for 2012. The poverty rate as of the 2000 Census was 9.6 percent and increased to 11.9

percent as of the 2010 Census. The number of census tracts and families in the Dallas-Plano-Irving MD increased from 689 census tracts in 2000 to 899 in 2010. The populations of people living in the low-income tracts in 2010 increased by 86 percent while the populations of people living in the moderate-income tracts increased by 10 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 4.9 percent in 2008. The unemployment rate rose significantly to 7.5 percent in 2009 and rose again in 2010 to 8.2 percent. The average annual unemployment rate declined slightly to 8.0 percent in 2011 and further declined to approximately 6.8 percent in 2012. The 5-year (2007-2011) average short-term employment level increased 2.4 percent in the Dallas-Plano-Irving MD.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Dallas-Plano-Irving MD that affected the demand for loans during the evaluation period.

Challenges exist in lending to low-income families in the Dallas-Plano-Irving MD because the percent of low-income families with incomes below the poverty rate is higher than the national average. The demographic data for the Dallas-Plano-Irving MD indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Dallas-Plano-Irving MD, we determined that cumulatively, the effect of these factors on the demand for home refinance loans from low-income families was moderately severe. We evaluated the bank's lending performance in the Dallas-Plano-Irving MD in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

See the Austin-Round Rock-San Marcos MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of Texas including the Dallas-Plano-Irving MD.

Community contacts indicate that the following are identified needs within the community:

- Affordable Housing
- Affordable home improvement loans
- Revitalization of low income areas, and
- Small business loans

Opportunities for participation by financial institutions include the following:

- Construction Financing

- CD Lending
- Investments
- Service activities, and
- Economic development

## El Paso TX MSA

Demographic Information for Full-scope Area: El Paso TX MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	161	5.59	35.40	29.19	29.19	0.62
Population by Geography	800,647	3.86	32.18	32.26	31.70	0.00
Owner-Occupied Housing by Geography	155,280	1.70	28.43	31.58	38.29	0.00
Business by Geography	52,587	7.06	28.72	27.39	36.17	0.65
Farms by Geography	639	3.60	31.92	26.76	37.72	0.00
Family Distribution by Income Level	186,687	23.57	17.04	17.75	41.64	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	75,814	7.27	44.77	30.53	17.43	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		40,329 41,700 24 percent	Median Housing Value Unemployment Rate (2010 US Census)		109,330 3.09 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The El Paso MSA consists of all of El Paso County. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The El Paso MSA is located in Western tip of Texas and borders Mexico to the south, Arizona to the west, and New Mexico to the north. The largest city is El Paso. El Paso is an important entry point to the U.S. from Mexico. Once a major copper refining area, chief manufacturing industries in El Paso now include food production, clothing, construction materials, electronic and medical equipment, and plastics. Cotton, fruit, vegetables, livestock, and pecans are produced in the area. With El Paso's attractive climate and natural beauty, tourism has become a booming industry as well as trade with neighboring Ciudad Juárez.

The MSA population at the 2010 Census was 800,647, an increase of 18 per cent over 2000. The 2012 MSA population estimate was 830,735 as of July 2012 per the Census Bureau.

Leading industries include government, health and education services, leisure and hospitality services, and professional and business services. The largest employer in the area is Fort Bliss, a government installation. In addition to the military, the federal government has a strong presence in El Paso to manage its status and unique issues as a border region. The Immigration and Naturalization Service, the Drug Enforcement Agency, and the U.S. Customs Service all have agency operations in El Paso to regulate traffic and goods through ports of entry from Mexico. Other major employers include T & T Staff Management, VF Jeans wear, WalMart Stores Inc., University of Texas at El Paso, Tenet Hospital Ltd., and University Medical Center.

The HUD-adjusted median family income for 2011 is \$41,100 and increased to \$41,700 for 2012. The poverty rate as of the 2000 Census was 21.6 percent and increased to 24.1 percent as of the 2010 Census. The number of census tracts and families in the El Paso MSA increased from 126 census tracts in 2000 to 161 in 2010. The populations of people living in the low-income tracts in 2010 increased by 13 percent while the populations of people living in the moderate-income tracts increased by 39 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 6.3 percent in 2008. The unemployment rate rose significantly to 8.8 percent in 2009 and rose again in 2010 to 9.8 percent. The average annual unemployment rate rose to 10.4 percent in 2011 before declining to approximately 9.3 percent in 2012. The 5-year (2007-2011) average short-term employment level increased 1.4 percent in the El Paso MSA. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the El Paso MSA that affected the demand for loans during the evaluation period.

In addition to an unemployment rate that was higher than the national average, additional challenges in lending to low-income families exist in the El Paso MSA because the percent of low-income families with incomes below the poverty rate is more than 1.5 times the national average.

The demographic data for the El Paso MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the El Paso MSA, we determined that cumulatively, the effect of these factors on demand was severe. We evaluated the bank's lending performance in the El Paso MSA in light of these severe economic and demographic factors and adjusted our conclusions accordingly.

See the Austin-Round Rock-San Marcos MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of Texas including the El Paso MSA.

Community contacts indicate that the following are identified needs within the community:

- Affordable Housing
- Affordable home Improvement Loans
- Revitalization of low income areas, and

- Small business loans

### Fort Worth-Arlington TX MD

Demographic Information for Full-scope Area: Fort Worth-Arlington TX MD 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	415	8.19	27.47	38.31	25.78	0.24
Population by Geography	2,136,022	6.33	25.31	39.51	28.85	0.00
Owner-Occupied Housing by Geography	487,788	3.47	19.93	41.75	34.85	0.00
Business by Geography	238,576	4.47	20.84	37.87	36.67	0.15
Farms by Geography	5,492	2.95	17.37	46.41	33.27	0.00
Family Distribution by Income Level	525,211	21.54	17.63	19.69	41.14	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	205,705	10.78	37.46	38.26	13.51	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		65,319 69,200 12 percent	Median Housing Value Unemployment Rate (2010 US Census)		144,501 3.70 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Fort Worth-Arlington MD consists of Johnson, Parker, Tarrant, and Wise Counties. As WFB's delineated AA, the MD meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Fort Worth-Arlington MD is located in North-East Texas and the largest cities in this region include Ft. Worth, Arlington, Burleson, Weatherford, and Decatur. This AA has a broad industrial base in energy, manufacturing, aeronautics, and transportation with a burgeoning tourism sector. The MSA population at the 2010 Census was 2,136,022, an increase of 25 per cent over 2000. The 2012 MSA population estimate was 2,232,865 as of July 2012 per the Census Bureau.

Leading industries include government, health and education services, professional and business services, retail trade, and leisure and hospitality services. Major employers include American Airlines, Texas Health Resources, Lockheed Martin Aeronautics Co., Bell Helicopter Textron Inc., Albertson's Distribution Center, WFB, and the University of Texas at Arlington.

The HUD-adjusted median family income for 2011 is \$68,200 and increased to \$69,200 for 2012. The poverty rate as of the 2000 Census was .9.6 percent and increased to 11.7 percent as of the 2010 Census. The number of census tracts and families in the Fort Worth-Arlington, MD increased from 357 census tracts in 2000 to 415 in 2010. The populations of people living in the low-income tracts in 2010 increased by 55 percent while the populations of people living in the moderate-income tracts increased by 27 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 4.9 percent in 2008. The unemployment rate rose significantly to 7.5 percent in 2009 and rose again in 2010 to 8.2 percent. The average annual unemployment rate declined slightly to 8.0 percent in 2011 and further declined to approximately 6.8 percent in 2012. The 5-year (2007-2011) average short-term employment level increased 1.1 percent in the Fort Worth-Arlington MD. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Fort Worth-Arlington MD that affected the demand for loans during the evaluation period.

Challenges exist in lending to low-income families in the Fort Worth-Arlington MD because the percent of low-income families with incomes below the poverty rate is higher than the national average. The demographic data for the Fort Worth-Arlington MD indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Fort Worth-Arlington MD, we determined that cumulatively, the effect of these factors on the demand for home refinance loans from low-income families was moderately severe. We evaluated the bank's lending performance in the Fort Worth-Arlington MD in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly. See the Austin-Round Rock-San Marcos MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of Texas including the Fort Worth-Arlington MD.

Community contacts indicate that the following are identified needs within the community:

- Affordable Housing
- Affordable home improvement loans
- Revitalization of low-income areas, and
- Small business loans

Opportunities for participation by financial institutions include the following:

- CD Lending
- Investments
- Service activities, and
- Economic development

## Houston-Sugar Land-Baytown TX MSA

Demographic Information for Full-scope Area: Houston-Sugar Land-Baytown TX MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	1,073	12.58	28.80	27.12	30.94	0.56
Population by Geography	5,946,800	9.49	26.27	29.16	34.74	0.34
Owner-Occupied Housing by Geography	1,247,276	4.14	21.53	30.58	43.75	0.00
Business by Geography	648,424	8.08	20.30	25.87	45.70	0.05
Farms by Geography	11,498	4.58	20.08	35.57	39.76	0.00
Family Distribution by Income Level	1,399,621	23.85	16.60	17.62	41.94	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	566,064	17.03	38.38	27.96	16.63	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		64,179 66,900 13 percent	Median Housing Value Unemployment Rate (2010 US Census)		155,064 3.40 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Houston-Sugarland-Baytown MSA consists of Austin, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, San Jacinto, Sugarland, and Waller Counties. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The Houston-Sugarland-Baytown MSA is located in southeast Texas and the largest cities in this region include Houston, Baytown, Galveston, Sugarland, and Pasadena. This AA has a broad industrial base in energy, manufacturing, aeronautics, and transportation with a burgeoning health care sector. The MSA population at the 2010 Census was 5,946,800, an increase of 26 per cent over 2000. The 2012 MSA population estimate was 6,177,035 as of July 2012 per the Census Bureau.

Leading industries include professional and business services, government, health and education services, retail trade, and leisure and hospitality services. Major employers include the University of Texas, WalMart Stores Inc., Administaff, H-E-B., Exxon Mobil Corp., Continental Airlines, Memorial Hermann HealthCare System, and Shell Oil.

The HUD-adjusted median family income for 2011 was \$66,000 and increased to \$66,900 for 2012. The poverty rate as of the 2000 Census was 12.3 percent and increased to 13.2 percent as of the 2010 Census. The number of census tracts and families in the Houston-Sugarland-Baytown MSA increased from 895 census tracts in 2000 to 1073 in 2010. The populations of people living in the low-income tracts in 2010 increased by 86 percent while the populations of people living in the moderate-income tracts increased by 10 percent.

According to the Bureau of Labor Statistics, the average unemployment rate was 4.8 percent in 2008. The unemployment rate rose significantly to 7.5 percent in 2009 and rose again in 2010 to 8.5 percent. The average annual unemployment rate declined slightly to 8.1 percent in 2011 and further declined to approximately 6.8 percent in 2012. The 5-year (2007-2011) average short-term employment level increased 1.4 percent in the Houston-Sugarland-Baytown MSA. High unemployment rates and job contractions negatively affect opportunities to lend particularly to low- and moderate-income individuals or within low- and moderate-income areas.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Houston-Sugarland-Baytown MSA that affected the demand for loans during the evaluation period.

Challenges exist in lending to low-income families in the Houston-Sugarland-Baytown MSA because the percent of low-income families with incomes below the poverty rate is higher than the national average. The demographic data for the Houston-Sugarland-Baytown MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Houston-Sugarland-Baytown MSA, we determined that cumulatively, the effect of these factors on the demand for home refinance loans from low-income families was moderately severe. We evaluated the bank's lending performance in the Houston-Sugarland-Baytown MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

See the Austin-Round Rock-San Marcos MSA Market Profile for performance context factors that affected opportunities for CD lending and investment in the entire state of Texas including the Houston-Sugarland-Baytown MSA.

Community contacts indicate that the following are identified needs within the community:

- Affordable Housing
- Affordable home improvement loans
- Revitalization of low income areas, and
- Small business loans

Opportunities for participation by financial institutions include the following:

- CD Lending
- Investments
- Service activities, and
- Economic development

## State of Virginia

### Richmond VA MSA

Demographic Information for Full-scope Area: Richmond VA MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	305	9.51	25.90	34.43	28.85	1.31
Population by Geography	1,258,251	7.15	22.87	37.20	32.68	0.09
Owner-Occupied Housing by Geography	326,291	3.45	18.28	40.33	37.95	0.00
Business by Geography	132,062	5.00	20.88	35.79	38.21	0.12
Farms by Geography	3,583	1.81	21.91	41.39	34.89	0.00
Family Distribution by Income Level	314,799	20.59	18.07	21.11	40.23	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	121,705	12.72	32.71	37.67	16.90	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		71,292 75,600 10 percent	Median Housing Value Unemployment Rate (2010 US Census)		229,187 3.62 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Richmond MSA consists of 20 contiguous counties. The counties that make up the AA are as follows: Amelia, Caroline, Charles City, Chesterfield, Cumberland, Dinwiddie, Goochland, Hanover, Henrico, King and Queen, King William, Louisa, New Kent, Pawhatan, Prince George, Sussex, Colonial Heights City, Hopewell City, Petersburg City and Richmond City. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas. The AA is primarily located in the eastern part of the state.

According to the 2000 U.S. Census, the AA had a total population of 1,096,957 persons. According to the 2010 U.S. Census, the population increased by 14.7 percent to a total population of 1,258,251. U.S. Census information for 2000 indicated that the AA had 289,794 families. According to the 2010 U.S. Census, the AA saw an increase in families by 8.6 percent, which totaled 314,799 families. The AA has a diverse economy. The largest sectors of employment in the AA are government, professional business services, health and education. Some of the AA largest employers are Capital One Financial Corporation, Virginia Commonwealth University, Fort Lee and HCA Incorporated.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB is third ranked in deposits in the AA. WFB has an 8.4 percent deposit market share and total of \$5.9 billion in deposits. There are 37 financial institutions in the AA competing for deposits.

Primary competitors include Capital One Bank and Bank of America, NA, with deposit market shares of 55.8 percent and 15.7 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing value in the AA was \$115,680. U.S. Census information for 2010 indicated the weighted average median housing value increased 98 percent over the ten-year period. In 2010, the weighted average median housing value was \$229,187. Bureau of Labor Statistics information indicates the unemployment rate in the AA was higher than the statewide average and lower than national averages throughout the review period. In 2010, the unemployment rate in the AA was 8 percent. Statewide and national unemployment averages in 2010 were 7.1 percent and 9.6 percent, respectively. The weighted average HUD-adjusted median family income remained unchanged from 2000 to 2010 at \$74,600.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Richmond MSA that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Richmond MSA.

In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Virginia statewide, including the Richmond MSA, the percent of mortgages that were underwater was higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Richmond MSA, we determined that cumulatively, the effect of these factors on demand was moderately severe. We evaluated the bank's lending performance in the Richmond MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

Information obtained from community contacts identified the following CD needs in the AA:

- Housing rehabilitation
- Affordable housing
- Economic development, and
- Affordable rental housing

Community contacts identified an adequate amount of opportunities for CD.

## Virginia Beach-Norfolk-Newport News VA MSA

Demographic Information for Full-scope Area: Virginia Beach-Norfolk-Newport News VA MSA 2010						
Demographic Characteristics	#	Low percent of #	Moderate percent of #	Middle percent of #	Upper percent of #	NA* percent of #
Geographies (Census Tracts)	412	7.04	25.00	36.65	29.13	2.18
Population by Geography	1,648,136	5.33	23.24	37.98	33.45	0.01
Owner-Occupied Housing by Geography	393,777	2.08	17.62	40.40	39.90	0.00
Business by Geography	147,370	4.57	19.89	38.03	37.22	0.29
Farms by Geography	3,091	2.23	15.11	42.06	40.41	0.19
Family Distribution by Income Level	416,676	19.49	18.34	22.19	39.98	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	157,642	9.52	33.64	38.68	18.15	0.00
Median Family Income HUD Adjusted Median Family Income for 2012 Households Below Poverty Level		68,178 70,900 10 percent	Median Housing Value Unemployment Rate (2010 U.S. Census)		255,359 3.15 percent	

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

Source: 2010 U.S. Census and 2012 HUD updated MFI

The Virginia Beach–Norfolk-Newport News MSA consists of 15 contiguous counties. The following counties make up the AA: Gloucester, Isle of Wight, James City, Mathews, Surry, Chesapeake City, Hampton City, Newport News City, Norfolk City, Poquoson City, Portsmouth City, Suffolk City, Virginia Beach City, Williamsburg City and York. As WFB's delineated AA, the MSA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income areas.

The AA is primarily located in southeast Virginia. According to the 2000 U.S. Census the population of the AA was 1,558,180. U.S. Census information for 2010 revealed that the population of the AA has increased to 1,648,136. U.S. Census information for 2000 indicated the AA had 403,487 families.

U.S. Census information for 2010 indicated 416,676 families resided in the AA. The largest employment sectors in the AA are government, professional business services, health and education. Some of the largest employers in the AA are Norfolk Naval Station, Huntington Ingalls Industries, Sentara Health Systems and Old Dominion University.

According to the June 30, 2012 FDIC Deposit Market Share Report, WFB is ranked first in deposits in the AA. WFB has a 20.9 percent market share, which totals \$4.42 billion. There are 30 financial institutions in the AA with a total of 362 branches. Primary competitors in the AA include Sun Trust Bank and Towne Bank with deposit market shares of 16.9 percent and 14.7 percent, respectively.

According to the 2000 U.S. Census, the weighted average median housing price was \$112,602. U.S. Census information for 2010 indicates that the weighted average median housing values increased 126.8 percent. In 2010, weighted average median housing price was \$255,359. According to the Bureau of Labor Statistics, the unemployment rate of the AA was greater than statewide averages and less than national averages throughout the review period. In 2010, the unemployment rate of the AA was 7.5 percent.

The 2010 statewide and national unemployment rates were 7.1 percent and 9.6 percent respectively. In 2000, the weighted average HUD-adjusted median family income in the AA was \$69,900. In 2010, the weighted average median family income remained unchanged at \$69,900.

Our assessment of lending performance took into consideration several economic and demographic factors identified in the Virginia Beach–Norfolk-Newport News MSA that affected the demand for loans during the evaluation period.

The high cost of housing as evidenced by an affordability ratio (the ratio of median home value to median family income) that was higher than the national average negatively affected the demand for home loans in low- and moderate-income geographies and to low- and moderate-income borrowers in the Virginia Beach–Norfolk-Newport News MSA.

The number of households in the AA that are considered “housing cost-burdened” and less likely to be able to save for a down payment or have the necessary income to qualify for a mortgage also has a negative effect on loan demand. The number of housing cost-burdened households in the Virginia Beach–Norfolk-Newport News MSA was higher than the national average.

The demographic data for the Virginia Beach–Norfolk-Newport News MSA indicates that the number of families renting their homes is higher than the national average. AAs with a significant percentage of families who rent and presumably would not have a mortgage to refinance reduces the potential market for home refinance loans to low- and moderate-income families. In addition, areas with declining home values and a large percentage of homes with underwater mortgages (mortgages where the loan amount exceeded the value of the home) have a reduced demand for refinance loans. For Virginia statewide, including the Virginia Beach–Norfolk-Newport News MSA, the percent of mortgages that were underwater was higher than the national average.

Taking into consideration all the economic and demographic factors affecting the demand for home purchase and home refinance loans in the Virginia Beach–Norfolk-Newport News MSA, we determined that cumulatively, the effect of these factors on demand was moderately severe. We evaluated the bank’s lending performance in the Virginia Beach–Norfolk-Newport News MSA in light of these moderately severe economic and demographic factors and adjusted our conclusions accordingly.

Community contacts have identified the following areas as opportunities for CD.

- Affordable rental housing
- Housing for low- and moderate-income individuals, and
- Workforce housing

There are good opportunities in the AA for CD.

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan areas are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/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 percent 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 of each year. Tables without data are not included in this PE.

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

**Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. CD loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. See Interagency Q&As \_\_\_\_\_.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.

**Table 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 two-page table lists specific categories.

**Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

**Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.

- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's 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 Home Mortgage 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, 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 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy intranet page for guidance on table placement.
- Table 15. Distribution of Branch Delivery System and Branch Openings/Closings** - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: MULTISTATE METROPOLITAN AREAS												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Allentown-Bethlehem-Easton, PA-NJ MSA	2.26	11,660	2,083,246	2,667	135,945	21	476	7	19,100	14,355	2,238,766	2.37
Augusta-Richmond County, GA-SC MSA	1.37	7,452	1,147,842	1,214	62,952	11	715	1	4,289	8,678	1,215,798	1.09
Charlotte-Gastonia-Rock Hill, NC-SC MSA	5.43	27,690	5,404,166	6,718	373,248	27	1,082	12	63,313	34,447	5,841,809	18.06
Columbus, GA-AL MSA	0.54	2,890	465,290	557	33,541	3	165	2	9,030	3,452	508,026	0.55
Davenport-Moline-Rock Island, IA-IL MSA	2.17	8,392	1,178,909	5,141	266,455	247	31,318	4	8,164	13,784	1,484,847	0.84
Fargo, ND-MN MSA	1.88	7,948	1,240,200	3,308	189,218	670	82,370	10	5,415	11,936	1,517,203	0.56
Grand Forks, ND-MN MSA	0.43	2,041	302,813	614	32,424	71	7,441	0	0	2,726	342,678	0.09
Logan, UT-ID MSA	0.84	3,152	539,681	1,954	75,235	212	7,523	1	3,859	5,319	626,298	0.14
Memphis, TN-MS MSA	2.08	12,366	2,030,320	800	37,680	13	478	8	48,156	13,187	2,116,634	0.32
Minneapolis-St. Paul-Bloomington, MN-WI MSA	39.07	154,963	31,355,220	92,285	3,101,881	745	38,009	74	160,861	248,067	34,655,970	55.63
New York-White Plains-Wayne, NY-NJ MD	68.94	59,471	22,033,876	17,350	704,228	37	1,300	18	554,783	76,876	23,294,188	62.42
Newark-Union, NJ-PA MD	31.06	27,527	7,948,345	7,067	358,684	17	975	3	31,446	34,614	8,339,450	37.58
Omaha-Council Bluffs, NE-IA MSA	6.70	32,721	5,233,135	9,554	363,813	227	15,610	16	64,669	42,518	5,677,227	2.11
Portland-Vancouver-Hillsboro, OR-WA MSA	21.53	95,693	22,211,161	40,378	1,579,809	596	22,617	35	100,004	136,702	23,913,592	4.32
Texarkana, TX-Texarkana, AR MSA	0.29	1,327	176,300	476	28,149	53	3,801	2	19,789	1,858	228,039	0.55
Washington-Arlington-Alexandria, DC-VA-MD MD	15.41	86,696	28,994,414	11,095	513,251	35	1,550	19	189,732	97,845	29,698,947	13.37

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: MULTISTATE METROPOLITAN AREAS								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	4,113	2.54	1.17	1.05	16.64	15.39	50.09	46.49	32.10	37.08	25.17	24.27	23.96	24.92	26.06
Augusta-Richmond County, GA-SC MSA	3,379	2.09	4.06	1.07	15.01	7.46	55.01	55.02	25.92	36.46	23.93	36.49	25.45	24.71	22.22
Charlotte-Gastonia-Rock Hill, NC-SC MSA	9,807	6.05	1.23	0.51	18.14	8.54	51.31	45.48	29.32	45.47	22.06	20.14	21.12	21.60	22.77
Columbus, GA-AL MSA	1,400	0.86	2.53	0.79	19.93	10.43	41.02	46.36	36.52	42.43	24.19	44.44	24.72	25.23	22.83
Davenport-Moline-Rock Island, IA-IL MSA	2,643	1.63	1.20	0.64	13.91	9.76	61.81	56.68	23.08	32.92	12.51	13.79	11.54	13.05	11.93
Fargo, ND-MN MSA	2,906	1.79	0.00	0.00	8.26	5.71	72.89	61.18	18.86	33.10	19.50	0.00	27.07	19.94	17.65
Grand Forks, ND-MN MSA	880	0.54	0.09	0.23	1.58	2.84	75.52	62.73	22.81	34.20	20.08	0.00	28.57	18.03	24.32
Logan, UT-ID MSA	892	0.55	0.27	0.11	17.81	28.25	50.26	40.81	31.66	30.83	11.35	100.00	14.50	9.13	11.94
Memphis, TN-MS MSA	5,174	3.19	5.31	0.58	21.41	5.47	34.45	25.14	38.82	68.81	19.21	15.70	16.63	18.73	19.71
Minneapolis-St. Paul-Bloomington, MN-WI MSA	52,974	32.69	1.50	2.04	13.23	13.09	56.89	56.61	28.39	28.26	26.88	23.41	26.26	26.96	27.19
New York-White Plains-Wayne, NY-NJ MD	27,852	76.07	2.00	2.60	11.78	12.92	26.48	26.61	59.75	57.87	24.49	22.41	21.75	25.30	24.96
Newark-Union, NJ-PA MD	8,760	23.93	3.05	5.91	14.35	15.95	34.65	32.67	47.95	45.47	23.77	26.40	26.30	24.83	21.86
Omaha-Council Bluffs, NE-IA MSA	12,332	7.61	0.97	0.23	19.35	9.25	53.30	47.45	26.38	43.07	23.44	16.67	18.53	22.20	26.32
Portland-Vancouver-Hillsboro, OR-WA MSA	28,753	17.75	0.71	0.77	15.43	17.38	55.69	50.47	28.18	31.38	20.74	18.43	20.40	20.36	21.63
Texarkana, TX-Texarkana, AR MSA	733	0.45	3.51	0.00	8.79	6.82	72.42	65.35	15.28	27.83	12.36	0.00	9.46	12.75	12.02
Washington-Arlington-Alexandria, DC-VA-MD MD	36,043	22.24	2.12	2.76	16.26	14.87	44.00	43.89	37.61	38.48	25.07	23.17	24.43	25.34	25.15

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: MULTISTATE METROPOLITAN AREAS								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	283	2.60	1.17	0.71	16.64	15.19	50.09	51.24	32.10	32.86	9.10	8.70	9.93	8.96	8.91
Augusta-Richmond County, GA-SC MSA	253	2.33	4.06	1.19	15.01	7.51	55.01	52.96	25.92	38.34	25.10	10.00	22.00	24.91	27.27
Charlotte-Gastonia-Rock Hill, NC-SC MSA	395	3.63	1.23	1.27	18.14	9.37	51.31	43.54	29.32	45.82	19.45	37.50	10.86	17.49	25.97
Columbus, GA-AL MSA	116	1.07	2.53	1.72	19.93	20.69	41.02	35.34	36.52	42.24	20.98	7.14	16.44	18.12	28.46
Davenport-Moline-Rock Island, IA-IL MSA	346	3.18	1.20	1.73	13.91	12.72	61.81	55.78	23.08	29.77	7.46	17.65	5.50	6.93	9.45
Fargo, ND-MN MSA	233	2.14	0.00	0.00	8.26	4.29	72.89	71.24	18.86	24.46	12.24	0.00	11.63	12.89	10.74
Grand Forks, ND-MN MSA	59	0.54	0.09	0.00	1.58	5.08	75.52	71.19	22.81	23.73	5.99	0.00	0.00	5.71	6.67
Logan, UT-ID MSA	81	0.75	0.27	1.23	17.81	11.11	50.26	45.68	31.66	41.98	12.37	0.00	0.00	10.42	17.95
Memphis, TN-MS MSA	141	1.30	5.31	2.84	21.41	5.67	34.45	31.21	38.82	60.28	8.54	4.55	3.11	5.83	14.54
Minneapolis-St. Paul-Bloomington, MN-WI MSA	4,522	41.59	1.50	1.22	13.23	8.80	56.89	51.97	28.39	38.01	25.64	30.00	22.22	25.10	27.55
New York-White Plains-Wayne, NY-NJ MD	1,178	71.92	2.00	1.95	11.78	10.19	26.48	21.56	59.75	66.30	16.77	15.00	18.99	18.33	16.00
Newark-Union, NJ-PA MD	460	28.08	3.05	3.04	14.35	16.96	34.65	33.48	47.95	46.52	13.69	25.00	16.72	13.48	12.64
Omaha-Council Bluffs, NE-IA MSA	914	8.41	0.97	0.66	19.35	13.35	53.30	46.72	26.38	39.28	11.43	12.50	11.15	10.83	12.54
Portland-Vancouver-Hillsboro, OR-WA MSA	2,145	19.73	0.71	0.61	15.43	12.87	55.69	52.17	28.18	34.36	18.87	16.67	18.57	18.81	19.15
Texarkana, TX-Texarkana, AR MSA	53	0.49	3.51	0.00	8.79	5.66	72.42	75.47	15.28	18.87	7.03	0.00	7.69	8.53	2.38
Washington-Arlington-Alexandria, DC-VA-MD MD	1,331	12.24	2.12	1.73	16.26	14.27	44.00	39.14	37.61	44.85	13.72	9.30	13.67	12.25	15.71

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: MULTISTATE METROPOLITAN AREAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	7,261	2.58	1.17	0.32	16.64	8.52	50.09	42.75	32.10	48.41	21.29	17.39	21.14	21.01	21.64
Augusta-Richmond County, GA-SC MSA	3,819	1.35	4.06	0.65	15.01	5.68	55.01	43.18	25.92	50.48	24.98	15.09	19.74	22.58	28.55
Charlotte-Gastonia-Rock Hill, NC-SC MSA	17,478	6.20	1.23	0.41	18.14	5.82	51.31	39.96	29.32	53.80	22.67	22.35	19.93	22.16	23.50
Columbus, GA-AL MSA	1,361	0.48	2.53	0.51	19.93	6.25	41.02	29.46	36.52	63.78	19.34	9.68	13.48	18.90	20.49
Davenport-Moline-Rock Island, IA-IL MSA	5,392	1.91	1.20	0.26	13.91	9.01	61.81	52.67	23.08	38.06	12.55	5.66	14.72	11.84	13.15
Fargo, ND-MN MSA	4,795	1.70	0.00	0.00	8.26	3.52	72.89	62.27	18.86	34.20	25.41	0.00	22.22	24.92	26.92
Grand Forks, ND-MN MSA	1,095	0.39	0.09	0.09	1.58	3.20	75.52	57.63	22.81	39.09	15.97	0.00	33.33	13.58	19.36
Logan, UT-ID MSA	2,178	0.77	0.27	0.09	17.81	16.48	50.26	47.47	31.66	35.95	14.53	25.00	15.74	15.64	12.76
Memphis, TN-MS MSA	7,047	2.50	5.31	0.34	21.41	4.26	34.45	25.09	38.82	70.31	20.63	17.17	16.52	20.46	21.13
Minneapolis-St. Paul-Bloomington, MN-WI MSA	97,406	34.56	1.50	0.64	13.23	6.74	56.89	52.30	28.39	40.32	27.29	25.50	25.84	27.21	27.72
New York-White Plains-Wayne, NY-NJ MD	30,321	62.36	2.00	0.90	11.78	6.16	26.48	17.63	59.75	75.30	18.73	13.81	15.14	18.47	19.30
Newark-Union, NJ-PA MD	18,303	37.64	3.05	1.14	14.35	7.61	34.65	30.35	47.95	60.90	20.77	24.87	22.82	20.78	20.43
Omaha-Council Bluffs, NE-IA MSA	19,467	6.91	0.97	0.19	19.35	7.15	53.30	45.08	26.38	47.58	19.49	11.32	15.14	18.79	21.05
Portland-Vancouver-Hillsboro, OR-WA MSA	64,755	22.97	0.71	0.67	15.43	12.62	55.69	50.80	28.18	35.91	23.04	22.88	22.67	23.19	22.96
Texarkana, TX-Texarkana, AR MSA	540	0.19	3.51	0.56	8.79	8.15	72.42	60.93	15.28	30.37	11.63	0.00	11.86	11.33	12.44
Washington-Arlington-Alexandria, DC-VA-MD MD	49,281	17.48	2.12	1.92	16.26	9.84	44.00	37.01	37.61	51.23	20.31	20.30	20.78	20.98	19.75

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: MULTISTATE METROPOLITAN AREAS								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	3	1.49	7.30	0.00	27.94	33.33	48.77	66.67	15.99	0.00	6.38	0.00	4.55	10.00	0.00
Augusta-Richmond County, GA-SC MSA	1	0.50	14.05	0.00	19.01	100.00	46.88	0.00	20.06	0.00	0.00	0.00	0.00	0.00	0.00
Charlotte-Gastonia-Rock Hill, NC-SC MSA	8	3.98	3.38	25.00	25.80	12.50	46.15	37.50	24.67	25.00	9.52	25.00	0.00	6.67	18.18
Columbus, GA-AL MSA	5	2.49	25.19	0.00	26.28	60.00	23.89	20.00	24.64	20.00	16.67	0.00	66.67	16.67	0.00
Davenport-Moline-Rock Island, IA-IL MSA	11	5.47	5.84	9.09	20.04	0.00	50.66	63.64	23.46	27.27	7.69	0.00	0.00	8.00	28.57
Fargo, ND-MN MSA	14	6.97	0.00	0.00	30.13	35.71	60.36	50.00	9.51	14.29	0.00	0.00	0.00	0.00	0.00
Grand Forks, ND-MN MSA	7	3.48	7.01	0.00	3.65	0.00	80.23	100.00	9.11	0.00	8.70	0.00	0.00	8.70	0.00
Logan, UT-ID MSA	1	0.50	24.45	0.00	65.36	0.00	8.26	100.00	1.93	0.00	0.00	0.00	0.00	0.00	0.00
Memphis, TN-MS MSA	4	1.99	14.59	0.00	30.00	25.00	30.67	25.00	24.74	50.00	0.00	0.00	0.00	0.00	0.00
Minneapolis-St. Paul-Bloomington, MN-WI MSA	61	30.35	9.87	0.00	29.18	22.95	47.29	57.38	13.66	19.67	4.42	0.00	4.41	5.41	3.70
New York-White Plains-Wayne, NY-NJ MD	56	93.33	17.72	8.93	29.34	30.36	21.19	23.21	31.74	37.50	1.10	0.34	0.72	1.80	1.25
Newark-Union, NJ-PA MD	4	6.67	25.33	25.00	33.78	25.00	25.60	0.00	15.30	50.00	1.05	0.00	0.00	2.04	5.88
Omaha-Council Bluffs, NE-IA MSA	8	3.98	1.83	0.00	30.46	62.50	53.36	25.00	14.35	12.50	0.88	0.00	1.72	0.00	0.00
Portland-Vancouver-Hillsboro, OR-WA MSA	40	19.90	3.45	5.00	34.95	37.50	43.30	32.50	18.31	25.00	3.59	0.00	3.00	2.22	11.54
Texarkana, TX-Texarkana, AR MSA	1	0.50	9.15	0.00	21.05	0.00	48.59	0.00	21.22	100.00	0.00	0.00	0.00	0.00	0.00
Washington-Arlington-Alexandria, DC-VA-MD MD	37	18.41	12.45	8.11	37.50	48.65	29.17	35.14	20.88	8.11	8.37	2.13	12.82	14.29	2.08

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses* **	% BANK Loans****	% of Businesses* **	% BANK Loans	% of Businesses* **	% BANK Loans	% of Businesses* **	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Allentown-Bethlehem-Easton, PA-NJ MSA	2,667	1.51	3.68	2.89	15.69	14.36	45.67	45.86	34.96	36.90	13.34	17.21	14.39	13.48	13.10
Augusta-Richmond County, GA-SC MSA	1,214	0.69	6.91	7.25	13.67	10.05	49.38	43.57	30.05	39.13	12.57	11.75	15.53	13.06	11.91
Charlotte-Gastonia-Rock Hill, NC-SC MSA	6,712	3.80	2.67	3.25	15.31	13.44	45.13	37.95	36.79	45.37	16.27	17.12	15.60	14.63	18.88
Columbus, GA-AL MSA	538	0.30	6.69	7.62	16.94	16.91	32.59	36.25	41.22	39.22	13.45	22.75	12.15	14.70	11.86
Davenport-Moline-Rock Island, IA-IL MSA	5,141	2.91	4.58	4.59	15.93	19.61	52.46	39.54	27.02	36.26	26.79	28.57	29.44	22.50	33.05
Fargo, ND-MN MSA	3,308	1.87	0.00	0.00	22.48	28.96	58.95	52.36	18.56	18.68	16.08	0.00	18.27	17.43	12.47
Grand Forks, ND-MN MSA	614	0.35	2.34	1.14	3.17	5.37	70.60	64.82	23.89	28.66	9.71	8.00	35.19	10.97	8.08
Logan, UT-ID MSA	1,954	1.11	1.18	0.10	25.32	22.42	42.82	47.34	30.68	30.14	24.33	20.00	21.53	25.72	28.07
Memphis, TN-MS MSA	799	0.45	6.48	3.75	17.85	14.52	30.17	24.28	45.23	57.45	3.17	4.18	3.13	2.93	3.27
Minneapolis-St. Paul-Bloomington, MN-WI MSA	92,266	52.25	3.22	2.52	13.49	10.74	54.65	50.80	28.50	35.94	32.60	28.36	29.14	31.38	36.98
New York-White Plains-Wayne, NY-NJ MD	17,191	70.87	6.65	2.77	18.35	11.67	22.15	20.17	51.85	65.39	3.80	2.05	2.77	3.44	4.42
Newark-Union, NJ-PA MD	7,067	29.13	8.71	4.83	17.69	12.24	31.50	34.78	42.09	48.15	9.45	9.70	10.12	10.80	8.81
Omaha-Council Bluffs, NE-IA MSA	9,554	5.41	1.46	1.20	17.05	13.44	50.67	48.66	30.82	36.70	18.89	18.55	16.51	19.35	20.26
Portland-Vancouver-Hillsboro, OR-WA MSA	40,378	22.86	3.86	3.93	19.33	19.00	47.74	43.49	29.07	33.59	20.68	20.15	22.92	19.41	22.59
Texarkana, TX-Texarkana, AR MSA	476	0.27	5.79	7.77	11.93	15.13	63.51	55.88	18.77	21.22	8.03	18.18	8.19	8.48	6.27
Washington-Arlington-Alexandria, DC-VA-MD MD	10,975	6.21	4.39	3.05	15.09	12.15	39.34	36.37	39.55	48.42	10.71	8.44	10.66	10.42	11.40

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Allentown-Bethlehem-Easton, PA-NJ MSA	21	0.72	0.52	0.00	6.79	4.76	48.06	61.90	44.63	33.33	29.55	0.00	50.00	29.17	27.78
Augusta-Richmond County, GA-SC MSA	11	0.38	3.50	0.00	20.47	0.00	55.70	63.64	20.33	36.36	6.61	0.00	0.00	7.14	25.00
Charlotte-Gastonia-Rock Hill, NC-SC MSA	27	0.92	1.04	0.00	14.78	11.11	58.18	48.15	25.95	40.74	16.00	0.00	9.09	10.84	50.00
Columbus, GA-AL MSA	3	0.10	1.85	0.00	16.85	66.67	36.17	0.00	43.59	33.33	9.52	0.00	20.00	0.00	20.00
Davenport-Moline-Rock Island, IA-IL MSA	247	8.43	0.51	0.00	6.11	2.43	71.72	76.92	21.67	20.65	24.79	0.00	7.14	25.41	28.89
Fargo, ND-MN MSA	670	22.86	0.00	0.00	5.37	0.75	83.08	96.12	11.55	3.13	23.67	0.00	16.67	24.92	11.54
Grand Forks, ND-MN MSA	71	2.42	0.10	0.00	0.58	0.00	79.51	78.87	19.81	21.13	2.05	0.00	0.00	2.05	2.53
Logan, UT-ID MSA	212	7.23	0.00	0.00	9.12	3.30	69.12	80.19	21.76	16.51	37.21	0.00	100.00	32.76	81.82
Memphis, TN-MS MSA	13	0.44	5.07	0.00	15.61	15.38	40.36	69.23	38.77	15.38	5.22	0.00	10.00	5.95	2.86
Minneapolis-St. Paul-Bloomington, MN-WI MSA	745	25.42	0.56	1.21	8.31	8.19	68.57	63.49	22.54	27.11	40.26	75.00	48.48	33.24	64.29
New York-White Plains-Wayne, NY-NJ MD	37	68.52	2.50	0.00	8.22	2.70	18.09	27.03	70.91	70.27	15.43	0.00	4.35	21.21	19.77
Newark-Union, NJ-PA MD	17	31.48	1.15	0.00	8.21	29.41	36.32	0.00	54.32	70.59	19.30	0.00	66.67	0.00	20.59
Omaha-Council Bluffs, NE-IA MSA	227	7.74	0.23	0.00	7.08	18.94	73.00	66.08	19.69	14.98	8.80	0.00	35.48	6.29	16.46
Portland-Vancouver-Hillsboro, OR-WA MSA	596	20.33	1.68	0.17	10.43	4.87	63.03	67.95	24.87	27.01	39.73	0.00	61.11	38.46	42.57
Texarkana, TX-Texarkana, AR MSA	53	1.81	1.22	0.00	4.49	7.55	78.57	69.81	15.71	22.64	9.09	0.00	40.00	4.84	20.00
Washington-Arlington-Alexandria, DC-VA-MD MD	35	1.19	1.39	0.00	13.05	20.00	51.27	31.43	34.13	48.57	21.82	0.00	33.33	21.28	22.22

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	4,113	2.54	18.44	9.96	19.24	27.49	23.54	27.46	38.78	35.09	24.65	22.98	24.17	24.57	25.72
Augusta-Richmond County, GA-SC MSA	3,379	2.09	22.37	8.26	16.64	21.22	20.78	26.25	40.21	44.27	24.47	23.86	23.15	24.51	25.26
Charlotte-Gastonia-Rock Hill, NC-SC MSA	9,809	6.05	19.43	13.60	18.53	22.40	22.93	22.16	39.11	41.84	21.21	19.94	18.01	21.69	23.53
Columbus, GA-AL MSA	1,407	0.87	21.82	7.03	17.68	19.30	20.64	29.22	39.86	44.45	24.26	23.98	26.11	24.86	23.32
Davenport-Moline-Rock Island, IA-IL MSA	2,643	1.63	18.97	13.88	18.70	26.77	24.11	26.02	38.22	33.33	13.84	14.52	13.99	14.69	12.79
Fargo, ND-MN MSA	2,906	1.79	17.69	10.21	18.73	28.32	26.50	28.50	37.08	32.98	22.64	19.23	22.86	22.88	23.29
Grand Forks, ND-MN MSA	880	0.54	17.59	8.72	19.53	28.14	25.02	28.95	37.85	34.19	23.38	18.45	27.48	25.52	20.40
Logan, UT-ID MSA	892	0.55	16.92	7.49	20.71	27.40	24.02	31.15	38.35	33.96	11.13	9.88	9.51	10.05	14.80
Memphis, TN-MS MSA	5,174	3.19	22.42	9.44	16.49	21.81	19.78	26.45	41.32	42.30	19.25	17.87	17.28	19.93	20.29
Minneapolis-St. Paul-Bloomington, MN-WI MSA	52,974	32.69	17.05	19.57	18.97	30.93	26.43	23.14	37.56	26.36	29.67	30.07	29.52	29.52	29.62
New York-White Plains-Wayne, NY-NJ MD	27,888	76.10	25.76	0.56	15.40	6.14	16.77	22.02	42.07	71.28	25.84	15.87	21.20	26.01	26.44
Newark-Union, NJ-PA MD	8,760	23.90	22.22	5.07	16.88	22.18	20.32	26.75	40.58	46.00	23.77	23.08	22.58	24.41	24.11
Omaha-Council Bluffs, NE-IA MSA	12,332	7.61	17.73	11.17	19.37	27.03	24.72	27.22	38.18	34.58	25.75	22.64	24.51	26.79	26.99
Portland-Vancouver-Hillsboro, OR-WA MSA	28,753	17.74	18.37	5.93	19.20	23.31	23.62	29.01	38.81	41.74	21.56	20.12	20.04	22.01	22.67
Texarkana, TX-Texarkana, AR MSA	733	0.45	23.23	3.10	16.47	19.65	19.47	29.25	40.83	48.01	10.99	4.92	12.92	10.78	10.97
Washington-Arlington-Alexandria, DC-VA-MD MD	36,043	22.24	20.06	13.55	17.74	23.87	22.20	26.57	39.99	36.01	26.46	26.13	25.41	26.91	26.98

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.8% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	283	2.60	18.44	13.81	19.24	23.13	23.54	26.49	38.78	36.57	8.57	10.09	9.52	8.72	7.36
Augusta-Richmond County, GA-SC MSA	253	2.33	22.37	6.80	16.64	19.60	20.78	24.00	40.21	49.60	25.83	21.28	26.67	26.50	26.05
Charlotte-Gastonia-Rock Hill, NC-SC MSA	395	3.63	19.43	11.08	18.53	20.05	22.93	22.69	39.11	46.17	19.46	12.73	14.29	21.92	23.62
Columbus, GA-AL MSA	116	1.07	21.82	12.07	17.68	22.41	20.64	29.31	39.86	36.21	21.28	21.43	18.33	20.69	22.73
Davenport-Moline-Rock Island, IA-IL MSA	346	3.18	18.97	9.09	18.70	23.75	24.11	25.51	38.22	41.64	7.65	4.17	7.89	5.97	10.39
Fargo, ND-MN MSA	233	2.14	17.69	7.02	18.73	21.93	26.50	25.00	37.08	46.05	12.84	16.33	12.73	11.76	12.88
Grand Forks, ND-MN MSA	59	0.54	17.59	3.51	19.53	7.02	25.02	24.56	37.85	64.91	6.19	0.00	4.26	5.77	8.99
Logan, UT-ID MSA	81	0.75	16.92	5.06	20.71	12.66	24.02	39.24	38.35	43.04	12.63	20.00	7.69	18.75	7.50
Memphis, TN-MS MSA	141	1.30	22.42	1.54	16.49	14.62	19.78	26.15	41.32	57.69	8.16	1.14	6.57	8.44	12.23
Minneapolis-St. Paul-Bloomington, MN-WI MSA	4,522	41.59	17.05	8.89	18.97	21.44	26.43	28.30	37.56	41.36	25.56	19.14	23.58	24.51	29.99
New York-White Plains-Wayne, NY-NJ MD	1,178	71.92	25.76	2.03	15.40	10.08	16.77	19.10	42.07	68.79	16.94	10.32	18.61	17.99	16.71
Newark-Union, NJ-PA MD	460	28.08	22.22	4.86	16.88	16.90	20.32	26.39	40.58	51.85	13.12	6.92	13.65	13.43	13.81
Omaha-Council Bluffs, NE-IA MSA	914	8.41	17.73	9.60	19.37	20.09	24.72	25.45	38.18	44.87	11.62	8.64	13.26	10.86	12.08
Portland-Vancouver-Hillsboro, OR-WA MSA	2,145	19.73	18.37	4.45	19.20	17.73	23.62	28.39	38.81	49.43	18.97	20.00	18.26	18.99	19.10
Texarkana, TX-Texarkana, AR MSA	53	0.49	23.23	11.76	16.47	17.65	19.47	23.53	40.83	47.06	7.93	18.18	6.25	3.33	7.29
Washington-Arlington-Alexandria, DC-VA-MD MD	1,331	12.24	20.06	12.58	17.74	18.98	22.20	24.84	39.99	43.59	13.68	11.44	12.37	14.10	14.85

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Allentown-Bethlehem-Easton, PA-NJ MSA	7,261	2.58	18.44	5.19	19.24	16.72	23.54	24.27	38.78	53.83	22.57	20.06	22.01	21.88	23.52
Augusta-Richmond County, GA-SC MSA	3,819	1.35	22.37	4.88	16.64	13.44	20.78	22.30	40.21	59.39	26.98	21.09	24.71	25.91	28.62
Charlotte-Gastonia-Rock Hill, NC-SC MSA	17,478	6.20	19.43	4.49	18.53	13.20	22.93	20.74	39.11	61.57	24.06	18.50	20.89	22.99	25.99
Columbus, GA-AL MSA	1,362	0.48	21.82	4.33	17.68	13.78	20.64	21.13	39.86	60.76	20.36	14.73	21.64	18.58	21.17
Davenport-Moline-Rock Island, IA-IL MSA	5,392	1.91	18.97	7.28	18.70	17.35	24.11	24.63	38.22	50.74	13.60	13.09	12.22	13.41	14.30
Fargo, ND-MN MSA	4,795	1.70	17.69	4.14	18.73	16.51	26.50	27.03	37.08	52.32	28.95	27.02	26.39	26.44	31.72
Grand Forks, ND-MN MSA	1,095	0.39	17.59	3.41	19.53	17.25	25.02	26.48	37.85	52.86	17.07	7.69	17.78	14.88	19.05
Logan, UT-ID MSA	2,178	0.77	16.92	3.78	20.71	18.15	24.02	33.21	38.35	44.86	15.32	12.39	15.55	15.22	15.62
Memphis, TN-MS MSA	7,047	2.50	22.42	3.52	16.49	10.66	19.78	20.01	41.32	65.80	20.89	17.82	18.98	20.24	21.73
Minneapolis-St. Paul-Bloomington, MN-WI MSA	97,406	34.56	17.05	6.48	18.97	19.15	26.43	26.98	37.56	47.39	28.71	24.36	26.14	27.61	31.22
New York-White Plains-Wayne, NY-NJ MD	30,348	62.38	25.76	0.77	15.40	4.20	16.77	14.21	42.07	80.83	20.12	9.27	15.13	19.07	20.97
Newark-Union, NJ-PA MD	18,303	37.62	22.22	2.56	16.88	10.64	20.32	21.97	40.58	64.83	22.34	16.90	19.53	21.65	23.51
Omaha-Council Bluffs, NE-IA MSA	19,467	6.91	17.73	5.28	19.37	15.69	24.72	25.33	38.18	53.69	19.88	15.15	18.24	18.89	21.67
Portland-Vancouver-Hillsboro, OR-WA MSA	64,755	22.97	18.37	4.04	19.20	16.25	23.62	27.28	38.81	52.44	24.46	18.61	23.15	23.76	26.08
Texarkana, TX-Texarkana, AR MSA	540	0.19	23.23	1.96	16.47	9.59	19.47	21.13	40.83	67.32	12.10	6.00	11.28	10.08	13.47
Washington-Arlington-Alexandria, DC-VA-MD MD	49,285	17.48	20.06	5.18	17.74	14.21	22.20	25.57	39.99	55.04	21.13	19.14	20.89	21.08	21.45

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 12.5% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MULTISTATE METROPOLITAN AREAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Allentown-Bethlehem-Easton, PA-NJ MSA	2,667	1.51	66.51	62.24	92.13	4.20	3.67	13.34	18.56
Augusta-Richmond County, GA-SC MSA	1,214	0.69	68.79	57.33	91.27	5.02	3.71	12.57	15.78
Charlotte-Gastonia-Rock Hill, NC-SC MSA	6,718	3.80	66.64	54.11	90.55	4.85	4.60	16.27	20.05
Columbus, GA-AL MSA	557	0.32	66.85	58.89	86.89	6.28	6.82	13.45	18.80
Davenport-Moline-Rock Island, IA-IL MSA	5,141	2.91	65.95	65.45	92.24	3.58	4.18	26.79	36.84
Fargo, ND-MN MSA	3,308	1.87	68.65	65.63	90.66	5.14	4.20	16.08	24.21
Grand Forks, ND-MN MSA	614	0.35	68.55	72.96	93.16	2.61	4.23	9.71	16.93
Logan, UT-ID MSA	1,954	1.11	71.84	69.81	95.85	2.46	1.69	24.33	41.86
Memphis, TN-MS MSA	800	0.45	67.76	65.88	94.13	3.63	2.25	3.17	5.36
Minneapolis-St. Paul-Bloomington, MN-WI MSA	92,285	52.21	68.78	74.62	96.32	2.07	1.60	32.60	45.41
New York-White Plains-Wayne, NY-NJ MD	17,350	71.06	66.04	62.11	94.77	3.75	1.48	3.80	6.93
Newark-Union, NJ-PA MD	7,067	28.94	68.35	56.12	92.70	3.96	3.34	9.45	13.59
Omaha-Council Bluffs, NE-IA MSA	9,554	5.41	67.33	71.98	95.32	2.47	2.21	18.89	29.58
Portland-Vancouver-Hillsboro, OR-WA MSA	40,378	22.84	66.83	72.86	94.97	3.11	1.92	20.68	31.64
Texarkana, TX-Texarkana, AR MSA	476	0.27	69.35	56.51	90.13	5.88	3.99	8.03	13.66
Washington-Arlington-Alexandria, DC-VA-MD MD	11,095	6.28	67.42	57.75	93.45	4.03	2.52	10.71	13.74

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.5% 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 METROPOLITAN AREAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Allentown-Bethlehem-Easton, PA-NJ MSA	21	0.72	97.30	85.71	100.00	0.00	0.00	29.55	40.00
Augusta-Richmond County, GA-SC MSA	11	0.38	97.87	63.64	81.82	9.09	9.09	6.61	6.02
Charlotte-Gastonia-Rock Hill, NC-SC MSA	27	0.92	96.91	85.19	92.59	3.70	3.70	16.00	20.00
Columbus, GA-AL MSA	3	0.10	96.29	33.33	100.00	0.00	0.00	9.52	7.69
Davenport-Moline-Rock Island, IA-IL MSA	247	8.43	98.12	69.23	66.40	17.00	16.60	24.79	27.04
Fargo, ND-MN MSA	670	22.86	97.31	65.37	61.94	26.12	11.94	23.67	24.28
Grand Forks, ND-MN MSA	71	2.42	97.38	69.01	74.65	11.27	14.08	2.05	1.77
Logan, UT-ID MSA	212	7.23	98.24	91.51	95.75	4.25	0.00	37.21	45.36
Memphis, TN-MS MSA	13	0.44	95.63	100.00	100.00	0.00	0.00	5.22	6.60
Minneapolis-St. Paul-Bloomington, MN-WI MSA	745	25.42	97.29	78.93	87.92	8.99	3.09	40.26	42.94
New York-White Plains-Wayne, NY-NJ MD	37	68.52	96.43	67.57	97.30	0.00	2.70	15.43	52.94
Newark-Union, NJ-PA MD	17	31.48	96.84	64.71	88.24	11.76	0.00	19.30	36.00
Omaha-Council Bluffs, NE-IA MSA	227	7.74	98.70	74.45	81.50	13.22	5.29	8.80	8.53
Portland-Vancouver-Hillsboro, OR-WA MSA	596	20.33	96.20	77.52	96.31	3.19	0.50	39.73	50.00
Texarkana, TX-Texarkana, AR MSA	53	1.81	97.14	35.85	83.02	13.21	3.77	9.09	6.76
Washington-Arlington-Alexandria, DC-VA-MD MD	35	1.19	95.90	54.29	91.43	5.71	2.86	21.82	23.33

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 15.3% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MULTISTATE METROPOLITAN AREAS		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Allentown-Bethlehem-Easton, PA-NJ MSA	1	314	58	12,314	59	12,628	1.79	0	0
Augusta-Richmond County, GA-SC MSA	2	1,408	41	3,068	43	4,477	0.63	0	0
Charlotte-Gastonia-Rock Hill, NC-SC MSA	8	20,630	163	63,143	171	83,774	11.87	0	0
Columbus, GA-AL MSA	1	1,595	19	901	20	2,496	0.35	0	0
Davenport-Moline-Rock Island, IA-IL MSA	7	3,597	32	6,750	39	10,346	1.47	1	118
Fargo, ND-MN MSA	7	1,624	12	15,077	19	16,702	2.37	0	0
Grand Forks, ND-MN MSA	3	2,130	2	1,703	5	3,832	0.54	0	0
Logan, UT-ID MSA	3	10,672	8	4,782	11	15,454	2.19	1	40
Memphis, TN-MS MSA	2	3,069	25	50,427	27	53,496	7.58	0	0
Minneapolis-St. Paul-Bloomington, MN-WI MSA	79	89,070	322	119,737	401	208,807	29.60	2	1,955
New York-White Plains-Wayne, NY-NJ MD	17	32,762	244	292,400	261	325,163	89.77	0	0
Newark-Union, NJ-PA MD	0	0	60	37,069	60	37,069	10.23	0	0
Omaha-Council Bluffs, NE-IA MSA	22	11,494	74	61,936	96	73,430	10.41	0	0
Portland-Vancouver-Hillsboro, OR-WA MSA	35	23,040	75	82,145	110	105,184	14.91	0	0
Texarkana, TX-Texarkana, AR MSA	0	0	4	31,305	4	31,305	4.44	0	0
Washington-Arlington-Alexandria, DC-VA-MD	5	25,571	232	57,976	237	83,547	11.84	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: MULTISTATE METROPOLITAN AREAS						Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Allentown-Bethlehem-Easton, PA-NJ MSA	2.37	46	8.63	4.35	26.09	47.83	21.74	0	3	0	-1	-2	0	7.78	20.14	40.44	31.64		
Augusta-Richmond County, GA-SC MSA	1.09	21	3.94	0.00	9.52	47.62	42.86	0	0	0	0	0	0	5.63	27.37	37.40	29.59		
Charlotte-Gastonia-Rock Hill, NC-SC MSA	18.06	75	14.07	16.00	21.33	21.33	41.33	0	1	0	0	0	-1	8.52	25.12	31.87	34.37		
Columbus, GA-AL MSA	0.55	14	2.63	14.29	28.57	7.14	50.00	0	0	0	0	0	0	7.58	21.68	36.77	33.34		
Davenport-Moline-Rock Island, IA-IL MSA	0.84	17	3.19	17.65	11.76	58.82	11.76	0	0	0	0	0	0	4.85	16.96	55.92	22.27		
Fargo, ND-MN MSA	0.56	10	1.88	10.00	40.00	40.00	10.00	0	1	0	0	-1	0	4.49	12.80	56.35	26.36		
Grand Forks, ND-MN MSA	0.09	2	0.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	5.29	16.88	65.76	12.07		
Logan, UT-ID MSA	0.14	7	1.31	0.00	57.14	42.86	0.00	0	0	0	0	0	0	2.17	26.70	55.37	15.76		
Memphis, TN-MS MSA	0.32	8	1.50	0.00	25.00	12.50	62.50	0	0	0	0	0	0	13.07	23.04	28.00	35.50		
Minneapolis-St. Paul-Bloomington, MN-WI MSA	55.63	101	18.95	5.94	17.82	46.53	29.70	0	6	-1	-2	-2	-1	6.36	17.77	49.45	26.30		
New York-White Plains-Wayne, NY-NJ MD	62.42	118	57.84	1.69	14.41	16.95	66.95	0	4	0	0	0	-4	12.88	25.24	25.91	35.76		
Newark-Union, NJ-PA MD	37.58	86	42.16	13.95	19.77	26.74	39.53	3	5	1	0	0	-3	12.66	23.13	25.33	38.67		
Omaha-Council Bluffs, NE-IA MSA	2.11	18	3.38	5.56	22.22	38.89	33.33	0	2	0	0	-1	-1	8.41	19.73	42.99	28.57		
Portland-Vancouver-Hillsboro, OR-WA MSA	4.33	72	13.51	5.56	34.72	36.11	23.61	0	2	0	-1	-1	0	2.69	23.70	48.22	25.37		
Texarkana, TX-Texarkana, AR MSA	0.55	8	1.50	0.00	25.00	62.50	12.50	3	4	0	0	-1	0	8.17	7.79	63.52	20.50		
Washington-Arlington-Alexandria, DC-VA-MD MD	13.37	134	25.14	8.96	22.39	30.60	38.06	1	4	0	-1	0	-2	8.81	23.22	36.38	31.35		

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: ALABAMA												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Birmingham-Hoover, AL MSA	29.22	10,742	1,846,194	2,053	108,158	16	1,522	2	750	12,813	1,956,624	42.54
Huntsville, AL MSA	15.65	6,240	1,123,695	620	39,968	4	149	0	0	6,864	1,163,812	6.81
Montgomery, AL MSA	8.32	3,128	575,864	500	41,533	15	2,104	6	26,833	3,649	646,334	10.32
Limited Review:												
Anniston-Oxford, AL MSA	1.83	602	75,950	195	15,067	4	12	0	0	801	91,029	3.30
Auburn-Opelika, AL MSA	4.08	1,584	283,556	204	8,449	3	112	0	0	1,791	292,117	1.64
Baldwin County, AL Non-Metro	4.58	1,620	277,663	381	27,688	9	881	0	0	2,010	306,232	4.57
Cullman-Marshall, AL Non-Metro	3.26	1,188	176,161	232	12,861	11	531	0	0	1,431	189,554	3.48
Dallas County, AL Non-Metro	0.51	138	16,089	85	4,932	2	126	0	0	225	21,147	0.79
Decatur, AL MSA	4.14	1,669	216,782	145	9,489	3	50	0	0	1,817	226,321	1.49
Dothan, AL MSA	3.84	1,358	197,918	317	24,323	10	664	0	0	1,685	222,905	4.73
Eastern Central AL Non-Metro	2.55	873	139,418	240	16,263	4	230	0	0	1,117	155,911	1.80
Florence-Muscle Shoals, AL MSA	2.92	1,115	149,982	165	14,096	0	0	0	0	1,280	164,078	1.88
Gadsden, AL MSA	2.15	780	100,048	159	8,656	3	88	0	0	942	108,792	2.08
Marion County, AL Non-Metro	0.42	147	15,145	37	2,435	2	75	0	0	186	17,655	1.00
Mobile, AL MSA	7.92	2,865	444,330	604	37,048	1	5	1	3,805	3,471	485,188	6.48
Southeastern AL Non-Metro	3.97	1,386	198,625	342	17,651	13	900	0	0	1,741	217,176	4.75
Tuscaloosa, AL MSA	4.62	1,776	287,752	245	15,885	5	1,320	2	1,585	2,028	306,542	2.35

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: ALABAMA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	4,226	28.05	2.24	0.59	22.80	7.62	42.47	39.71	32.49	52.08	18.58	21.25	18.78	16.61	20.34
Huntsville, AL MSA	2,406	15.97	1.20	0.21	20.78	10.97	47.79	50.21	30.24	38.61	17.18	12.50	17.17	16.91	17.59
Montgomery, AL MSA	1,302	8.64	4.07	0.46	17.55	5.91	49.52	43.32	28.86	50.31	17.87	14.29	22.71	15.83	19.61
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	211	1.40	3.53	0.95	12.90	7.58	60.73	58.29	22.83	33.18	14.93	20.00	25.00	12.94	17.94
Auburn-Opelika, AL MSA	783	5.20	1.66	3.83	15.26	11.62	63.50	64.24	19.57	20.31	20.27	25.25	12.23	22.75	18.28
Baldwin County, AL Non-Metro	754	5.00	0.00	0.00	1.94	0.27	45.99	31.43	52.07	68.30	14.69	0.00	28.57	15.39	14.32
Cullman-Marshall, AL Non-Metro	341	2.26	0.00	0.00	0.00	0.00	82.86	76.25	17.14	23.75	13.81	0.00	0.00	13.27	15.78
Dallas County, AL Non-Metro	58	0.39	9.34	0.00	32.75	10.34	48.09	65.52	9.82	24.14	18.59	0.00	10.00	22.12	18.18
Decatur, AL MSA	729	4.84	1.41	0.14	17.55	13.17	53.95	43.35	27.10	43.35	21.63	50.00	20.70	19.60	24.47
Dothan, AL MSA	593	3.94	0.77	0.17	18.97	7.42	63.26	58.18	17.01	34.23	20.93	25.00	18.80	21.61	20.15
Eastern Central AL Non-Metro	283	1.88	0.00	0.00	2.80	1.41	86.58	74.20	10.61	24.38	14.97	0.00	21.43	13.83	18.92
Florence-Muscle Shoals, AL MSA	399	2.65	1.63	0.25	12.69	8.27	62.06	54.39	23.62	37.09	12.15	20.00	10.14	11.79	13.21
Gadsden, AL MSA	259	1.72	1.57	0.77	17.35	6.95	55.52	50.97	25.56	41.31	14.12	5.88	9.01	15.81	13.88
Marion County, AL Non-Metro	50	0.33	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.56	0.00	0.00	15.56	0.00
Mobile, AL MSA	1,283	8.52	4.91	0.39	11.89	3.35	51.55	49.10	31.65	47.16	17.64	8.33	16.77	17.79	17.65
Southeastern AL Non-Metro	571	3.79	0.00	0.00	17.88	11.38	70.58	54.29	11.54	34.33	18.82	0.00	18.78	18.25	19.80
Tuscaloosa, AL MSA	818	5.43	0.05	0.00	28.98	13.08	48.60	49.02	22.38	37.90	17.29	0.00	17.19	17.34	17.25

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: ALABAMA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	286	25.93	2.24	2.80	22.80	16.08	42.47	40.91	32.49	40.21	11.65	35.71	11.16	10.22	13.10
Huntsville, AL MSA	144	13.06	1.20	0.00	20.78	13.19	47.79	45.83	30.24	40.97	5.55	0.00	3.80	4.91	7.64
Montgomery, AL MSA	82	7.43	4.07	1.22	17.55	10.98	49.52	58.54	28.86	29.27	6.82	0.00	11.63	5.68	11.21
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	35	3.17	3.53	5.71	12.90	0.00	60.73	77.14	22.83	17.14	2.50	50.00	0.00	1.80	10.81
Auburn-Opelika, AL MSA	34	3.08	1.66	0.00	15.26	5.88	63.50	73.53	19.57	20.59	9.38	0.00	4.35	11.88	5.71
Baldwin County, AL Non-Metro	34	3.08	0.00	0.00	1.94	2.94	45.99	44.12	52.07	52.94	9.68	0.00	33.33	8.05	10.42
Cullman-Marshall, AL Non-Metro	65	5.89	0.00	0.00	0.00	0.00	82.86	86.15	17.14	13.85	17.02	0.00	0.00	17.22	16.22
Dallas County, AL Non-Metro	12	1.09	9.34	8.33	32.75	33.33	48.09	58.33	9.82	0.00	12.50	0.00	23.08	12.50	0.00
Decatur, AL MSA	47	4.26	1.41	0.00	17.55	12.77	53.95	36.17	27.10	51.06	5.79	0.00	6.10	4.47	8.62
Dothan, AL MSA	59	5.35	0.77	0.00	18.97	8.47	63.26	77.97	17.01	13.56	10.26	0.00	0.76	18.57	12.20
Eastern Central AL Non-Metro	39	3.54	0.00	0.00	2.80	0.00	86.58	82.05	10.61	17.95	12.38	0.00	0.00	11.43	19.23
Florence-Muscle Shoals, AL MSA	31	2.81	1.63	3.23	12.69	9.68	62.06	45.16	23.62	41.94	5.14	16.67	1.92	4.63	8.77
Gadsden, AL MSA	35	3.17	1.57	2.86	17.35	11.43	55.52	45.71	25.56	40.00	8.48	100.00	21.05	5.44	10.53
Marion County, AL Non-Metro	4	0.36	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
Mobile, AL MSA	86	7.80	4.91	1.16	11.89	5.81	51.55	59.30	31.65	33.72	11.23	0.00	18.52	9.58	14.53
Southeastern AL Non-Metro	57	5.17	0.00	0.00	17.88	12.28	70.58	71.93	11.54	15.79	14.41	0.00	8.82	15.86	13.95
Tuscaloosa, AL MSA	53	4.81	0.05	0.00	28.98	28.30	48.60	45.28	22.38	26.42	9.97	0.00	5.71	16.25	16.67

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: ALABAMA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	6,225	29.61	2.24	0.51	22.80	6.15	42.47	37.29	32.49	56.05	17.68	15.56	16.79	16.82	18.44
Huntsville, AL MSA	3,690	17.55	1.20	0.08	20.78	8.37	47.79	45.42	30.24	46.12	17.68	2.50	15.97	17.44	18.46
Montgomery, AL MSA	1,738	8.27	4.07	0.52	17.55	3.57	49.52	45.74	28.86	50.17	16.22	26.92	13.54	16.92	15.73
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	356	1.69	3.53	1.12	12.90	5.34	60.73	61.80	22.83	31.74	12.45	14.29	9.76	12.33	13.14
Auburn-Opelika, AL MSA	764	3.63	1.66	1.96	15.26	13.22	63.50	56.15	19.57	28.66	16.38	18.52	14.20	17.18	15.62
Baldwin County, AL Non-Metro	832	3.96	0.00	0.00	1.94	0.48	45.99	29.57	52.07	69.95	13.86	0.00	9.09	12.81	14.39
Cullman-Marshall, AL Non-Metro	782	3.72	0.00	0.00	0.00	0.00	82.86	79.41	17.14	20.59	15.54	0.00	0.00	15.93	14.08
Dallas County, AL Non-Metro	68	0.32	9.34	1.47	32.75	23.53	48.09	55.88	9.82	19.12	18.41	33.33	38.46	13.85	19.05
Decatur, AL MSA	893	4.25	1.41	0.00	17.55	10.30	53.95	42.44	27.10	47.26	18.33	0.00	17.81	16.90	20.25
Dothan, AL MSA	706	3.36	0.77	0.14	18.97	7.65	63.26	54.53	17.01	37.68	15.50	0.00	9.79	15.02	18.54
Eastern Central AL Non-Metro	551	2.62	0.00	0.00	2.80	0.54	86.58	79.13	10.61	20.33	13.33	0.00	9.09	14.00	11.13
Florence-Muscle Shoals, AL MSA	683	3.25	1.63	0.29	12.69	4.54	62.06	59.30	23.62	35.87	12.17	9.09	5.20	12.23	14.20
Gadsden, AL MSA	486	2.31	1.57	0.21	17.35	6.38	55.52	46.71	25.56	46.71	16.35	0.00	15.38	16.82	16.29
Marion County, AL Non-Metro	93	0.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.65	0.00	0.00	15.65	0.00
Mobile, AL MSA	1,492	7.10	4.91	0.27	11.89	2.95	51.55	40.75	31.65	56.03	16.65	4.17	15.00	15.28	18.07
Southeastern AL Non-Metro	758	3.61	0.00	0.00	17.88	12.40	70.58	58.05	11.54	29.55	16.55	0.00	17.88	16.27	16.62
Tuscaloosa, AL MSA	905	4.31	0.05	0.00	28.98	10.61	48.60	47.51	22.38	41.88	14.46	0.00	11.64	13.53	16.69

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: ALABAMA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	5	25.00	14.56	20.00	23.25	20.00	31.21	40.00	30.98	20.00	6.52	0.00	7.69	5.00	8.33
Huntsville, AL MSA	0	0.00	10.43	0.00	44.68	0.00	27.32	0.00	17.57	0.00	0.00	0.00	0.00	0.00	0.00
Montgomery, AL MSA	6	30.00	16.74	16.67	13.57	0.00	33.19	0.00	36.50	83.33	26.67	0.00	0.00	0.00	40.00
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	0	0.00	23.26	0.00	20.04	0.00	26.21	0.00	30.50	0.00	0.00	0.00	0.00	0.00	0.00
Auburn-Opelika, AL MSA	3	15.00	31.36	0.00	8.53	0.00	51.63	100.00	8.47	0.00	10.00	0.00	0.00	16.67	0.00
Baldwin County, AL Non-Metro	0	0.00	0.00	0.00	1.00	0.00	7.15	0.00	91.85	0.00	0.00	0.00	0.00	0.00	0.00
Cullman-Marshall, AL Non-Metro	0	0.00	0.00	0.00	0.00	0.00	86.20	0.00	13.80	0.00	0.00	0.00	0.00	0.00	0.00
Dallas County, AL Non-Metro	0	0.00	19.20	0.00	17.75	0.00	58.70	0.00	4.35	0.00	0.00	0.00	0.00	0.00	0.00
Decatur, AL MSA	0	0.00	0.51	0.00	36.14	0.00	39.96	0.00	23.39	0.00	0.00	0.00	0.00	0.00	0.00
Dothan, AL MSA	0	0.00	6.60	0.00	15.21	0.00	37.62	0.00	40.58	0.00	0.00	0.00	0.00	0.00	0.00
Eastern Central AL Non-Metro	0	0.00	0.00	0.00	6.68	0.00	80.99	0.00	12.34	0.00	33.33	0.00	0.00	0.00	100.00
Florence-Muscle Shoals, AL MSA	2	10.00	0.54	0.00	12.58	50.00	47.60	50.00	39.29	0.00	0.00	0.00	0.00	0.00	0.00
Gadsden, AL MSA	0	0.00	3.45	0.00	19.24	0.00	50.51	0.00	26.80	0.00	0.00	0.00	0.00	0.00	0.00
Marion County, AL Non-Metro	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
Mobile, AL MSA	4	20.00	6.92	0.00	14.06	0.00	46.74	25.00	32.28	75.00	25.00	0.00	0.00	33.33	50.00
Southeastern AL Non-Metro	0	0.00	0.00	0.00	23.38	0.00	54.79	0.00	21.83	0.00	0.00	0.00	0.00	0.00	0.00
Tuscaloosa, AL MSA	0	0.00	4.02	0.00	41.52	0.00	41.49	0.00	12.97	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: ALABAMA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Birmingham-Hoover, AL MSA	2,05	31.4	7.35	7.74	16.1	11.6	37.8	30.3	38.6	50.2	7.0	7.5	6.4	7.1	7.3
Huntsville, AL MSA	620	9.5	6.28	9.35	21.2	14.6	43.1	36.1	29.2	39.8	5.7	5.3	4.5	4.9	7.5
Montgomery, AL MSA	500	7.6	9.56	9.60	12.7	11.6	42.6	37.2	35.0	41.6	5.7	3.1	9.8	6.1	5.5
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	195	2.9	3.36	2.56	19.9	23.5	53.8	51.7	22.7	22.0	10.0	9.3	12.5	10.7	7.2
Auburn-Opelika, AL MSA	204	3.1	8.49	6.86	11.5	11.2	62.2	59.8	17.6	22.0	9.9	11.7	10.2	10.3	9.0
Baldwin County, AL Non-Metro	381	5.8	0.00	0.00	1.16	1.31	39.3	35.1	59.5	63.5	7.6	0.0	8.1	9.1	7.4
Cullman-Marshall, AL Non-Metro	232	3.5	0.00	0.00	0.00	0.00	82.3	74.1	17.6	25.8	7.7	0.0	0.0	7.6	9.5
Dallas County, AL Non-Metro	85	1.3	17.0	16.4	29.7	27.0	44.8	50.5	8.24	5.88	13.8	15.5	21.1	11.2	5.0
Decatur, AL MSA	145	2.2	1.09	0.00	23.1	22.0	49.7	52.4	26.0	25.5	4.7	0.0	4.4	5.7	4.0
Dothan, AL MSA	317	4.8	5.38	5.99	19.4	18.9	51.6	45.1	23.5	29.9	9.0	16.8	9.3	9.2	7.8
Eastern Central AL Non-Metro	240	3.6	0.00	0.00	2.18	0.00	85.5	74.1	12.3	25.8	13.3	0.0	0.0	13.1	19.0
Florence-Muscle Shoals, AL MSA	165	2.5	1.54	0.00	17.8	20.6	55.6	42.4	25.0	36.9	5.2	0.0	4.5	4.5	7.4
Gadsden, AL MSA	159	2.4	2.55	8.18	15.6	10.0	53.9	55.3	27.9	26.4	9.7	18.1	10.4	11.5	7.3
Marion County, AL Non-Metro	37	0.5	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	15.2	0.0	0.0	17.3	0.0
Mobile, AL MSA	604	9.2	7.34	5.96	9.46	11.5	50.1	49.1	33.0	33.2	5.9	5.0	6.3	6.7	5.4
Southeastern AL Non-Metro	342	5.2	0.00	0.00	22.8	22.5	65.1	64.9	11.9	12.5	16.8	0.0	20.3	18.9	11.9
Tuscaloosa, AL MSA	245	3.7	1.83	1.63	31.7	31.0	43.5	33.8	22.8	33.4	4.6	12.3	3.9	4.3	5.3

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms															
Geography: ALABAMA															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
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>															
Birmingham-Hoover, AL MSA	16	15.24	2.42	18.75	15.90	31.25	47.78	25.00	33.90	25.00	13.33	100.00	13.04	5.41	25.00
Huntsville, AL MSA	4	3.81	3.25	50.00	16.10	0.00	56.38	0.00	24.27	50.00	2.02	50.00	0.00	0.00	10.00
Montgomery, AL MSA	15	14.29	2.87	0.00	13.04	0.00	53.08	60.00	31.01	40.00	11.11	0.00	0.00	20.00	15.00
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	4	3.81	2.80	0.00	11.20	0.00	69.20	100.00	16.80	0.00	28.57	0.00	0.00	33.33	0.00
Auburn-Opelika, AL MSA	3	2.86	3.14	0.00	19.16	0.00	56.10	66.67	21.60	33.33	18.18	0.00	0.00	14.29	50.00
Baldwin County, AL Non-Metro	9	8.57	0.00	0.00	1.28	0.00	51.84	55.56	46.88	44.44	38.10	0.00	0.00	33.33	50.00
Cullman-Marshall, AL Non-Metro	11	10.48	0.00	0.00	0.00	0.00	84.34	100.00	15.66	0.00	8.47	0.00	0.00	10.87	0.00
Dallas County, AL Non-Metro	2	1.90	6.73	0.00	42.31	50.00	40.38	50.00	10.58	0.00	6.25	0.00	0.00	10.00	0.00
Decatur, AL MSA	3	2.86	0.40	0.00	13.13	66.67	65.86	33.33	20.61	0.00	2.47	0.00	14.29	0.00	0.00
Dothan, AL MSA	10	9.52	0.79	0.00	21.86	40.00	66.48	60.00	10.87	0.00	3.13	0.00	5.41	2.81	0.00
Eastern Central AL Non-Metro	4	3.81	0.00	0.00	0.20	0.00	92.23	100.00	7.57	0.00	25.00	0.00	0.00	30.00	0.00
Florence-Muscle Shoals, AL MSA	0	0.00	0.43	0.00	11.21	0.00	67.67	0.00	20.69	0.00	0.00	0.00	0.00	0.00	0.00
Gadsden, AL MSA	3	2.86	0.46	0.00	10.60	66.67	63.59	33.33	25.35	0.00	0.00	0.00	0.00	0.00	0.00
Marion County, AL Non-Metro	2	1.90	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.33	0.00	0.00	8.33	0.00
Mobile, AL MSA	1	0.95	2.62	0.00	6.54	0.00	57.72	100.00	33.12	0.00	0.00	0.00	0.00	0.00	0.00
Southeastern AL Non-Metro	13	12.38	0.00	0.00	14.42	23.08	74.76	46.15	10.82	30.77	12.50	0.00	33.33	10.26	17.65
Tuscaloosa, AL MSA	5	4.76	0.35	0.00	34.39	0.00	42.86	80.00	22.40	20.00	6.82	0.00	0.00	13.04	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: ALABAMA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	4,226	28.05	21.70	12.01	17.49	26.35	20.37	25.98	40.44	35.66	18.60	17.09	16.74	19.23	20.14
Huntsville, AL MSA	2,406	15.97	21.15	14.33	17.80	20.03	21.00	22.39	40.05	43.25	18.02	14.95	14.54	17.71	21.97
Montgomery, AL MSA	1,302	8.64	21.92	10.91	17.03	24.24	21.00	26.59	40.05	38.26	18.68	18.00	17.52	19.30	19.34
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	211	1.40	21.37	8.42	17.29	27.89	22.35	31.58	39.00	32.11	14.91	11.11	13.84	15.06	16.80
Auburn-Opelika, AL MSA	783	5.20	22.62	7.68	16.19	21.43	21.70	34.50	39.49	36.39	21.22	18.13	19.91	25.55	19.49
Baldwin County, AL Non-Metro	754	5.00	12.58	2.41	12.97	14.87	20.52	23.23	53.94	59.49	15.11	12.31	15.44	17.01	14.50
Cullman-Marshall, AL Non-Metro	341	2.26	18.02	7.21	16.67	20.69	22.92	25.08	42.38	47.02	14.39	8.81	12.43	13.52	17.53
Dallas County, AL Non-Metro	58	0.39	34.92	12.96	14.52	24.07	16.53	20.37	34.03	42.59	19.64	31.58	14.00	15.00	23.73
Decatur, AL MSA	729	4.84	20.49	17.58	18.46	30.72	21.04	25.41	40.01	26.29	21.16	24.55	23.30	19.85	18.71
Dothan, AL MSA	593	3.94	22.55	8.79	16.66	20.93	20.39	24.86	40.40	45.42	20.35	18.55	18.87	19.95	21.75
Eastern Central AL Non-Metro	283	1.88	20.88	4.21	17.16	13.03	21.98	22.61	39.98	60.15	15.03	9.59	10.92	14.68	17.65
Florence-Muscle Shoals, AL MSA	399	2.65	20.76	11.43	17.89	24.16	21.58	26.23	39.76	38.18	13.52	13.92	11.01	14.17	14.52
Gadsden, AL MSA	259	1.72	20.79	12.50	18.01	22.92	20.67	25.42	40.53	39.17	14.91	17.31	14.76	14.71	14.47
Marion County, AL Non-Metro	50	0.33	21.85	6.38	19.85	23.40	23.54	36.17	34.75	34.04	16.00	12.50	12.77	20.59	14.49
Mobile, AL MSA	1,283	8.52	23.72	8.75	15.73	23.21	19.92	26.61	40.63	41.43	16.61	17.56	15.45	14.48	18.98
Southeastern AL Non-Metro	571	3.79	21.37	4.05	17.44	11.60	21.10	25.41	40.09	58.93	19.77	15.52	13.79	18.59	21.91
Tuscaloosa, AL MSA	818	5.43	22.68	8.04	17.13	26.27	19.66	24.13	40.53	41.55	19.38	17.41	20.44	18.00	20.08

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.2% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: ALABAMA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	286	25.93	21.70	14.34	17.49	23.90	20.37	27.57	40.44	34.19	11.32	8.76	11.29	13.76	10.67
Huntsville, AL MSA	144	13.06	21.15	11.97	17.80	14.08	21.00	20.42	40.05	53.52	5.51	3.79	2.38	5.06	9.82
Montgomery, AL MSA	82	7.43	21.92	7.69	17.03	25.64	21.00	25.64	40.05	41.03	6.61	2.05	6.22	8.82	8.56
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	35	3.17	21.37	17.14	17.29	20.00	22.35	31.43	39.00	31.43	2.55	2.33	3.52	1.90	2.47
Auburn-Opelika, AL MSA	34	3.08	22.62	8.82	16.19	17.65	21.70	35.29	39.49	38.24	9.80	0.00	5.26	20.00	11.11
Baldwin County, AL Non-Metro	34	3.08	12.58	9.38	12.97	12.50	20.52	15.63	53.94	62.50	9.20	7.14	8.82	5.00	11.63
Cullman-Marshall, AL Non-Metro	65	5.89	18.02	10.77	16.67	9.23	22.92	33.85	42.38	46.15	17.39	23.81	6.67	17.02	19.77
Dallas County, AL Non-Metro	12	1.09	34.92	0.00	14.52	8.33	16.53	41.67	34.03	50.00	12.77	0.00	0.00	13.33	26.67
Decatur, AL MSA	47	4.26	20.49	4.35	18.46	28.26	21.04	21.74	40.01	45.65	5.68	1.22	8.33	3.57	7.94
Dothan, AL MSA	59	5.35	22.55	11.86	16.66	16.95	20.39	28.81	40.40	42.37	10.67	4.00	7.69	13.70	12.80
Eastern Central AL Non-Metro	39	3.54	20.88	7.69	17.16	10.26	21.98	23.08	39.98	58.97	12.82	5.56	2.70	15.09	17.24
Florence-Muscle Shoals, AL MSA	31	2.81	20.76	3.23	17.89	19.35	21.58	29.03	39.76	48.39	5.47	1.82	6.25	6.90	5.62
Gadsden, AL MSA	35	3.17	20.79	17.14	18.01	25.71	20.67	31.43	40.53	25.71	8.80	20.00	10.81	10.77	4.26
Marion County, AL Non-Metro	4	0.36	21.85	0.00	19.85	0.00	23.54	50.00	34.75	50.00	8.70	0.00	0.00	16.67	9.09
Mobile, AL MSA	86	7.80	23.72	12.20	15.73	21.95	19.92	28.05	40.63	37.80	11.32	17.02	11.11	10.77	10.24
Southeastern AL Non-Metro	57	5.17	21.37	7.02	17.44	24.56	21.10	22.81	40.09	45.61	15.02	0.00	26.47	11.63	15.65
Tuscaloosa, AL MSA	53	4.81	22.68	12.50	17.13	18.75	19.66	31.25	40.53	37.50	8.63	0.00	6.33	10.96	11.58

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ALABAMA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Birmingham-Hoover, AL MSA	6,225	29.61	21.70	5.17	17.49	15.78	20.37	23.65	40.44	55.40	18.70	16.09	17.79	18.19	19.54
Huntsville, AL MSA	3,690	17.55	21.15	7.00	17.80	14.87	21.00	20.77	40.05	57.36	18.76	16.54	17.42	18.62	19.60
Montgomery, AL MSA	1,738	8.27	21.92	4.74	17.03	15.05	21.00	24.33	40.05	55.88	18.07	12.50	17.85	17.70	18.95
<b>Limited Review:</b>															
Anniston-Oxford, AL MSA	356	1.69	21.37	5.67	17.29	11.67	22.35	29.33	39.00	53.33	12.94	16.67	9.62	10.98	14.54
Auburn-Opelika, AL MSA	764	3.63	22.62	3.03	16.19	16.54	21.70	24.43	39.49	55.99	17.67	7.92	17.83	18.07	18.43
Baldwin County, AL Non-Metro	832	3.96	12.58	2.32	12.97	7.09	20.52	17.33	53.94	73.26	15.47	14.52	10.66	13.83	16.40
Cullman-Marshall, AL Non-Metro	782	3.72	18.02	3.72	16.67	12.12	22.92	22.45	42.38	61.71	16.40	10.79	12.98	16.98	17.67
Dallas County, AL Non-Metro	68	0.32	34.92	3.23	14.52	9.68	16.53	22.58	34.03	64.52	19.75	33.33	19.05	17.95	19.79
Decatur, AL MSA	893	4.25	20.49	4.83	18.46	17.35	21.04	26.89	40.01	50.93	19.23	12.26	19.95	19.00	20.09
Dothan, AL MSA	706	3.36	22.55	4.78	16.66	15.98	20.39	22.24	40.40	57.00	16.58	10.42	17.59	16.39	17.22
Eastern Central AL Non-Metro	551	2.62	20.88	3.97	17.16	12.10	21.98	22.02	39.98	61.90	14.86	16.05	13.11	14.33	15.32
Florence-Muscle Shoals, AL MSA	683	3.25	20.76	5.66	17.89	14.98	21.58	24.46	39.76	54.89	13.46	10.00	12.29	14.54	13.88
Gadsden, AL MSA	486	2.31	20.79	3.41	18.01	16.14	20.67	29.32	40.53	51.14	18.64	15.79	21.82	19.50	17.56
Marion County, AL Non-Metro	93	0.44	21.85	3.49	19.85	18.60	23.54	29.07	34.75	48.84	16.35	4.35	16.22	16.22	18.60
Mobile, AL MSA	1,492	7.10	23.72	4.23	15.73	12.76	19.92	25.60	40.63	57.42	17.18	14.02	16.22	16.99	17.73
Southeastern AL Non-Metro	758	3.61	21.37	3.11	17.44	10.99	21.10	19.23	40.09	66.67	15.83	12.70	16.97	15.00	16.09
Tuscaloosa, AL MSA	905	4.31	22.68	3.11	17.13	14.51	19.66	24.74	40.53	57.64	15.34	10.00	16.34	15.28	15.51

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 13.1% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ALABAMA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Birmingham-Hoover, AL MSA	2,053	31.47	68.03	62.20	90.84	5.02	4.14	7.01	12.49	
Huntsville, AL MSA	620	9.50	67.03	59.35	87.58	5.32	7.10	5.73	9.19	
Montgomery, AL MSA	500	7.66	66.09	51.60	84.40	7.00	8.60	5.79	8.87	
<b>Limited Review:</b>										
Anniston-Oxford, AL MSA	195	2.99	69.24	51.79	83.59	10.26	6.15	10.03	15.56	
Auburn-Opelika, AL MSA	204	3.13	68.18	67.16	93.63	3.92	2.45	9.90	16.16	
Baldwin County, AL Non-Metro	381	5.84	68.80	61.68	82.94	11.02	6.04	7.61	12.18	
Cullman-Marshall, AL Non-Metro	232	3.56	69.56	59.05	89.22	5.17	5.60	7.72	16.86	
Dallas County, AL Non-Metro	85	1.30	68.75	55.29	87.06	8.24	4.71	13.81	22.49	
Decatur, AL MSA	145	2.22	70.47	58.62	86.21	8.28	5.52	4.73	7.12	
Dothan, AL MSA	317	4.86	68.29	59.94	83.60	7.89	8.52	9.09	14.59	
Eastern Central AL Non-Metro	240	3.68	71.33	55.83	87.08	9.58	3.33	13.35	22.79	
Florence-Muscle Shoals, AL MSA	165	2.53	69.83	50.30	78.18	13.94	7.88	5.20	6.15	
Gadsden, AL MSA	159	2.44	69.81	55.97	83.65	12.58	3.77	9.79	19.44	
Marion County, AL Non-Metro	37	0.57	71.74	62.16	83.78	10.81	5.41	15.22	28.99	
Mobile, AL MSA	604	9.26	65.96	60.60	88.25	5.96	5.79	5.98	10.62	
Southeastern AL Non-Metro	342	5.24	68.21	65.20	87.72	8.77	3.51	16.86	29.74	
Tuscaloosa, AL MSA	245	3.76	68.77	58.37	84.90	10.20	4.90	4.60	6.95	

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 20.3% 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: ALABAMA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Birmingham-Hoover, AL MSA	16	15.24	96.62	75.00	75.00	6.25	18.75	13.33	14.58	
Huntsville, AL MSA	4	3.81	97.08	50.00	100.00	0.00	0.00	2.02	1.25	
Montgomery, AL MSA	15	14.29	97.02	66.67	73.33	0.00	26.67	11.11	11.29	
<b>Limited Review:</b>										
Anniston-Oxford, AL MSA	4	3.81	98.00	100.00	100.00	0.00	0.00	28.57	66.67	
Auburn-Opelika, AL MSA	3	2.86	97.21	33.33	100.00	0.00	0.00	18.18	12.50	
Baldwin County, AL Non-Metro	9	8.57	95.84	66.67	77.78	11.11	11.11	38.10	50.00	
Cullman-Marshall, AL Non-Metro	11	10.48	97.88	72.73	81.82	18.18	0.00	8.47	12.82	
Dallas County, AL Non-Metro	2	1.90	93.27	50.00	100.00	0.00	0.00	6.25	0.00	
Decatur, AL MSA	3	2.86	97.78	100.00	100.00	0.00	0.00	2.47	2.70	
Dothan, AL MSA	10	9.52	98.30	80.00	90.00	0.00	10.00	3.13	2.62	
Eastern Central AL Non-Metro	4	3.81	97.96	50.00	75.00	25.00	0.00	25.00	28.57	
Florence-Muscle Shoals, AL MSA	0	0.00	98.28	0.00	0.00	0.00	0.00	0.00	0.00	
Gadsden, AL MSA	3	2.86	99.08	100.00	100.00	0.00	0.00	0.00	0.00	
Marion County, AL Non-Metro	2	1.90	100.00	50.00	100.00	0.00	0.00	8.33	0.00	
Mobile, AL MSA	1	0.95	96.86	0.00	100.00	0.00	0.00	0.00	0.00	
Southeastern AL Non-Metro	13	12.38	97.36	69.23	84.62	7.69	7.69	12.50	18.42	
Tuscaloosa, AL MSA	5	4.76	97.71	80.00	40.00	0.00	60.00	6.82	12.50	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 21.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ALABAMA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Birmingham-Hoover, AL MSA	4	11,954	77	17,595	81	29,548	47.91	0	0
Huntsville, AL MSA	0	0	24	5,582	24	5,582	9.05	0	0
Montgomery, AL MSA	2	116	19	10,976	21	11,092	17.99	0	0
<b>Limited Review:</b>									
Anniston-Oxford, AL MSA	0	0	2	13	2	13	0.02	0	0
Auburn-Opelika, AL MSA	0	0	6	32	6	32	0.05	0	0
Baldwin County, AL Non-Metro	2	5,478	0	0	2	5,478	8.88	0	0
Cullman-Marshall, AL Non-Metro	0	0	3	6	3	6	0.01	0	0
Dallas County, AL Non-Metro	0	0	1	2	1	2	0.00	0	0
Decatur, AL MSA	0	0	2	11	2	11	0.02	0	0
Dothan, AL MSA	0	0	4	17	4	17	0.03	0	0
Eastern Central AL Non-Metro	1	59	1	3	2	62	0.10	0	0
Florence-Muscle Shoals, AL MSA	0	0	6	124	6	124	0.20	0	0
Gadsden, AL MSA	0	0	4	25	4	25	0.04	0	0
Marion County, AL Non-Metro	0	0	3	3	3	3	0.00	0	0
Mobile, AL MSA	2	8,953	12	123	14	9,076	14.72	0	0
Southeastern AL Non-Metro	1	560	0	0	1	560	0.91	0	0
Tuscaloosa, AL MSA	0	0	3	40	3	40	0.06	0	0
<b>Statewide:</b>									
Alabama Statewide	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: ALABAMA		Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Birmingham-Hoover, AL MSA	42.54	36	26.47	19.44	11.11	36.11	33.33	1	2	0	0	-1	0	6.88	21.85	40.39	30.88
Huntsville, AL MSA	6.81	8	5.88	12.50	25.00	25.00	37.50	0	0	0	0	0	0	8.34	25.71	36.81	29.14
Montgomery, AL MSA	10.32	12	8.82	16.67	16.67	16.67	50.00	0	0	0	0	0	0	10.20	18.50	39.08	32.22
Limited Review:																	
Anniston-Oxford, AL MSA	3.30	5	3.68	0.00	40.00	60.00	0.00	0	0	0	0	0	0	5.87	19.90	46.14	28.08
Auburn-Opelika, AL MSA	1.64	4	2.94	0.00	25.00	50.00	25.00	0	0	0	0	0	0	5.92	15.01	58.46	20.60
Baldwin County, AL Non-Metro	4.57	7	5.15	0.00	0.00	42.86	57.14	0	0	0	0	0	0	0.00	1.82	40.20	57.98
Cullman-Marshall, AL Non-Metro	3.48	6	4.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	8.14	63.85	28.01
Dallas County, AL Non-Metro	0.79	2	1.47	50.00	0.00	50.00	0.00	0	0	0	0	0	0	25.19	22.29	22.85	29.66
Decatur, AL MSA	1.49	3	2.21	0.00	66.67	33.33	0.00	0	0	0	0	0	0	2.29	17.72	56.86	23.12
Dothan, AL MSA	4.73	9	6.62	0.00	22.22	55.56	22.22	0	1	-1	0	0	0	1.70	17.19	59.23	21.88
Eastern Central AL Non-Metro	1.80	5	3.68	0.00	0.00	100.00	0.00	0	0	0	0	0	0	1.76	18.65	66.51	13.08
Florence-Muscle Shoals, AL MSA	1.88	4	2.94	25.00	25.00	50.00	0.00	0	0	0	0	0	0	5.17	10.23	66.32	18.28
Gadsden, AL MSA	2.08	4	2.94	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.57	27.01	38.51	31.91
Marion County, AL Non-Metro	1.00	3	2.21	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	14.48	85.52	0.00
Mobile, AL MSA	6.48	13	9.56	0.00	30.77	38.46	30.77	0	0	0	0	0	0	6.34	23.70	39.08	30.70
Southeastern AL Non-Metro	4.75	9	6.62	11.11	44.44	44.44	0.00	0	1	0	0	-1	0	1.18	17.73	54.38	26.72
Tuscaloosa, AL MSA	2.35	6	4.41	0.00	50.00	0.00	50.00	0	0	0	0	0	0	10.37	24.35	36.53	28.76

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: ALASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Anchorage, AK MSA	68.15	29,489	7,159,314	8,709	477,322	139	5,004	19	115,224	38,356	7,756,863	53.95
Greater AK Non-Metro	24.31	7,827	1,651,261	5,379	293,771	423	41,812	51	101,342	13,680	2,088,186	37.91
Limited Review:												
Fairbanks, AK MSA	7.54	2,894	604,633	1,327	73,304	17	241	5	13,650	4,243	691,829	8.14

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	12,317	73.33	0.40	0.67	14.34	11.50	56.72	59.38	28.55	28.44	38.22	35.29	37.39	37.10	40.92
Greater AK Non-Metro	2,930	17.44	0.00	0.00	17.46	2.80	61.87	61.88	20.68	35.32	35.76	0.00	32.00	32.62	41.46
<b>Limited Review:</b>															
Fairbanks, AK MSA	1,550	9.23	0.00	0.00	3.01	3.10	68.32	70.65	28.67	26.26	27.60	0.00	20.37	28.85	25.15

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: ALASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	578	56.34	0.40	0.00	14.34	8.65	56.72	57.96	28.55	33.39	24.82	0.00	28.36	26.60	21.32
Greater AK Non-Metro	387	37.72	0.00	0.00	17.46	6.72	61.87	64.86	20.68	28.42	52.94	0.00	80.00	47.24	62.00
<b>Limited Review:</b>															
Fairbanks, AK MSA	61	5.95	0.00	0.00	3.01	1.64	68.32	72.13	28.67	26.23	7.93	0.00	0.00	8.41	7.55

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	16,568	74.13	0.40	0.37	14.34	8.16	56.72	54.57	28.55	36.90	39.37	35.29	37.39	38.19	41.87
Greater AK Non-Metro	4,502	20.14	0.00	0.00	17.46	1.78	61.87	67.44	20.68	30.79	41.68	0.00	47.50	40.70	43.70
<b>Limited Review:</b>															
Fairbanks, AK MSA	1,280	5.73	0.00	0.00	3.01	2.34	68.32	66.02	28.67	31.64	22.08	0.00	16.22	23.13	20.11

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	26	70.27	5.60	7.69	44.61	46.15	43.30	46.15	6.49	0.00	20.00	0.00	33.33	20.00	0.00
Greater AK Non-Metro	8	21.62	0.00	0.00	5.43	0.00	54.84	87.50	39.72	12.50	36.36	0.00	0.00	50.00	33.33
<b>Limited Review:</b>															
Fairbanks, AK MSA	3	8.11	0.00	0.00	30.65	66.67	58.28	33.33	11.06	0.00	14.29	0.00	0.00	20.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Anchorage, AK MSA	8,70	56.5	1.62	1.45	24.9	23.5	50.2	52.3	23.2	22.6	31.3	29.8	36.5	31.0	28.7
Greater AK Non-Metro	5,37	34.8	0.00	0.00	11.8	6.30	66.4	74.1	21.7	19.5	48.2	0.0	70.0	49.9	42.1
<b>Limited Review:</b>															
Fairbanks, AK MSA	1,32	8.6	0.00	0.00	9.12	8.44	67.2	66.8	23.6	24.7	26.6	0.0	31.0	27.6	25.2

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Anchorage, AK MSA	139	24.01	0.62	0.00	18.49	10.79	57.94	63.31	22.96	25.90	61.43	0.00	69.23	53.49	78.57
Greater AK Non-Metro	423	73.06	0.00	0.00	6.95	3.07	74.41	69.74	18.64	27.19	59.67	0.00	50.00	61.99	56.10
<b>Limited Review:</b>															
Fairbanks, AK MSA	17	2.94	0.00	0.00	1.40	0.00	72.03	64.71	26.57	35.29	41.67	0.00	0.00	44.44	33.33

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	12,317	73.33	19.69	6.07	17.76	26.42	24.19	31.71	38.36	35.80	39.25	38.39	38.20	38.52	40.91
Greater AK Non-Metro	2,930	17.44	21.44	3.13	17.44	18.49	21.09	31.72	40.03	46.66	37.69	29.73	36.42	38.27	38.64
<b>Limited Review:</b>															
Fairbanks, AK MSA	1,550	9.23	18.92	4.66	18.79	26.10	22.90	37.95	39.39	31.29	27.05	22.66	30.35	26.65	24.06

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	578	56.34	19.69	6.58	17.76	17.97	24.19	29.00	38.36	46.44	24.91	13.95	16.36	29.20	31.10
Greater AK Non-Metro	387	37.72	21.44	5.32	17.44	15.69	21.09	27.39	40.03	51.60	52.72	57.14	43.90	56.41	54.64
<b>Limited Review:</b>															
Fairbanks, AK MSA	61	5.95	18.92	11.67	18.79	11.67	22.90	23.33	39.39	53.33	7.64	15.79	3.23	5.56	9.43

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Anchorage, AK MSA	16,568	74.13	19.69	4.32	17.76	17.04	24.19	27.76	38.36	50.88	39.49	38.68	36.46	37.38	42.06
Greater AK Non-Metro	4,502	20.14	21.44	3.87	17.44	13.54	21.09	26.44	40.03	56.15	43.60	33.33	39.14	41.40	46.73
<b>Limited Review:</b>															
Fairbanks, AK MSA	1,280	5.73	18.92	4.14	18.79	16.57	22.90	32.68	39.39	46.61	19.06	18.28	15.69	21.33	19.52

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 20.3% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Anchorage, AK MSA	8,709	56.50	65.95	72.80	91.28	4.50	4.21	31.38	41.21	
Greater AK Non-Metro	5,379	34.89	58.96	74.47	90.05	5.82	4.13	48.22	55.91	
<b>Limited Review:</b>										
Fairbanks, AK MSA	1,327	8.61	66.31	72.49	91.26	4.22	4.52	26.64	34.48	

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 9.5% of small loans to businesses originated and purchased by the bank.

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

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: ALASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Anchorage, AK MSA	139	24.01	95.99	89.21	93.53	5.04	1.44	61.43	69.23	
Greater AK Non-Metro	423	73.06	93.39	89.60	67.38	23.17	9.46	59.67	63.73	
Limited Review:										
Fairbanks, AK MSA	17	2.94	97.90	100.00	100.00	0.00	0.00	41.67	45.45	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 2.9% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ALASKA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Anchorage, AK MSA	13	4,074	56	63,142	69	67,216	89.30	0	0
Greater AK Non-Metro	8	2,921	18	4,264	26	7,184	9.54	0	0
<b>Limited Review:</b>									
Fairbanks, AK MSA	1	403	7	469	8	871	1.16	0	0
<b>Statewide:</b>									
Alaska Statewide	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ALASKA								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches ( + or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Anchorage, AK MSA	53.95	18	36.00	0.00	50.00	50.00	0.00	0	1	0	0	0	-1	2.03	24.82	53.76	19.39
Greater AK Non-Metro	37.91	27	54.00	0.00	7.41	66.67	25.93	0	0	0	0	0	0	3.23	17.36	58.76	19.57
Limited Review:																	
Fairbanks, AK MSA	8.14	5	10.00	0.00	40.00	20.00	40.00	0	0	0	0	0	0	3.50	19.17	52.24	25.08

**Table 1. Lending Volume**

LENDING VOLUME				Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Phoenix-Mesa-Glendale, AZ MSA	70.87	119,224	22,168,459	96,501	3,541,914	694	55,619	81	173,945	216,500	25,939,937	72.96
Tucson, AZ MSA	14.45	24,560	4,482,037	19,369	700,133	158	9,491	31	49,176	44,118	5,240,836	14.79
<b>Limited Review:</b>												
Eastern AZ Non-Metro	1.88	3,693	569,912	1,971	66,650	60	7,102	7	13,434	5,731	657,098	1.29
Flagstaff, AZ MSA	2.11	3,770	844,936	2,660	92,095	20	1,964	4	5,720	6,454	944,715	1.49
Lake Havasu City-Kingman, AZ MSA	2.72	5,143	696,141	3,136	93,089	35	1,090	2	4,188	8,316	794,508	2.25
Nogales-Douglas, AZ Non-Metro	2.56	4,880	817,148	2,838	105,122	97	10,569	2	8,716	7,817	941,555	2.22
Prescott, AZ MSA	3.52	5,992	1,065,703	4,719	140,354	52	2,173	2	13,270	10,765	1,221,501	3.20
Western AZ Non-Metro	0.11	148	26,473	154	4,477	20	4,887	1	200	323	36,037	0.13
Yuma, AZ MSA	1.78	3,304	500,025	1,988	65,938	157	16,634	2	10,172	5,451	592,770	1.67

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: ARIZONA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	66,103	75.39	1.63	0.56	24.02	17.50	39.20	45.68	35.14	36.27	23.86	28.51	25.18	25.28	21.65
Tucson, AZ MSA	10,503	11.98	2.25	1.40	24.74	17.00	36.40	34.18	36.61	47.42	20.47	14.01	24.94	18.59	20.45
<b>Limited Review:</b>															
Eastern AZ Non-Metro	1,208	1.38	5.48	0.00	22.02	0.00	54.64	58.86	17.87	41.14	17.66	0.00	0.00	17.98	17.84
Flagstaff, AZ MSA	1,444	1.65	1.04	2.84	18.90	5.26	51.74	62.53	28.33	29.36	25.91	26.56	33.33	25.52	25.61
Lake Havasu City-Kingman, AZ MSA	2,541	2.90	0.00	0.00	9.84	4.21	74.76	77.10	15.40	18.69	30.63	0.00	25.21	31.03	30.19
Nogales-Douglas, AZ Non-Metro	1,909	2.18	0.00	0.00	15.36	3.72	50.83	32.90	33.80	63.38	23.37	0.00	17.12	19.89	26.86
Prescott, AZ MSA	2,403	2.74	0.00	0.00	2.46	1.12	76.79	76.36	20.76	22.51	23.65	0.00	30.23	23.57	23.63
Western AZ Non-Metro	66	0.08	0.00	0.00	64.58	27.27	35.42	72.73	0.00	0.00	32.86	0.00	46.15	29.82	0.00
Yuma, AZ MSA	1,508	1.72	0.00	0.00	14.76	6.50	58.74	44.63	26.50	48.87	18.40	0.00	10.14	22.30	17.23

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	1,994	55.44	1.63	0.60	24.02	16.10	39.20	36.01	35.14	47.29	25.12	6.67	26.56	27.06	23.65
Tucson, AZ MSA	613	17.04	2.25	0.65	24.74	18.92	36.40	33.28	36.61	47.15	16.64	0.00	22.34	21.47	14.29
<b>Limited Review:</b>															
Eastern AZ Non-Metro	184	5.12	5.48	1.63	22.02	8.15	54.64	61.41	17.87	28.80	39.83	100.00	100.00	36.11	26.47
Flagstaff, AZ MSA	87	2.42	1.04	1.15	18.90	10.34	51.74	62.07	28.33	26.44	26.98	0.00	40.00	28.21	21.05
Lake Havasu City-Kingman, AZ MSA	189	5.25	0.00	0.00	9.84	5.29	74.76	77.78	15.40	16.93	34.95	0.00	7.69	41.43	30.00
Nogales-Douglas, AZ Non-Metro	151	4.20	0.00	0.00	15.36	6.62	50.83	41.06	33.80	52.32	34.34	0.00	20.00	39.58	30.43
Prescott, AZ MSA	235	6.53	0.00	0.00	2.46	2.13	76.79	74.47	20.76	23.40	37.50	0.00	66.67	35.59	38.89
Western AZ Non-Metro	7	0.19	0.00	0.00	64.58	42.86	35.42	57.14	0.00	0.00	14.29	0.00	50.00	0.00	0.00
Yuma, AZ MSA	137	3.81	0.00	0.00	14.76	13.14	58.74	46.72	26.50	40.15	31.31	0.00	10.00	40.91	31.43

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	51,038	64.35	1.63	0.37	24.02	10.62	39.20	35.03	35.14	53.98	21.84	25.25	25.37	23.36	20.33
Tucson, AZ MSA	13,426	16.93	2.25	0.45	24.74	11.81	36.40	30.00	36.61	57.73	20.78	13.04	24.85	20.87	20.06
<b>Limited Review:</b>															
Eastern AZ Non-Metro	2,300	2.90	5.48	1.83	22.02	7.83	54.64	51.22	17.87	39.13	30.24	97.67	98.35	22.02	25.87
Flagstaff, AZ MSA	2,239	2.82	1.04	1.16	18.90	3.17	51.74	61.55	28.33	34.12	22.19	35.71	16.51	23.23	20.61
Lake Havasu City-Kingman, AZ MSA	2,413	3.04	0.00	0.00	9.84	3.15	74.76	75.92	15.40	20.93	25.96	0.00	24.18	25.98	26.16
Nogales-Douglas, AZ Non-Metro	2,818	3.55	0.00	0.00	15.36	5.50	50.83	33.22	33.80	61.28	25.62	0.00	27.94	26.22	25.15
Prescott, AZ MSA	3,353	4.23	0.00	0.00	2.46	1.07	76.79	71.79	20.76	27.14	22.19	0.00	32.56	22.61	20.73
Western AZ Non-Metro	75	0.09	0.00	0.00	64.58	25.33	35.42	74.67	0.00	0.00	19.47	0.00	35.00	16.13	0.00
Yuma, AZ MSA	1,656	2.09	0.00	0.00	14.76	10.45	58.74	44.93	26.50	44.63	24.83	0.00	31.25	23.19	25.53

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	33	57.89	6.87	3.03	41.48	45.45	36.08	30.30	15.57	21.21	9.43	10.00	8.00	9.68	13.33
Tucson, AZ MSA	18	31.58	5.05	5.56	38.28	44.44	38.41	16.67	18.26	33.33	15.56	0.00	7.69	25.00	42.86
<b>Limited Review:</b>															
Eastern AZ Non-Metro	1	1.75	1.30	0.00	8.79	0.00	72.18	100.00	17.73	0.00	0.00	0.00	0.00	0.00	0.00
Flagstaff, AZ MSA	0	0.00	15.67	0.00	8.84	0.00	56.32	0.00	19.17	0.00	0.00	0.00	0.00	0.00	0.00
Lake Havasu City-Kingman, AZ MSA	0	0.00	0.00	0.00	2.08	0.00	83.28	0.00	14.64	0.00	0.00	0.00	0.00	0.00	0.00
Nogales-Douglas, AZ Non-Metro	2	3.51	0.00	0.00	21.15	0.00	31.25	50.00	47.60	50.00	0.00	0.00	0.00	0.00	0.00
Prescott, AZ MSA	1	1.75	0.00	0.00	13.37	0.00	66.24	100.00	20.39	0.00	0.00	0.00	0.00	0.00	0.00
Western AZ Non-Metro	0	0.00	0.00	0.00	4.17	0.00	95.83	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Yuma, AZ MSA	2	3.51	0.00	0.00	18.08	0.00	58.69	100.00	23.23	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	96,458	72.37	3.46	3.08	19.49	17.22	32.55	29.11	44.42	50.59	27.00	31.96	25.68	26.44	28.24
Tucson, AZ MSA	19,369	14.53	3.07	2.21	24.95	26.64	33.33	31.11	38.65	40.04	29.69	23.94	29.83	28.27	31.88
<b>Limited Review:</b>															
Eastern AZ Non-Metro	1,971	1.48	0.82	0.30	7.44	2.13	68.77	77.63	22.97	19.94	27.68	64.71	56.96	30.23	26.57
Flagstaff, AZ MSA	2,660	2.00	6.05	6.17	10.49	8.65	55.49	52.29	27.55	32.89	28.76	20.86	39.43	28.00	32.44
Lake Havasu City-Kingman, AZ MSA	3,136	2.35	0.00	0.00	5.03	3.95	78.62	79.88	16.35	16.17	26.91	0.00	43.86	26.42	29.98
Nogales-Douglas, AZ Non-Metro	2,838	2.13	0.00	0.00	16.53	17.02	49.14	40.03	34.33	42.95	35.24	0.00	36.80	32.26	42.37
Prescott, AZ MSA	4,719	3.54	0.00	0.00	5.99	5.93	70.51	64.29	23.50	29.77	23.06	0.00	19.57	24.38	24.43
Western AZ Non-Metro	154	0.12	0.00	0.00	41.85	16.88	58.15	83.12	0.00	0.00	25.29	0.00	36.14	22.88	0.00
Yuma, AZ MSA	1,988	1.49	0.00	0.00	20.41	16.45	44.65	41.65	34.88	41.90	30.25	0.00	26.78	25.48	39.84

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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	694	53.67	2.15	0.72	23.70	27.81	35.73	33.00	38.39	38.47	55.74	81.82	57.14	60.18	57.89
Tucson, AZ MSA	158	12.22	2.45	0.00	24.42	22.15	35.01	37.34	38.13	40.51	64.62	0.00	60.00	61.54	76.92
<b>Limited Review:</b>															
Eastern AZ Non-Metro	60	4.64	0.41	0.00	3.70	1.67	72.69	86.67	23.20	11.67	50.00	0.00	66.67	62.00	42.86
Flagstaff, AZ MSA	20	1.55	4.51	10.00	9.84	0.00	52.46	65.00	32.79	25.00	44.44	100.00	0.00	50.00	0.00
Lake Havasu City-Kingman, AZ MSA	35	2.71	0.00	0.00	8.77	25.71	77.89	71.43	13.33	2.86	61.90	0.00	100.00	66.67	50.00
Nogales-Douglas, AZ Non-Metro	97	7.50	0.00	0.00	6.30	20.62	63.68	65.98	30.02	13.40	54.29	0.00	70.59	46.34	70.00
Prescott, AZ MSA	52	4.02	0.00	0.00	4.55	0.00	68.78	69.23	26.67	30.77	48.72	0.00	0.00	50.00	55.56
Western AZ Non-Metro	20	1.55	0.00	0.00	60.56	35.00	39.44	65.00	0.00	0.00	50.00	0.00	60.00	66.67	0.00
Yuma, AZ MSA	157	12.14	0.00	0.00	16.11	23.57	48.33	56.69	35.36	19.75	80.00	0.00	100.00	74.29	80.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: ARIZONA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	66,150	75.40	19.62	13.74	18.79	25.44	21.81	23.37	39.78	37.45	24.94	27.04	25.36	25.21	23.79
Tucson, AZ MSA	10,503	11.97	20.12	8.32	18.51	20.86	21.13	26.81	40.24	44.01	22.30	21.69	22.52	23.01	21.91
<b>Limited Review:</b>															
Eastern AZ Non-Metro	1,208	1.38	25.74	1.88	16.85	7.70	19.24	18.22	38.17	72.20	18.95	16.46	12.33	15.58	21.61
Flagstaff, AZ MSA	1,444	1.65	22.42	1.91	16.91	13.37	20.66	23.90	40.01	60.82	27.00	26.32	24.67	26.99	27.55
Lake Havasu City-Kingman, AZ MSA	2,541	2.90	16.72	7.05	19.88	16.93	23.98	22.15	39.42	53.87	32.95	37.74	32.48	33.87	31.99
Nogales-Douglas, AZ Non-Metro	1,909	2.18	19.50	2.82	17.34	9.97	19.17	21.19	44.00	66.02	24.74	14.67	19.66	23.59	27.95
Prescott, AZ MSA	2,403	2.74	17.21	8.12	20.02	18.31	23.60	21.80	39.17	51.77	24.49	26.69	21.47	23.40	26.02
Western AZ Non-Metro	66	0.08	23.15	0.00	23.86	12.70	21.83	11.11	31.16	76.19	31.25	0.00	25.00	12.50	39.53
Yuma, AZ MSA	1,508	1.72	19.11	3.68	18.62	15.56	21.71	26.04	40.55	54.72	19.34	13.75	17.03	17.06	22.61

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	1,994	55.44	19.62	7.53	18.79	21.22	21.81	24.28	39.78	46.97	24.92	24.81	31.17	25.08	22.43
Tucson, AZ MSA	613	17.04	20.12	7.67	18.51	21.67	21.13	23.17	40.24	47.50	16.56	15.56	25.00	15.09	13.89
<b>Limited Review:</b>															
Eastern AZ Non-Metro	184	5.12	25.74	6.04	16.85	14.84	19.24	25.82	38.17	53.30	43.12	33.33	40.74	51.85	40.38
Flagstaff, AZ MSA	87	2.42	22.42	6.98	16.91	10.47	20.66	33.72	40.01	48.84	26.23	33.33	0.00	40.91	19.35
Lake Havasu City-Kingman, AZ MSA	189	5.25	16.72	5.88	19.88	21.39	23.98	32.09	39.42	40.64	35.42	33.33	41.18	37.50	32.61
Nogales-Douglas, AZ Non-Metro	151	4.20	19.50	4.70	17.34	10.07	19.17	24.83	44.00	60.40	35.56	25.00	35.71	40.00	34.62
Prescott, AZ MSA	235	6.53	17.21	7.17	20.02	21.97	23.60	25.11	39.17	45.74	33.33	0.00	43.75	33.33	33.33
Western AZ Non-Metro	7	0.19	23.15	0.00	23.86	0.00	21.83	42.86	31.16	57.14	14.29	0.00	0.00	0.00	33.33
Yuma, AZ MSA	137	3.81	19.11	8.96	18.62	16.42	21.71	21.64	40.55	52.99	30.85	42.86	21.05	38.89	30.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ARIZONA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Phoenix-Mesa-Glendale, AZ MSA	51,047	64.35	19.62	5.62	18.79	15.03	21.81	21.76	39.78	57.59	22.81	19.93	22.89	22.93	23.15
Tucson, AZ MSA	13,426	16.92	20.12	4.53	18.51	13.60	21.13	21.49	40.24	60.38	22.95	16.96	20.95	24.42	23.72
<b>Limited Review:</b>															
Eastern AZ Non-Metro	2,300	2.90	25.74	1.92	16.85	7.84	19.24	17.07	38.17	73.17	22.25	20.37	23.53	22.19	22.18
Flagstaff, AZ MSA	2,239	2.82	22.42	1.99	16.91	10.65	20.66	21.51	40.01	65.85	24.43	14.12	26.47	24.25	24.86
Lake Havasu City-Kingman, AZ MSA	2,413	3.04	16.72	5.58	19.88	14.78	23.98	22.32	39.42	57.32	28.81	25.90	29.26	29.31	28.93
Nogales-Douglas, AZ Non-Metro	2,818	3.55	19.50	2.71	17.34	9.18	19.17	19.21	44.00	68.91	27.64	26.67	25.12	28.40	27.91
Prescott, AZ MSA	3,353	4.23	17.21	4.98	20.02	15.51	23.60	23.28	39.17	56.24	24.08	20.78	25.26	24.03	24.21
Western AZ Non-Metro	75	0.09	23.15	0.00	23.86	3.33	21.83	18.33	31.16	78.33	19.78	0.00	14.29	36.36	18.31
Yuma, AZ MSA	1,657	2.09	19.11	2.98	18.62	11.15	21.71	20.17	40.55	65.70	26.11	36.36	22.76	28.04	25.77

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 22.3% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ARIZONA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	96,501	72.37	66.61	73.09	95.68	2.40	1.92	27.00	44.41
Tucson, AZ MSA	19,369	14.53	66.16	72.09	95.55	2.86	1.59	29.69	46.23
<b>Limited Review:</b>									
Eastern AZ Non-Metro	1,971	1.48	65.47	74.28	96.60	1.93	1.47	27.68	48.50
Flagstaff, AZ MSA	2,660	2.00	67.99	74.62	95.41	2.97	1.62	28.76	48.81
Lake Havasu City-Kingman, AZ MSA	3,136	2.35	72.32	79.75	96.62	2.01	1.37	26.91	47.92
Nogales-Douglas, AZ Non-Metro	2,838	2.13	66.90	70.51	96.37	1.59	2.04	35.24	52.05
Prescott, AZ MSA	4,719	3.54	70.45	75.84	97.16	1.91	0.93	23.06	43.66
Western AZ Non-Metro	154	0.12	64.35	67.53	98.70	0.65	0.65	25.29	54.76
Yuma, AZ MSA	1,988	1.49	69.00	76.16	95.82	2.67	1.51	30.25	47.74

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 13.8% 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, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Phoenix-Mesa-Glendale, AZ MSA	694	53.67	95.11	59.94	81.12	9.51	9.37	55.74	80.26
Tucson, AZ MSA	158	12.22	96.63	63.29	90.51	5.06	4.43	64.62	75.86
<b>Limited Review:</b>									
Eastern AZ Non-Metro	60	4.64	97.33	76.67	73.33	10.00	16.67	50.00	74.42
Flagstaff, AZ MSA	20	1.55	96.72	85.00	70.00	15.00	15.00	44.44	66.67
Lake Havasu City-Kingman, AZ MSA	35	2.71	97.19	85.71	97.14	2.86	0.00	61.90	76.92
Nogales-Douglas, AZ Non-Metro	97	7.50	97.01	50.52	69.07	17.53	13.40	54.29	69.70
Prescott, AZ MSA	52	4.02	98.54	50.00	96.15	1.92	1.92	48.72	50.00
Western AZ Non-Metro	20	1.55	88.73	35.00	40.00	5.00	55.00	50.00	50.00
Yuma, AZ MSA	157	12.14	86.19	64.97	72.61	10.19	17.20	80.00	91.67

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 20.5% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ARIZONA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012			
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-Glendale, AZ MSA	38	51,315	213	91,815	251	143,130	61.89	0	0
Tucson, AZ MSA	8	2,865	22	43,121	30	45,986	19.88	0	0
<b>Limited Review:</b>									
Eastern AZ Non-Metro	3	2,257	5	17,501	8	19,758	8.54	0	0
Flagstaff, AZ MSA	0	0	4	30	4	30	0.01	0	0
Lake Havasu City-Kingman, AZ MSA	3	11,460	2	655	5	12,115	5.24	0	0
Nogales-Douglas, AZ Non-Metro	4	2,468	6	28	10	2,497	1.08	0	0
Prescott, AZ MSA	1	769	7	57	8	826	0.36	0	0
Western AZ Non-Metro	0	0	1	3	1	3	0.00	0	0
Yuma, AZ MSA	2	1,625	4	13	6	1,638	0.71	0	0
<b>Statewide:</b>									
Arizona Statewide	3	5,273	2	20	5	5,293	2.29	2	430

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: ARIZONA				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Phoenix-Mesa-Glendale, AZ MSA	72.96	173	66.03	2.89	15.61	40.46	41.04	6	20	0	-5	-5	-4	8.18	24.70	36.00	30.95
Tucson, AZ MSA	14.79	40	15.27	5.00	32.50	25.00	37.50	0	4	0	0	-1	-3	7.32	28.83	32.76	30.66
Limited Review:																	
Eastern AZ Non-Metro	1.29	10	3.82	0.00	20.00	50.00	30.00	0	0	0	0	0	0	6.04	25.62	53.22	15.12
Flagstaff, AZ MSA	1.49	6	2.29	0.00	50.00	16.67	33.33	0	0	0	0	0	0	0.00	32.68	40.74	26.58
Lake Havasu City-Kingman, AZ MSA	2.25	10	3.82	0.00	10.00	90.00	0.00	1	0	0	0	1	0	0.00	11.26	82.97	5.77
Noqales-Douglas, AZ Non-Metro	2.22	7	2.67	0.00	57.14	28.57	14.29	0	0	0	0	0	0	0.70	23.08	45.03	31.19
Prescott, AZ MSA	3.20	9	3.44	0.00	44.44	44.44	11.11	0	3	0	-1	-1	-1	0.00	15.17	67.84	16.98
Western AZ Non-Metro	0.13	1	0.38	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	54.66	45.34	0.00
Yuma, AZ MSA	1.67	6	2.29	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	34.73	35.02	29.98

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: ARKANSAS												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Ashdown, AR Non-Metro	100.00	68	5,610	42	2,167	6	1,039	0	0	116	8,816	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Table 2: Geographic Distribution of Home Purchase Loans															
Geographic Distribution: HOME PURCHASE			Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	23	100.00	0.00	0.00	0.00	0.00	84.29	95.65	15.71	4.35	8.24	0.00	0.00	8.33	7.69

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Table 3: Geographic Distribution of Home Improvement Loans															
Geographic Distribution: HOME IMPROVEMENT				Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	10	100.00	0.00	0.00	0.00	0.00	84.29	70.00	15.71	30.00	4.76	0.00	0.00	0.00	14.29

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Table 4: Geographic Distribution of Home Mortgage Refinance Loans															
Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	35	100.00	0.00	0.00	0.00	0.00	84.29	74.29	15.71	25.71	8.82	0.00	0.00	7.50	13.64

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Table 3: Geographic Distribution of Multifamily Loans															
Geographic Distribution: MULTIFAMILY			Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	0	0.00	0.00	0.00	0.00	0.00	95.02	0.00	4.98	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Ashdown, AR Non-Metro	42	100.0	0.00	0.00	0.00	0.00	86.1	83.3	13.8	16.6	11.2	0.0	0.0	14.2	5.0

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	6	100.00	0.00	0.00	0.00	0.00	88.73	100.00	11.27	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: ARKANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	23	100.00	17.57	0.00	18.51	5.26	19.45	21.05	44.48	73.68	5.41	0.00	6.25	5.56	6.45

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 17.4% of loans originated and purchase by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: HOME IMPROVEMENT															
Geography: ARKANSAS															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Ashdown, AR Non-Metro	10	100.00	17.57	10.00	18.51	20.00	19.45	10.00	44.48	60.00	5.26	0.00	0.00	0.00	10.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Ashdown, AR Non-Metro	35	100.00	17.57	0.00	18.51	19.35	19.45	25.81	44.48	54.84	8.89	0.00	16.67	7.14	7.02

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 11.4% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Ashdown, AR Non-Metro	42	100.00	69.89	61.90	97.62	0.00	2.38	11.20	20.00

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 26.2% 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: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Ashdown, AR Non-Metro	6	100.00	100.00	33.33	16.67	66.67	16.67	0.00	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 66.7% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ARKANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012			
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>									
Ashdown, AR Non-Metro	0	0	0	0	0	0	0.00	0	0
<b>Statewide:</b>									
Arkansas Statewide	0	0	1	500	1	500	100.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: ARKANSAS		Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Ashdown, AR Non-Metro	100.00	1	100.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: CALIFORNIA												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Fresno, CA MSA	1.76	18,934	3,723,616	12,737	620,170	689	57,906	7	44,711	32,367	4,446,404	1.34
Los Angeles-Long Beach-Glendale, CA MD	21.60	169,367	59,027,341	227,510	8,171,511	770	32,179	142	711,296	397,789	67,942,328	21.92
Oakland-Fremont-Hayward, CA MD	9.40	90,721	32,516,286	81,775	2,877,536	392	12,327	80	274,659	172,968	35,680,808	9.63
Riverside-San Bernardino-Ontario, CA MSA	8.21	91,363	20,036,630	59,151	1,966,307	468	13,753	30	139,391	151,012	22,156,081	3.75
San Francisco-San Mateo-Redwood City, CA MD	8.67	62,845	29,578,909	96,230	3,390,253	346	11,454	65	301,544	159,486	33,282,160	19.78
Santa Ana-Anaheim-Irvine, CA MD	10.54	79,752	30,125,563	113,812	4,207,013	378	13,610	49	223,207	193,991	34,569,393	9.13
Limited Review:												
Bakersfield-Delano, CA MSA	1.28	13,502	2,347,639	9,639	400,532	376	37,298	14	75,116	23,531	2,860,586	0.79
Central CA Non-Metro	0.36	4,118	866,178	2,333	84,622	91	3,630	0	0	6,542	954,430	0.20
Chico, CA MSA	0.41	3,804	743,315	3,554	122,037	167	6,571	6	17,551	7,531	889,474	0.31
Eastern CA Non-Metro	0.07	1,096	321,439	174	7,806	4	80	0	0	1,274	329,325	0.00
El Centro, CA MSA	0.22	2,553	394,280	1,434	46,383	82	8,004	0	0	4,069	448,666	0.18
Hanford-Corcoran, CA MSA	0.19	2,169	380,694	1,174	47,732	228	15,858	3	17,855	3,574	462,139	0.12
Madera-Chowchilla, CA MSA	0.26	2,675	456,870	1,768	74,188	253	13,597	3	18,876	4,699	563,531	0.13
Merced, CA MSA	0.35	4,252	625,679	1,939	71,548	197	14,049	7	7,774	6,395	719,049	0.13
Modesto, CA MSA	1.00	12,250	2,088,946	5,789	205,229	333	19,435	7	48,003	18,379	2,361,613	0.66
Napa, CA MSA	0.44	4,000	1,311,802	3,806	145,168	222	12,807	3	800	8,031	1,470,576	0.31
Northern CA Non-Metro	0.68	7,235	1,480,743	4,904	171,192	304	17,255	1	1,362	12,444	1,670,552	0.34
Oxnard-Thousand Oaks-Ventura, CA MSA	2.48	23,126	7,723,043	22,235	717,959	317	10,237	19	102,919	45,697	8,554,158	2.14
Redding, CA MSA	0.33	3,341	631,102	2,644	81,459	36	627	5	21,721	6,026	734,910	0.16
Sacramento--Arden-Arcade--Roseville, CA MSA	6.73	66,165	15,689,841	56,994	1,939,903	539	19,960	31	174,056	123,729	17,823,760	4.80
Salinas, CA MSA	0.85	7,957	2,662,768	7,356	273,721	243	19,003	5	43,810	15,561	2,999,302	1.22
San Diego-Carlsbad-San Marcos, CA MSA	8.77	80,973	27,721,844	79,871	2,826,666	489	15,677	57	119,570	161,390	30,683,757	8.15
San Jose-Sunnyvale-Santa Clara, CA MSA	7.67	78,019	33,227,821	62,697	2,124,151	277	10,135	35	167,112	141,028	35,529,220	9.84
San Luis Obispo-Paso Robles, CA MSA	0.77	9,314	2,780,747	4,513	158,557	267	9,475	4	6,583	14,098	2,955,362	0.38
Santa Barbara-Santa Maria-Goleta, CA MSA	0.94	10,316	3,476,955	6,858	229,892	193	7,347	4	3,660	17,371	3,717,853	0.98
Santa Cruz-Watsonville, CA MSA	0.88	8,250	3,025,846	7,734	276,600	204	11,564	7	79,352	16,195	3,393,362	0.61
Santa Rosa-Petaluma, CA MSA	1.47	14,441	4,367,457	12,331	457,567	350	16,900	11	55,777	27,133	4,897,701	1.36
Stockton, CA MSA	1.44	17,710	3,462,298	8,512	315,366	335	27,833	2	15,154	26,559	3,820,652	0.70
Truckee-Grass Valley, CA Non-Metro	0.39	4,238	1,152,418	2,954	91,804	27	557	0	0	7,219	1,244,779	0.18
Vallejo-Fairfield, CA MSA	0.91	11,124	2,623,848	5,592	185,688	61	4,250	5	25,663	16,782	2,839,448	0.36
Visalia-Porterville, CA MSA	0.63	6,782	1,129,131	4,127	188,044	624	50,002	12	128,675	11,545	1,495,852	0.27
Yuba City, CA MSA	0.31	3,402	584,982	2,159	72,260	175	6,898	1	9,555	5,737	673,695	0.12

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fresno, CA MSA	10,349	3.05	1.60	1.13	21.71	13.99	35.87	35.27	40.82	49.61	27.19	42.53	30.83	25.47	27.24
Los Angeles-Long Beach-Glendale, CA MD	57,092	16.80	1.91	3.29	15.46	17.60	31.30	34.39	51.33	44.72	19.54	18.46	19.65	20.03	19.23
Oakland-Fremont-Hayward, CA MD	26,810	7.89	3.49	3.99	13.07	14.54	43.58	44.91	39.86	36.56	20.12	18.25	19.39	19.68	21.16
Riverside-San Bernardino-Ontario, CA MSA	52,017	15.31	1.49	0.93	21.74	18.77	43.33	46.78	33.44	33.52	21.47	25.33	21.05	21.30	21.85
San Francisco-San Mateo-Redwood City, CA MD	13,492	3.97	1.54	6.35	12.79	14.40	45.12	40.48	40.55	38.76	24.46	29.43	22.33	23.82	25.52
Santa Ana-Anaheim-Irvine, CA MD	22,713	6.69	1.25	1.18	19.56	20.49	33.56	32.03	45.63	46.30	20.63	22.19	18.99	20.18	21.68
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	8,580	2.53	2.10	0.63	23.06	11.03	33.51	31.01	41.33	57.33	20.09	20.00	16.82	19.45	21.13
Central CA Non-Metro	1,435	0.42	0.00	0.00	0.00	0.00	62.07	63.62	37.93	36.38	20.50	0.00	0.00	21.60	18.87
Chico, CA MSA	1,434	0.42	0.38	0.77	14.86	11.65	60.46	59.90	24.30	27.68	19.85	40.00	19.43	20.66	18.48
Eastern CA Non-Metro	502	0.15	0.00	0.00	20.60	4.18	41.94	39.84	37.46	55.98	36.22	0.00	11.63	21.93	45.74
El Centro, CA MSA	1,943	0.57	0.00	0.00	23.53	7.77	42.36	38.29	34.11	53.94	23.83	0.00	18.02	25.03	23.79
Hanford-Corcoran, CA MSA	1,159	0.34	0.00	0.00	22.35	10.96	39.08	30.37	38.57	58.67	21.51	0.00	20.40	24.65	19.83
Madera-Chowchilla, CA MSA	1,487	0.44	0.00	0.00	11.37	7.53	52.17	62.68	36.46	29.79	22.61	0.00	14.66	24.48	21.67
Merced, CA MSA	3,119	0.92	0.00	0.00	17.13	11.54	50.94	42.13	31.94	46.33	22.55	0.00	19.57	21.78	24.04
Modesto, CA MSA	7,966	2.34	1.12	0.56	14.63	12.79	53.88	58.71	30.36	27.93	24.65	22.45	25.59	24.98	23.77
Napa, CA MSA	1,428	0.42	0.00	0.00	13.85	21.43	60.87	64.08	25.28	14.50	27.10	0.00	27.27	27.87	24.19
Northern CA Non-Metro	2,508	0.74	0.00	0.00	20.06	17.62	70.35	73.76	9.59	8.61	23.55	0.00	24.85	23.85	19.55
Oxnard-Thousand Oaks-Ventura, CA MSA	7,525	2.21	1.20	1.34	15.46	21.78	46.06	47.26	37.29	29.62	22.72	23.97	24.38	22.62	21.87
Redding, CA MSA	1,192	0.35	0.00	0.00	12.78	16.36	70.92	60.74	16.30	22.90	18.64	0.00	15.80	19.10	19.64
Sacramento--Arden-Arcade--Roseville, CA MSA	29,397	8.65	3.32	3.13	18.33	14.99	42.14	40.09	36.21	41.79	23.04	25.49	24.48	22.02	23.44
Salinas, CA MSA	3,195	0.94	0.00	0.00	13.83	15.31	45.09	48.70	41.08	35.99	23.08	0.00	21.27	22.79	24.35
San Diego-Carlsbad-San Marcos, CA MSA	30,071	8.85	2.30	4.03	14.03	13.29	41.01	39.74	42.66	42.94	22.31	23.04	21.42	22.40	22.44
San Jose-Sunnyvale-Santa Clara, CA MSA	17,169	5.05	1.13	2.30	16.54	21.90	47.80	47.13	34.53	28.67	23.70	20.27	22.51	23.44	25.45
San Luis Obispo-Paso Robles, CA MSA	2,698	0.79	0.00	0.00	10.27	12.53	75.43	75.91	14.31	11.56	21.60	0.00	21.10	21.84	20.37
Santa Barbara-Santa Maria-Goleta, CA MSA	3,608	1.06	0.97	1.88	17.42	23.92	39.94	51.39	41.68	22.81	26.35	37.04	25.17	27.22	25.32
Santa Cruz-Watsonville, CA MSA	1,876	0.55	0.00	0.00	20.21	27.24	40.44	37.79	39.35	34.97	21.37	0.00	23.23	20.02	21.46
Santa Rosa-Petaluma, CA MSA	4,257	1.25	0.00	0.00	9.17	10.64	71.27	70.78	19.56	18.58	21.85	0.00	19.62	22.14	21.89
Stockton, CA MSA	11,496	3.38	1.80	0.98	19.48	10.63	39.28	33.72	39.43	54.66	26.65	32.32	26.06	27.85	25.96
Truckee-Grass Valley, CA Non-Metro	1,187	0.35	0.00	0.00	3.77	3.79	40.92	27.80	55.31	68.41	20.18	0.00	28.07	23.61	18.54
Vallejo-Fairfield, CA MSA	6,229	1.83	0.52	0.45	15.69	14.54	50.32	50.63	33.48	34.37	23.76	31.58	24.00	23.79	23.60
Visalia-Porterville, CA MSA	3,654	1.08	0.00	0.00	22.02	13.82	38.85	40.42	39.13	45.76	21.38	0.00	20.74	20.72	22.19
Yuba City, CA MSA	2,152	0.63	0.00	0.00	17.49	22.96	52.57	46.28	29.94	30.76	24.92	0.00	33.66	19.47	28.66

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fresno, CA MSA	522	1.70	1.60	1.15	21.71	11.88	35.87	27.97	40.82	59.00	32.28	2.30	52.63	35.92	39.07
Los Angeles-Long Beach-Glendale, CA MD	7,518	24.52	1.91	1.60	15.46	12.05	31.30	27.96	51.33	58.39	25.36	23.58	27.24	24.23	25.59
Oakland-Fremont-Hayward, CA MD	2,756	8.99	3.49	3.19	13.07	9.94	43.58	36.54	39.86	50.33	26.29	19.44	34.51	29.19	23.60
Riverside-San Bernardino-Ontario, CA MSA	2,285	7.45	1.49	1.40	21.74	14.31	43.33	38.38	33.44	45.91	29.15	50.00	30.21	30.04	27.68
San Francisco-San Mateo-Redwood City, CA MD	2,121	6.92	1.54	1.08	12.79	12.16	45.12	46.35	40.55	40.41	26.83	26.32	27.50	30.51	23.56
Santa Ana-Anaheim-Irvine, CA MD	3,100	10.11	1.25	0.71	19.56	13.39	33.56	30.52	45.63	55.39	25.90	16.67	26.68	24.94	26.37
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	335	1.09	2.10	1.19	23.06	15.82	33.51	31.04	41.33	51.94	24.44	33.33	37.50	16.16	28.38
Central CA Non-Metro	137	0.45	0.00	0.00	0.00	0.00	62.07	62.04	37.93	37.96	18.70	0.00	0.00	22.06	14.55
Chico, CA MSA	111	0.36	0.38	0.90	14.86	12.61	60.46	62.16	24.30	24.32	26.00	100.00	45.45	26.67	14.29
Eastern CA Non-Metro	40	0.13	0.00	0.00	20.60	5.00	41.94	35.00	37.46	60.00	13.33	0.00	0.00	0.00	21.05
El Centro, CA MSA	46	0.15	0.00	0.00	23.53	21.74	42.36	34.78	34.11	43.48	48.28	0.00	50.00	77.78	28.57
Hanford-Corcoran, CA MSA	76	0.25	0.00	0.00	22.35	13.16	39.08	38.16	38.57	48.68	17.50	0.00	18.18	20.83	14.71
Madera-Chowchilla, CA MSA	97	0.32	0.00	0.00	11.37	7.22	52.17	48.45	36.46	44.33	25.45	0.00	50.00	16.00	30.77
Merced, CA MSA	69	0.23	0.00	0.00	17.13	5.80	50.94	53.62	31.94	40.58	17.46	0.00	25.00	15.63	17.39
Modesto, CA MSA	269	0.88	1.12	2.23	14.63	12.27	53.88	53.90	30.36	31.60	43.79	0.00	50.00	47.37	37.29
Napa, CA MSA	149	0.49	0.00	0.00	13.85	9.40	60.87	61.74	25.28	28.86	24.19	0.00	37.50	22.22	26.92
Northern CA Non-Metro	306	1.00	0.00	0.00	20.06	15.03	70.35	74.84	9.59	10.13	31.40	0.00	40.00	29.75	25.00
Oxnard-Thousand Oaks-Ventura, CA MSA	787	2.57	1.20	0.64	15.46	10.29	46.06	45.11	37.29	43.96	21.69	16.67	25.81	22.16	20.65
Redding, CA MSA	92	0.30	0.00	0.00	12.78	10.87	70.92	73.91	16.30	15.22	21.88	0.00	0.00	27.14	13.33
Sacramento--Arden-Arcade--Roseville, CA MSA	1,879	6.13	3.32	2.82	18.33	12.24	42.14	37.09	36.21	47.84	24.13	33.33	21.71	24.36	24.33
Salinas, CA MSA	324	1.06	0.00	0.00	13.83	7.41	45.09	40.12	41.08	52.47	36.32	0.00	40.00	34.44	37.65
San Diego-Carlsbad-San Marcos, CA MSA	2,503	8.16	2.30	2.00	14.03	8.43	41.01	33.00	42.66	56.57	24.56	38.64	26.86	23.97	24.11
San Jose-Sunnyvale-Santa Clara, CA MSA	2,383	7.77	1.13	0.59	16.54	10.37	47.80	47.59	34.53	41.46	29.06	23.08	28.86	31.08	26.75
San Luis Obispo-Paso Robles, CA MSA	361	1.18	0.00	0.00	10.27	10.53	75.43	73.68	14.31	15.79	26.51	0.00	30.43	26.88	22.50
Santa Barbara-Santa Maria-Goleta, CA MSA	385	1.26	0.97	1.04	17.42	13.77	39.94	36.88	41.68	48.31	15.29	0.00	21.15	21.30	11.48
Santa Cruz-Watsonville, CA MSA	375	1.22	0.00	0.00	20.21	13.33	40.44	42.93	39.35	43.73	35.32	0.00	50.00	47.06	28.13
Santa Rosa-Petaluma, CA MSA	497	1.62	0.00	0.00	9.17	5.84	71.27	68.81	19.56	25.35	26.22	0.00	36.36	26.36	23.97
Stockton, CA MSA	359	1.17	1.80	3.06	19.48	16.43	39.28	32.31	39.43	48.19	40.50	28.57	55.88	39.77	37.17
Truckee-Grass Valley, CA Non-Metro	170	0.55	0.00	0.00	3.77	2.35	40.92	34.71	55.31	62.94	27.62	0.00	50.00	33.33	24.29
Vallejo-Fairfield, CA MSA	263	0.86	0.52	0.38	15.69	16.35	50.32	52.47	33.48	30.80	26.29	0.00	37.50	26.60	20.90
Visalia-Porterville, CA MSA	260	0.85	0.00	0.00	22.02	16.15	38.85	39.62	39.13	44.23	35.98	0.00	64.29	31.75	34.48
Yuba City, CA MSA	83	0.27	0.00	0.00	17.49	9.64	52.57	56.63	29.94	33.73	18.18	0.00	0.00	17.78	24.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fresno, CA MSA	34	4.52	6.51	8.82	38.38	26.47	39.03	41.18	16.08	23.53	32.00	0.00	11.11	50.00	50.00
Los Angeles-Long Beach-Glendale, CA MD	288	38.25	12.96	14.58	31.74	39.58	28.34	28.82	26.96	17.01	2.75	4.34	2.71	2.63	2.10
Oakland-Fremont-Hayward, CA MD	45	5.98	13.31	15.56	27.95	40.00	45.36	31.11	13.38	13.33	1.76	2.99	1.54	1.31	2.50
Riverside-San Bernardino-Ontario, CA MSA	33	4.38	7.73	9.09	38.68	24.24	37.84	54.55	15.76	12.12	4.39	0.00	2.00	6.82	10.00
San Francisco-San Mateo-Redwood City, CA MD	62	8.23	19.98	12.90	23.42	37.10	31.54	33.87	25.05	16.13	1.51	2.08	1.50	0.92	1.99
Santa Ana-Anaheim-Irvine, CA MD	51	6.77	6.27	13.73	41.07	37.25	33.61	29.41	19.05	19.61	4.07	2.94	3.03	4.76	10.71
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	9	1.20	5.58	0.00	33.58	44.44	31.60	33.33	29.24	22.22	28.57	0.00	37.50	33.33	0.00
Central CA Non-Metro	2	0.27	0.00	0.00	0.00	0.00	68.34	100.00	31.66	0.00	33.33	0.00	0.00	50.00	0.00
Chico, CA MSA	4	0.53	8.41	25.00	34.73	25.00	34.21	50.00	22.65	0.00	5.56	0.00	14.29	0.00	0.00
Eastern CA Non-Metro	1	0.13	0.00	0.00	11.45	0.00	2.26	0.00	86.30	100.00	33.33	0.00	0.00	0.00	50.00
El Centro, CA MSA	0	0.00	0.00	0.00	38.97	0.00	27.45	0.00	33.58	0.00	0.00	0.00	0.00	0.00	0.00
Hanford-Corcoran, CA MSA	1	0.13	0.00	0.00	30.00	0.00	38.19	100.00	31.80	0.00	50.00	0.00	0.00	100.00	0.00
Madera-Chowchilla, CA MSA	2	0.27	0.00	0.00	47.62	50.00	39.87	50.00	12.50	0.00	0.00	0.00	0.00	0.00	0.00
Merced, CA MSA	5	0.66	0.00	0.00	39.39	60.00	42.53	20.00	18.09	20.00	25.00	0.00	50.00	0.00	0.00
Modesto, CA MSA	8	1.06	3.38	12.50	26.24	25.00	49.18	37.50	21.20	25.00	14.29	0.00	0.00	25.00	0.00
Napa, CA MSA	1	0.13	0.00	0.00	24.02	0.00	72.18	100.00	3.80	0.00	0.00	0.00	0.00	0.00	0.00
Northern CA Non-Metro	8	1.06	0.00	0.00	41.81	62.50	56.86	37.50	1.34	0.00	0.00	0.00	0.00	0.00	0.00
Oxnard-Thousand Oaks-Ventura, CA MSA	10	1.33	3.57	0.00	34.60	70.00	47.43	30.00	14.41	0.00	11.11	0.00	17.39	0.00	0.00
Redding, CA MSA	3	0.40	0.00	0.00	44.43	33.33	47.48	66.67	8.09	0.00	28.57	0.00	100.00	16.67	0.00
Sacramento--Arden-Arcade--Roseville, CA MSA	19	2.52	10.57	5.26	36.09	26.32	35.54	47.37	17.80	21.05	1.69	0.00	1.67	2.94	1.67
Salinas, CA MSA	13	1.73	0.00	0.00	28.29	15.38	58.50	69.23	13.21	15.38	16.67	0.00	0.00	26.67	0.00
San Diego-Carlsbad-San Marcos, CA MSA	88	11.69	11.77	23.86	32.61	28.41	37.33	42.05	18.29	5.68	5.16	6.02	4.49	6.62	0.00
San Jose-Sunnyvale-Santa Clara, CA MSA	27	3.59	6.94	7.41	26.10	51.85	53.65	29.63	13.30	11.11	4.05	2.94	5.33	2.22	8.70
San Luis Obispo-Paso Robles, CA MSA	4	0.53	0.00	0.00	34.31	50.00	64.12	50.00	1.56	0.00	0.00	0.00	0.00	0.00	0.00
Santa Barbara-Santa Maria-Goleta, CA MSA	3	0.40	12.99	0.00	41.94	0.00	28.08	100.00	16.99	0.00	0.00	0.00	0.00	0.00	0.00
Santa Cruz-Watsonville, CA MSA	8	1.06	0.00	0.00	43.78	12.50	44.77	62.50	11.45	25.00	16.67	0.00	11.11	12.50	100.00
Santa Rosa-Petaluma, CA MSA	4	0.53	0.00	0.00	29.86	75.00	65.54	25.00	4.60	0.00	1.82	0.00	6.25	0.00	0.00
Stockton, CA MSA	5	0.66	22.11	60.00	26.33	20.00	37.30	20.00	14.27	0.00	12.50	0.00	50.00	0.00	0.00
Truckee-Grass Valley, CA Non-Metro	2	0.27	0.00	0.00	33.06	100.00	45.31	0.00	21.63	0.00	0.00	0.00	0.00	0.00	0.00
Vallejo-Fairfield, CA MSA	5	0.66	6.21	0.00	35.41	60.00	37.98	20.00	20.40	20.00	0.00	0.00	0.00	0.00	0.00
Visalia-Porterville, CA MSA	6	0.80	0.00	0.00	40.02	33.33	30.92	16.67	29.06	50.00	8.33	0.00	0.00	0.00	25.00
Yuba City, CA MSA	2	0.27	0.00	0.00	49.32	0.00	37.49	100.00	13.19	0.00	11.11	0.00	0.00	25.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Fresno, CA MSA	12,737	1.40	5.43	6.00	23.64	21.14	32.26	29.15	38.56	43.72	25.44	34.24	31.38	22.34	24.78
Los Angeles-Long Beach-Glendale, CA MD	225,810	24.76	6.47	4.69	18.72	15.68	26.40	24.88	47.64	54.75	23.77	19.32	22.73	22.93	25.20
Oakland-Fremont-Hayward, CA MD	81,763	8.97	8.80	7.09	15.45	12.91	38.68	35.34	36.96	44.66	33.39	34.92	32.15	31.32	35.86
Riverside-San Bernardino-Ontario, CA MSA	59,146	6.49	2.64	1.94	23.99	20.32	41.13	37.61	32.18	40.13	24.92	29.64	24.57	24.37	26.71
San Francisco-San Mateo-Redwood City, CA MD	96,230	10.55	13.61	11.38	17.37	17.10	34.98	35.48	33.97	36.05	35.80	35.51	33.19	33.93	40.08
Santa Ana-Anaheim-Irvine, CA MD	113,167	12.41	2.38	2.38	25.49	22.53	33.63	30.98	37.70	44.11	29.80	33.39	28.61	28.66	31.60
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	9,639	1.06	2.24	2.73	24.49	24.68	28.59	22.19	44.67	50.40	25.68	31.98	35.07	22.56	23.52
Central CA Non-Metro	2,333	0.26	0.00	0.00	0.00	0.00	62.50	67.04	37.49	32.96	30.94	0.00	0.00	33.02	34.05
Chico, CA MSA	3,554	0.39	0.40	0.25	24.05	18.43	48.49	46.93	27.05	34.38	20.60	25.00	22.33	21.31	19.53
Eastern CA Non-Metro	174	0.02	0.00	0.00	31.46	28.16	27.80	45.40	40.74	26.44	13.21	0.00	11.88	29.01	5.39
El Centro, CA MSA	1,434	0.16	0.00	0.00	30.30	35.15	38.43	38.15	31.27	26.71	27.76	0.00	32.64	31.97	19.40
Hanford-Corcoran, CA MSA	1,174	0.13	0.00	0.00	35.40	29.56	31.28	36.63	33.20	33.82	26.89	0.00	37.19	20.74	27.21
Madera-Chowchilla, CA MSA	1,768	0.19	0.00	0.00	12.98	11.37	54.52	53.68	32.49	34.95	24.64	0.00	26.11	25.17	25.21
Merced, CA MSA	1,939	0.21	0.00	0.00	25.08	27.08	47.61	33.94	27.31	38.99	21.45	0.00	28.87	16.21	26.08
Modesto, CA MSA	5,789	0.63	6.49	4.59	14.64	12.89	51.23	47.62	27.64	34.89	22.06	25.53	18.59	22.36	24.04
Napa, CA MSA	3,806	0.42	0.00	0.00	23.35	19.76	56.42	59.75	20.24	20.49	27.94	0.00	28.27	30.14	24.97
Northern CA Non-Metro	4,904	0.54	0.00	0.00	23.97	20.02	68.16	69.45	7.87	10.52	25.75	0.00	22.49	27.50	37.93
Oxnard-Thousand Oaks-Ventura, CA MSA	22,235	2.44	2.90	2.39	16.34	13.46	48.21	45.28	32.55	38.87	29.68	32.99	31.49	29.63	29.39
Redding, CA MSA	2,644	0.29	0.00	0.00	22.94	18.49	63.60	65.43	13.47	16.07	21.66	0.00	23.00	22.42	20.83
Sacramento--Arden-Arcade--Roseville, CA MSA	56,994	6.25	5.91	4.86	19.05	16.36	38.18	33.53	36.86	45.26	33.24	29.72	33.12	32.51	35.40
Salinas, CA MSA	7,356	0.81	0.00	0.00	19.30	14.21	44.15	40.21	36.55	45.58	35.40	0.00	35.43	32.79	40.07
San Diego-Carlsbad-San Marcos, CA MSA	79,871	8.76	4.29	3.20	18.44	14.89	36.62	33.71	40.60	48.20	27.31	27.41	25.74	26.81	28.79
San Jose-Sunnyvale-Santa Clara, CA MSA	62,697	6.88	2.64	2.37	21.04	17.45	43.73	44.95	32.60	35.24	33.07	33.95	31.13	33.27	34.36
San Luis Obispo-Paso Robles, CA MSA	4,513	0.49	0.00	0.00	18.67	15.69	67.54	64.35	13.80	19.96	20.76	0.00	20.67	20.69	23.70
Santa Barbara-Santa Maria-Goleta, CA MSA	6,858	0.75	2.22	1.56	32.24	30.07	32.93	29.16	32.61	39.21	24.86	23.28	27.66	22.39	25.84
Santa Cruz-Watsonville, CA MSA	7,734	0.85	0.00	0.00	20.73	20.03	45.71	44.35	33.56	35.62	32.82	0.00	34.70	32.39	33.56
Santa Rosa-Petaluma, CA MSA	12,331	1.35	0.00	0.00	13.94	10.25	69.95	70.42	16.10	19.33	29.98	0.00	29.29	30.75	31.22
Stockton, CA MSA	8,512	0.93	6.95	5.36	19.14	16.60	34.91	32.47	39.00	45.57	24.71	32.18	22.16	24.04	26.28
Truckee-Grass Valley, CA Non-Metro	2,954	0.32	0.00	0.00	7.39	6.64	43.50	40.28	49.11	53.08	32.80	0.00	32.22	37.42	31.72
Vallejo-Fairfield, CA MSA	5,592	0.61	2.16	1.52	21.22	17.06	46.30	43.60	30.29	37.82	24.94	24.59	25.92	25.32	25.36
Visalia-Porterville, CA MSA	4,127	0.45	0.00	0.00	25.81	24.64	35.56	37.95	38.60	37.41	22.35	0.00	28.86	20.87	20.85
Yuba City, CA MSA	2,159	0.24	0.00	0.00	26.73	21.77	46.64	44.00	26.63	34.23	26.29	0.00	26.56	27.52	26.64

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms															
Geography: CALIFORNIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Fresno, CA MSA	689	7.30	1.29	1.45	24.51	23.51	44.11	49.35	30.06	25.69	40.60	100.00	45.31	39.41	40.00
Los Angeles-Long Beach-Glendale, CA MD	768	8.14	3.09	2.08	15.57	14.71	30.85	24.48	49.93	58.72	69.01	20.00	66.67	68.00	71.08
Oakland-Fremont-Hayward, CA MD	392	4.16	5.70	1.53	16.05	9.95	38.08	28.83	40.17	59.69	65.43	100.00	50.00	74.36	64.22
Riverside-San Bernardino-Ontario, CA MSA	468	4.96	1.81	0.64	24.07	20.94	41.84	37.61	32.26	40.81	51.26	33.33	48.44	57.47	50.00
San Francisco-San Mateo-Redwood City, CA MD	346	3.67	6.21	6.65	14.85	15.32	42.91	34.68	36.03	43.35	70.86	66.67	92.86	72.41	70.77
Santa Ana-Anaheim-Irvine, CA MD	378	4.01	2.48	2.65	26.03	19.31	32.87	30.42	38.36	47.62	70.16	66.67	94.44	62.50	70.49
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	376	3.99	1.42	0.00	31.37	34.31	33.82	25.80	33.38	39.89	48.35	0.00	55.21	38.03	50.68
Central CA Non-Metro	91	0.96	0.00	0.00	0.00	0.00	60.64	52.75	39.36	47.25	65.38	0.00	0.00	69.57	64.29
Chico, CA MSA	167	1.77	0.09	1.80	9.61	2.40	51.69	44.91	38.61	50.90	36.49	100.00	25.00	38.67	34.33
Eastern CA Non-Metro	4	0.04	0.00	0.00	24.47	0.00	38.30	0.00	37.23	100.00	25.00	0.00	100.00	0.00	25.00
El Centro, CA MSA	82	0.87	0.00	0.00	17.36	18.29	45.04	41.46	37.60	40.24	27.96	0.00	80.00	29.73	22.00
Hanford-Corcoran, CA MSA	226	2.40	0.00	0.00	21.85	5.31	59.57	76.11	18.45	18.58	37.23	0.00	33.33	36.08	45.45
Madera-Chowchilla, CA MSA	253	2.68	0.00	0.00	2.75	5.53	80.77	71.94	16.48	22.53	42.07	0.00	100.00	35.29	72.00
Merced, CA MSA	197	2.09	0.00	0.00	12.71	7.61	73.28	65.48	14.01	26.90	19.43	0.00	35.00	16.74	30.30
Modesto, CA MSA	333	3.53	1.83	3.30	12.09	9.01	62.56	59.76	23.52	27.93	27.60	33.33	33.33	23.01	38.46
Napa, CA MSA	222	2.35	0.00	0.00	13.62	8.56	46.22	54.50	40.16	36.94	60.17	0.00	83.33	63.49	55.32
Northern CA Non-Metro	304	3.22	0.00	0.00	20.89	11.84	73.13	84.54	5.98	3.62	48.33	0.00	36.36	51.05	66.67
Oxnard-Thousand Oaks-Ventura, CA MSA	317	3.36	4.08	1.26	20.68	11.36	54.25	55.84	20.99	31.55	56.60	50.00	76.00	46.94	72.73
Redding, CA MSA	36	0.38	0.00	0.00	13.30	11.11	73.23	72.22	13.47	16.67	30.30	0.00	100.00	26.67	100.00
Sacramento--Arden-Arcade--Roseville, CA MSA	539	5.71	3.38	0.74	16.74	12.24	46.63	44.34	33.25	42.67	41.28	25.00	33.33	38.73	50.40
Salinas, CA MSA	243	2.58	0.00	0.00	17.87	8.64	49.40	55.56	32.72	35.80	61.82	0.00	41.67	64.52	74.42
San Diego-Carlsbad-San Marcos, CA MSA	489	5.18	3.47	1.23	16.73	9.20	40.79	43.56	38.99	46.01	54.55	100.00	59.38	57.14	52.83
San Jose-Sunnyvale-Santa Clara, CA MSA	277	2.94	2.17	0.00	28.89	17.33	43.08	48.01	25.87	34.66	60.00	0.00	37.50	64.41	73.53
San Luis Obispo-Paso Robles, CA MSA	267	2.83	0.00	0.00	12.97	8.24	72.75	74.53	14.28	17.23	46.99	0.00	55.56	48.44	44.00
Santa Barbara-Santa Maria-Goleta, CA MSA	193	2.05	1.72	11.40	22.43	24.35	33.31	38.34	42.55	25.91	36.88	66.67	52.63	28.85	26.83
Santa Cruz-Watsonville, CA MSA	204	2.16	0.00	0.00	21.99	35.29	39.46	33.82	38.55	30.88	73.49	0.00	77.78	68.97	76.92
Santa Rosa-Petaluma, CA MSA	350	3.71	0.00	0.00	5.95	4.57	80.70	86.29	13.35	9.14	52.63	0.00	71.43	54.38	38.10
Stockton, CA MSA	335	3.55	1.37	0.60	10.20	2.99	52.06	50.75	36.38	45.67	22.54	0.00	16.67	22.41	24.29
Truckee-Grass Valley, CA Non-Metro	27	0.29	0.00	0.00	3.25	11.11	52.38	40.74	44.37	48.15	43.48	0.00	100.00	25.00	50.00
Vallejo-Fairfield, CA MSA	61	0.65	0.73	0.00	11.23	0.00	57.26	68.85	30.77	31.15	28.07	0.00	0.00	30.00	25.00
Visalia-Porterville, CA MSA	624	6.62	0.00	0.00	23.48	29.17	42.08	32.53	34.44	38.30	40.73	0.00	42.61	35.63	46.21
Yuba City, CA MSA	175	1.86	0.00	0.00	6.70	2.29	63.15	66.29	30.15	31.43	30.54	0.00	33.33	36.17	22.86

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fresno, CA MSA	10,349	3.04	22.80	7.33	17.05	19.50	18.53	25.30	41.63	47.88	27.29	31.31	25.87	24.88	28.69
Los Angeles-Long Beach-Glendale, CA MD	57,228	16.84	23.87	2.70	16.49	12.76	17.40	24.64	42.24	59.90	20.56	18.19	18.94	20.05	21.45
Oakland-Fremont-Hayward, CA MD	26,810	7.89	20.97	8.89	17.47	20.16	21.18	24.36	40.38	46.60	20.93	20.18	19.14	20.62	22.19
Riverside-San Bernardino-Ontario, CA MSA	52,017	15.30	21.73	8.42	17.48	21.01	20.23	27.58	40.56	42.99	21.77	21.35	20.56	20.95	23.10
San Francisco-San Mateo-Redwood City, CA MD	13,492	3.97	21.33	2.39	17.59	11.55	19.98	19.36	41.11	66.70	26.11	23.38	23.15	25.18	27.26
Santa Ana-Anaheim-Irvine, CA MD	22,714	6.68	20.69	3.27	17.97	15.64	20.68	26.64	40.65	54.45	21.87	15.94	18.64	21.00	23.91
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	8,580	2.52	23.46	7.66	16.67	18.99	18.13	25.70	41.75	47.65	19.85	18.89	17.11	17.48	23.22
Central CA Non-Metro	1,435	0.42	16.29	3.72	16.16	15.37	21.63	19.73	45.92	61.19	20.85	24.14	22.43	17.98	21.22
Chico, CA MSA	1,434	0.42	21.91	6.10	17.06	18.31	21.06	25.63	39.97	49.96	20.13	17.67	19.64	20.33	20.78
Eastern CA Non-Metro	502	0.15	17.61	0.20	17.07	3.86	19.08	10.16	46.24	85.77	37.91	0.00	30.00	26.47	41.16
El Centro, CA MSA	1,943	0.57	23.24	4.10	17.60	16.19	17.11	27.96	42.05	51.76	22.87	19.44	19.40	18.58	27.12
Hanford-Corcoran, CA MSA	1,160	0.34	20.55	6.00	18.31	15.77	19.92	30.02	41.22	48.21	20.72	25.20	16.00	19.41	23.73
Madera-Chowchilla, CA MSA	1,487	0.44	22.09	7.33	16.65	23.57	21.11	26.95	40.14	42.16	22.69	19.00	21.71	22.29	24.81
Merced, CA MSA	3,119	0.92	20.72	10.66	18.32	24.85	19.88	25.28	41.08	39.20	22.56	26.21	25.00	21.54	20.45
Modesto, CA MSA	7,966	2.34	21.74	11.72	17.27	26.90	20.71	25.77	40.28	35.60	24.91	26.08	25.48	23.36	25.10
Napa, CA MSA	1,428	0.42	18.55	5.94	19.66	18.75	22.34	25.98	39.45	49.32	28.87	36.00	28.48	26.98	29.10
Northern CA Non-Metro	2,508	0.74	23.75	5.42	18.98	21.36	21.69	26.25	35.57	46.96	24.29	25.70	26.40	21.36	24.96
Oxnard-Thousand Oaks-Ventura, CA MSA	7,525	2.21	19.55	5.09	18.43	21.63	22.09	28.98	39.92	44.30	24.00	25.18	23.58	23.56	24.33
Redding, CA MSA	1,192	0.35	20.36	5.87	18.02	18.38	21.24	25.63	40.38	50.13	19.17	17.54	17.11	19.70	20.36
Sacramento--Arden-Arcade--Roseville, CA MSA	29,397	8.65	20.59	10.49	18.32	23.54	21.00	25.41	40.09	40.56	23.60	23.71	21.93	23.83	24.59
Salinas, CA MSA	3,195	0.94	19.70	5.31	18.38	18.86	21.52	25.32	40.40	50.51	24.09	23.89	21.34	22.35	26.86
San Diego-Carlsbad-San Marcos, CA MSA	30,071	8.85	21.02	3.10	17.91	15.61	20.09	26.14	40.98	55.15	23.59	21.45	22.00	22.75	24.65
San Jose-Sunnyvale-Santa Clara, CA MSA	17,169	5.05	20.54	4.50	18.11	16.41	21.70	25.02	39.66	54.06	25.43	22.41	23.32	23.35	27.60
San Luis Obispo-Paso Robles, CA MSA	2,698	0.79	18.57	3.18	18.88	13.12	22.65	24.55	39.90	59.15	22.95	25.00	20.32	21.17	24.51
Santa Barbara-Santa Maria-Goleta, CA MSA	3,608	1.06	20.00	5.95	18.61	20.43	20.45	25.30	40.95	48.31	27.45	29.87	27.19	24.10	28.75
Santa Cruz-Watsonville, CA MSA	1,876	0.55	19.96	3.46	17.98	17.46	21.23	20.81	40.83	58.27	23.23	21.21	23.76	19.39	25.06
Santa Rosa-Petaluma, CA MSA	4,257	1.25	17.73	5.70	18.87	20.64	24.32	25.76	39.08	47.90	23.20	20.49	21.72	21.92	25.32
Stockton, CA MSA	11,496	3.38	22.77	10.33	16.48	25.04	19.80	24.81	40.95	39.81	26.60	25.79	27.53	25.93	26.67
Truckee-Grass Valley, CA Non-Metro	1,187	0.35	12.72	1.81	15.27	8.20	20.04	14.93	51.97	75.06	21.40	25.00	18.72	18.56	22.63
Vallejo-Fairfield, CA MSA	6,229	1.83	19.26	10.36	18.51	28.07	23.45	28.49	38.79	33.07	24.08	24.38	23.97	22.75	25.16
Visalia-Porterville, CA MSA	3,654	1.08	22.23	6.62	17.27	17.64	19.30	26.76	41.20	48.98	20.85	22.71	16.96	19.41	23.62
Yuba City, CA MSA	2,152	0.63	20.84	8.85	18.18	23.11	20.53	28.61	40.46	39.43	24.88	25.42	24.93	22.13	27.13

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fresno, CA MSA	522	1.70	22.80	4.12	17.05	9.69	18.53	20.41	41.63	65.77	33.10	12.90	20.69	37.80	36.95
Los Angeles-Long Beach-Glendale, CA MD	7,521	24.53	23.87	2.73	16.49	9.52	17.40	20.29	42.24	67.46	27.08	22.04	27.49	26.90	27.42
Oakland-Fremont-Hayward, CA MD	2,756	8.99	20.97	5.52	17.47	15.12	21.18	24.09	40.38	55.27	28.05	19.91	27.40	27.27	30.29
Riverside-San Bernardino-Ontario, CA MSA	2,285	7.45	21.73	6.25	17.48	14.14	20.23	23.11	40.56	56.51	30.16	37.82	31.87	30.25	28.87
San Francisco-San Mateo-Redwood City, CA MD	2,121	6.92	21.33	5.01	17.59	17.80	19.98	25.97	41.11	51.22	27.71	14.53	27.05	31.51	28.91
Santa Ana-Anaheim-Irvine, CA MD	3,100	10.11	20.69	4.87	17.97	14.34	20.68	27.03	40.65	53.77	27.34	18.13	24.04	29.17	28.68
<b>Limited Review:</b>															
Bakersfield-Delano, CA MSA	335	1.09	23.46	3.02	16.67	10.40	18.13	24.16	41.75	62.42	24.30	0.00	20.00	27.27	26.53
Central CA Non-Metro	137	0.45	16.29	6.77	16.16	12.78	21.63	21.05	45.92	59.40	18.58	20.00	9.09	15.00	23.21
Chico, CA MSA	111	0.36	21.91	4.59	17.06	19.27	21.06	32.11	39.97	44.04	27.08	0.00	28.57	28.00	31.71
Eastern CA Non-Metro	40	0.13	17.61	0.00	17.07	2.50	19.08	12.50	46.24	85.00	16.00	0.00	0.00	0.00	21.05
El Centro, CA MSA	46	0.15	23.24	7.14	17.60	9.52	17.11	26.19	42.05	57.14	46.15	100.00	66.67	75.00	29.41
Hanford-Corcoran, CA MSA	76	0.25	20.55	1.39	18.31	16.67	19.92	26.39	41.22	55.56	16.67	0.00	15.38	20.00	16.67
Madera-Chowchilla, CA MSA	97	0.32	22.09	3.57	16.65	13.10	21.11	25.00	40.14	58.33	23.08	25.00	66.67	13.33	23.33
Merced, CA MSA	69	0.23	20.72	0.00	18.32	7.14	19.88	23.21	41.08	69.64	17.54	0.00	0.00	20.00	24.14
Modesto, CA MSA	269	0.88	21.74	9.68	17.27	14.75	20.71	20.74	40.28	54.84	46.10	41.18	44.00	40.74	50.00
Napa, CA MSA	149	0.49	18.55	4.86	19.66	12.50	22.34	25.69	39.45	56.94	24.79	0.00	16.13	20.59	39.13
Northern CA Non-Metro	306	1.00	23.75	4.65	18.98	14.62	21.69	24.92	35.57	55.81	33.33	28.57	30.30	33.33	35.94
Oxnard-Thousand Oaks-Ventura, CA MSA	787	2.57	19.55	6.49	18.43	16.75	22.09	25.71	39.92	51.04	22.82	31.03	23.53	24.10	20.71
Redding, CA MSA	92	0.30	20.36	6.59	18.02	15.38	21.24	28.57	40.38	49.45	21.74	50.00	21.43	24.00	19.61
Sacramento--Arden-Arcade--Roseville, CA MSA	1,879	6.13	20.59	5.87	18.32	16.76	21.00	25.66	40.09	51.71	24.65	21.30	23.61	25.20	25.56
Salinas, CA MSA	324	1.06	19.70	5.00	18.38	13.33	21.52	16.33	40.40	65.33	36.56	28.57	34.62	35.71	38.14
San Diego-Carlsbad-San Marcos, CA MSA	2,503	8.16	21.02	4.76	17.91	12.14	20.09	22.93	40.98	60.17	25.46	22.83	20.85	26.24	26.45
San Jose-Sunnyvale-Santa Clara, CA MSA	2,383	7.77	20.54	5.37	18.11	14.64	21.70	27.01	39.66	52.98	30.51	25.00	30.26	32.44	30.63
San Luis Obispo-Paso Robles, CA MSA	361	1.18	18.57	4.29	18.88	17.14	22.65	26.57	39.90	52.00	28.33	36.36	28.57	31.03	26.23
Santa Barbara-Santa Maria-Goleta, CA MSA	385	1.26	20.00	3.40	18.61	11.61	20.45	23.51	40.95	61.47	15.71	22.22	22.64	17.65	13.86
Santa Cruz-Watsonville, CA MSA	375	1.22	19.96	4.59	17.98	17.30	21.23	25.41	40.83	52.70	36.98	15.63	19.44	35.00	53.57
Santa Rosa-Petaluma, CA MSA	497	1.62	17.73	7.64	18.87	17.98	24.32	27.48	39.08	46.90	27.98	44.44	25.25	25.21	28.70
Stockton, CA MSA	359	1.17	22.77	8.47	16.48	14.24	19.80	23.39	40.95	53.90	41.05	47.83	32.08	43.10	43.16
Truckee-Grass Valley, CA Non-Metro	170	0.55	12.72	0.62	15.27	10.49	20.04	19.75	51.97	69.14	28.72	0.00	38.46	28.57	27.12
Vallejo-Fairfield, CA MSA	263	0.86	19.26	9.50	18.51	22.50	23.45	18.50	38.79	49.50	26.78	10.00	30.95	27.45	28.57
Visalia-Porterville, CA MSA	260	0.85	22.23	6.48	17.27	15.38	19.30	25.10	41.20	53.04	37.01	57.14	45.83	44.83	28.74
Yuba City, CA MSA	83	0.27	20.84	3.70	18.18	14.81	20.53	14.81	40.46	66.67	19.18	22.22	23.08	11.11	25.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CALIFORNIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Fresno, CA MSA	8,029	1.47	22.80	2.71	17.05	8.45	18.53	16.72	41.63	72.12	28.65	21.97	25.79	26.87	30.02
Los Angeles-Long Beach-Glendale, CA MD	104,330	19.16	23.87	1.66	16.49	6.57	17.40	15.59	42.24	76.19	18.24	9.86	14.45	16.61	19.52
Oakland-Fremont-Hayward, CA MD	61,110	11.22	20.97	3.17	17.47	10.05	21.18	21.43	40.38	65.34	19.99	15.70	18.06	19.76	20.78
Riverside-San Bernardino-Ontario, CA MSA	37,028	6.80	21.73	3.80	17.48	11.18	20.23	21.38	40.56	63.64	20.51	17.26	20.64	19.90	20.95
San Francisco-San Mateo-Redwood City, CA MD	47,170	8.66	21.33	2.40	17.59	9.61	19.98	19.74	41.11	68.25	22.89	13.57	18.74	21.15	24.99
Santa Ana-Anaheim-Irvine, CA MD	53,887	9.90	20.69	3.09	17.97	10.87	20.68	22.91	40.65	63.14	18.14	12.53	15.43	16.25	19.84
Limited Review:															
Bakersfield-Delano, CA MSA	4,578	0.84	23.46	2.49	16.67	7.29	18.13	16.26	41.75	73.96	23.62	21.08	16.83	21.85	25.14
Central CA Non-Metro	2,544	0.47	16.29	2.28	16.16	9.16	21.63	18.23	45.92	70.33	23.84	23.85	22.18	22.60	24.42
Chico, CA MSA	2,255	0.41	21.91	3.71	17.06	12.45	21.06	22.06	39.97	61.79	17.56	17.22	16.57	20.09	16.78
Eastern CA Non-Metro	553	0.10	17.61	0.77	17.07	3.67	19.08	8.88	46.24	86.68	21.03	8.33	15.15	22.97	21.35
El Centro, CA MSA	564	0.10	23.24	1.65	17.60	9.91	17.11	20.28	42.05	68.16	24.54	12.00	20.59	30.43	24.32
Hanford-Corcoran, CA MSA	932	0.17	20.55	4.49	18.31	12.32	19.92	18.41	41.22	64.78	23.44	27.59	30.30	21.74	22.43
Madera-Chowchilla, CA MSA	1,089	0.20	22.09	2.91	16.65	11.42	21.11	21.01	40.14	64.66	26.51	13.79	25.00	26.99	27.87
Merced, CA MSA	1,059	0.19	20.72	4.02	18.32	11.79	19.88	20.80	41.08	63.38	21.81	11.94	22.63	30.00	20.35
Modesto, CA MSA	4,007	0.74	21.74	5.43	17.27	14.60	20.71	23.08	40.28	56.89	24.78	23.49	25.50	25.35	24.56
Napa, CA MSA	2,422	0.44	18.55	4.36	19.66	14.16	22.34	21.91	39.45	59.57	25.43	23.60	27.22	23.88	25.82
Northern CA Non-Metro	4,413	0.81	23.75	3.52	18.98	12.47	21.69	23.12	35.57	60.90	23.80	18.10	22.40	23.18	25.03
Oxnard-Thousand Oaks-Ventura, CA MSA	14,804	2.72	19.55	4.51	18.43	12.50	22.09	24.68	39.92	58.32	19.91	17.07	17.69	18.77	21.31
Redding, CA MSA	2,054	0.38	20.36	4.69	18.02	13.01	21.24	23.87	40.38	58.43	21.87	16.33	21.02	20.32	23.40
Sacramento--Arden-Arcade--Roseville, CA MSA	34,870	6.40	20.59	4.33	18.32	13.00	21.00	23.13	40.09	59.53	22.81	20.54	22.96	22.45	23.18
Salinas, CA MSA	4,425	0.81	19.70	2.16	18.38	7.64	21.52	16.04	40.40	74.16	26.06	18.41	22.97	23.80	27.54
San Diego-Carlsbad-San Marcos, CA MSA	48,311	8.87	21.02	2.50	17.91	8.90	20.09	19.15	40.98	69.44	19.18	13.15	17.30	17.80	20.28
San Jose-Sunnyvale-Santa Clara, CA MSA	58,440	10.73	20.54	2.65	18.11	9.33	21.70	22.47	39.66	65.56	20.54	16.05	19.81	19.10	21.46
San Luis Obispo-Paso Robles, CA MSA	6,251	1.15	18.57	3.52	18.88	11.24	22.65	24.72	39.90	60.52	23.12	17.63	22.36	23.39	23.69
Santa Barbara-Santa Maria-Goleta, CA MSA	6,320	1.16	20.00	2.95	18.61	9.29	20.45	18.99	40.95	68.77	24.09	17.90	24.59	23.30	24.67
Santa Cruz-Watsonville, CA MSA	5,991	1.10	19.96	3.59	17.98	11.19	21.23	21.35	40.83	63.87	24.25	17.91	22.08	23.63	25.56
Santa Rosa-Petaluma, CA MSA	9,683	1.78	17.73	4.34	18.87	13.89	24.32	24.45	39.08	57.32	24.33	17.68	21.52	24.28	26.11
Stockton, CA MSA	5,850	1.07	22.77	4.85	16.48	13.53	19.80	23.36	40.95	58.26	25.15	19.22	24.51	27.23	25.26
Truckee-Grass Valley, CA Non-Metro	2,879	0.53	12.72	1.66	15.27	6.06	20.04	16.63	51.97	75.65	24.08	23.19	21.93	25.05	24.13
Vallejo-Fairfield, CA MSA	4,627	0.85	19.26	5.24	18.51	16.18	23.45	25.51	38.79	53.06	21.41	14.17	19.98	20.88	23.48
Visalia-Porterville, CA MSA	2,862	0.53	22.23	2.88	17.27	10.78	19.30	18.26	41.20	68.07	27.83	19.66	22.74	27.11	29.51
Yuba City, CA MSA	1,165	0.21	20.84	4.19	18.18	13.46	20.53	23.98	40.46	58.37	19.04	13.51	18.40	23.55	17.81

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 8.7% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES		Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fresno, CA MSA	12,737	1.39	68.03	63.98	93.23	3.70	3.07	25.44	38.13
Los Angeles-Long Beach-Glendale, CA MD	227,510	24.88	67.79	68.67	95.93	2.79	1.28	23.77	35.80
Oakland-Fremont-Hayward, CA MD	81,775	8.94	68.46	70.89	95.92	2.76	1.32	33.39	49.84
Riverside-San Bernardino-Ontario, CA MSA	59,151	6.47	69.30	72.87	96.02	2.57	1.41	24.92	37.57
San Francisco-San Mateo-Redwood City, CA MD	96,230	10.52	66.90	71.59	96.24	2.46	1.30	35.80	53.24
Santa Ana-Anaheim-Irvine, CA MD	113,812	12.45	68.30	69.00	95.72	2.84	1.44	29.80	42.59
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	9,639	1.05	70.62	65.95	94.62	2.86	2.52	25.68	39.37
Central CA Non-Metro	2,333	0.26	73.54	71.32	96.10	2.87	1.03	30.94	42.94
Chico, CA MSA	3,554	0.39	72.64	69.67	96.37	2.90	0.73	20.60	33.99
Eastern CA Non-Metro	174	0.02	70.51	83.33	94.25	2.87	2.87	13.21	23.27
El Centro, CA MSA	1,434	0.16	62.07	65.13	96.23	2.16	1.60	27.76	40.24
Hanford-Corcoran, CA MSA	1,174	0.13	69.30	60.31	95.83	2.30	1.87	26.89	34.81
Madera-Chowchilla, CA MSA	1,768	0.19	71.05	68.21	95.19	2.55	2.26	24.64	36.33
Merced, CA MSA	1,939	0.21	68.11	67.20	95.36	2.58	2.06	21.45	34.59
Modesto, CA MSA	5,789	0.63	69.91	71.48	95.35	3.21	1.43	22.06	34.32
Napa, CA MSA	3,806	0.42	70.32	70.49	95.38	3.02	1.60	27.94	39.43
Northern CA Non-Metro	4,904	0.54	69.96	71.02	95.70	3.16	1.14	25.75	37.75
Oxnard-Thousand Oaks-Ventura, CA MSA	22,235	2.43	70.39	71.75	96.70	2.33	0.96	29.68	43.19
Redding, CA MSA	2,644	0.29	72.41	70.42	97.13	2.27	0.61	21.66	32.60
Sacramento--Arden-Arcade--Roseville, CA MSA	56,994	6.23	69.51	71.60	96.02	2.65	1.33	33.24	47.31
Salinas, CA MSA	7,356	0.80	69.55	68.92	95.42	3.38	1.20	35.40	49.44
San Diego-Carlsbad-San Marcos, CA MSA	79,871	8.74	66.93	71.75	95.86	2.72	1.43	27.31	41.04
San Jose-Sunnyvale-Santa Clara, CA MSA	62,697	6.86	66.93	71.73	96.32	2.44	1.24	33.07	49.15
San Luis Obispo-Paso Robles, CA MSA	4,513	0.49	70.96	74.12	95.99	2.68	1.33	20.76	32.58
Santa Barbara-Santa Maria-Goleta, CA MSA	6,858	0.75	69.43	71.70	96.54	1.98	1.47	24.86	37.66
Santa Cruz-Watsonville, CA MSA	7,734	0.85	72.32	71.22	96.07	2.55	1.38	32.82	48.38
Santa Rosa-Petaluma, CA MSA	12,331	1.35	69.43	73.26	95.91	2.48	1.61	29.98	44.86
Stockton, CA MSA	8,512	0.93	68.69	71.73	95.56	2.62	1.82	24.71	35.37
Truckee-Grass Valley, CA Non-Metro	2,954	0.32	74.20	74.92	96.85	2.17	0.98	32.80	49.55
Vallejo-Fairfield, CA MSA	5,592	0.61	71.00	76.20	96.73	1.93	1.34	24.94	37.98
Visalia-Porterville, CA MSA	4,127	0.45	70.32	64.43	93.75	2.98	3.27	22.35	33.56
Yuba City, CA MSA	2,159	0.24	68.61	69.75	95.83	3.29	0.88	26.29	37.74

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 16.2% 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: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fresno, CA MSA	689	7.30	90.59	66.62	83.74	6.39	9.87	40.60	46.10
Los Angeles-Long Beach-Glendale, CA MD	770	8.16	95.03	53.77	92.73	6.75	0.52	69.01	74.81
Oakland-Fremont-Hayward, CA MD	392	4.15	94.67	79.85	96.17	3.57	0.26	65.43	79.05
Riverside-San Bernardino-Ontario, CA MSA	468	4.96	93.95	67.31	96.79	2.14	1.07	51.26	69.57
San Francisco-San Mateo-Redwood City, CA MD	346	3.67	94.37	73.41	95.38	4.34	0.29	70.86	86.02
Santa Ana-Anaheim-Irvine, CA MD	378	4.01	93.72	64.81	96.83	2.91	0.26	70.16	83.82
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	376	3.98	88.58	64.36	76.60	9.31	14.10	48.35	63.55
Central CA Non-Metro	91	0.96	97.19	70.33	90.11	9.89	0.00	65.38	63.89
Chico, CA MSA	167	1.77	95.76	82.63	95.81	3.59	0.60	36.49	41.24
Eastern CA Non-Metro	4	0.04	96.81	100.00	100.00	0.00	0.00	25.00	33.33
El Centro, CA MSA	82	0.87	82.85	56.10	76.83	8.54	14.63	27.96	32.43
Hanford-Corcoran, CA MSA	228	2.42	88.87	59.65	87.72	3.51	8.77	37.23	47.83
Madera-Chowchilla, CA MSA	253	2.68	92.01	69.57	88.54	7.91	3.56	42.07	44.55
Merced, CA MSA	197	2.09	91.31	65.99	88.32	4.06	7.61	19.43	26.79
Modesto, CA MSA	333	3.53	92.95	63.06	91.59	3.30	5.11	27.60	35.09
Napa, CA MSA	222	2.35	92.91	78.38	86.04	10.36	3.60	60.17	71.05
Northern CA Non-Metro	304	3.22	95.15	70.07	88.82	4.28	6.91	48.33	51.89
Oxnard-Thousand Oaks-Ventura, CA MSA	317	3.36	90.79	62.78	97.48	1.89	0.63	56.60	75.64
Redding, CA MSA	36	0.38	96.13	72.22	100.00	0.00	0.00	30.30	30.00
Sacramento--Arden-Arcade--Roseville, CA MSA	539	5.71	95.31	75.51	93.69	5.19	1.11	41.28	45.56
Salinas, CA MSA	243	2.58	84.19	65.43	83.13	4.12	12.76	61.82	82.35
San Diego-Carlsbad-San Marcos, CA MSA	489	5.18	94.81	65.24	97.55	1.64	0.82	54.55	66.41
San Jose-Sunnyvale-Santa Clara, CA MSA	277	2.94	93.66	76.53	92.78	7.22	0.00	60.00	74.67
San Luis Obispo-Paso Robles, CA MSA	267	2.83	96.16	70.79	95.88	3.00	1.12	46.99	58.95
Santa Barbara-Santa Maria-Goleta, CA MSA	193	2.05	91.16	66.32	94.82	4.15	1.04	36.88	44.00
Santa Cruz-Watsonville, CA MSA	204	2.16	92.77	54.41	90.20	3.92	5.88	73.49	91.89
Santa Rosa-Petaluma, CA MSA	350	3.71	94.66	75.43	92.29	5.14	2.57	52.63	62.39
Stockton, CA MSA	335	3.55	92.07	62.09	80.90	8.66	10.45	22.54	24.39
Truckee-Grass Valley, CA Non-Metro	27	0.29	98.27	100.00	100.00	0.00	0.00	43.48	60.00
Vallejo-Fairfield, CA MSA	61	0.65	96.09	73.77	86.89	1.64	11.48	28.07	35.29
Visalia-Porterville, CA MSA	624	6.61	89.00	65.71	82.85	5.93	11.22	40.73	49.06
Yuba City, CA MSA	175	1.85	94.30	77.14	94.86	1.71	3.43	30.54	36.44

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2011).

\*\*\*\* 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 17.7% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: CALIFORNIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Fresno, CA MSA	9	2,195	80	22,818	89	25,013	1.38	1	1,601
Los Angeles-Long Beach-Glendale, CA MD	78	121,603	379	322,514	457	444,118	24.53	5	735
Oakland-Fremont-Hayward, CA MD	36	50,239	299	113,975	335	164,214	9.08	2	42
Riverside-San Bernardino-Ontario, CA MSA	17	36,418	139	77,530	156	113,948	6.30	3	97
San Francisco-San Mateo-Redwood City, CA MD	35	48,194	449	124,563	484	172,758	9.55	2	4,126
Santa Ana-Anaheim-Irvine, CA MD	13	18,369	316	88,648	329	107,018	5.92	1	218
<b>Limited Review:</b>									
Bakersfield-Delano, CA MSA	7	12,910	25	8,846	32	21,757	1.20	0	0
Central CA Non-Metro	0	0	3	3	3	3	0.00	0	0
Chico, CA MSA	2	1,000	6	4,407	8	5,407	0.30	0	0
Eastern CA Non-Metro	0	0	1	10	1	10	0.00	0	0
El Centro, CA MSA	3	1,343	5	673	8	2,017	0.11	0	0
Hanford-Corcoran, CA MSA	2	540	3	11,056	5	11,596	0.64	0	0
Madera-Chowchilla, CA MSA	1	1,548	4	14,434	5	15,982	0.88	0	0
Merced, CA MSA	2	195	5	26,253	7	26,448	1.46	0	0
Modesto, CA MSA	2	151	10	11,194	12	11,345	0.63	0	0
Napa, CA MSA	2	948	6	1,529	8	2,476	0.14	0	0
Northern CA Non-Metro	6	6,118	9	9,545	15	15,663	0.87	0	0
Oxnard-Thousand Oaks-Ventura, CA MSA	9	6,409	34	44,461	43	50,871	2.81	0	0
Redding, CA MSA	2	374	4	25	6	399	0.02	0	0
Sacramento--Arden-Arcade--Roseville, CA MSA	27	28,140	160	63,634	187	91,774	5.08	2	1,603
Salinas, CA MSA	2	21,371	29	10,561	31	31,933	1.77	0	0
San Diego-Carlsbad-San Marcos, CA MSA	32	77,648	183	95,226	215	172,874	9.56	3	926
San Jose-Sunnyvale-Santa Clara, CA MSA	26	43,095	127	31,139	153	74,234	4.06	3	640
San Luis Obispo-Paso Robles, CA MSA	2	467	14	270	16	737	0.04	0	0
Santa Barbara-Santa Maria-Goleta, CA MSA	6	1,546	34	485	40	2,031	0.11	0	0
Santa Cruz-Watsonville, CA MSA	2	7,280	23	33,905	25	41,185	2.28	0	0
Santa Rosa-Petaluma, CA MSA	4	1,661	37	37,340	41	39,001	2.16	0	0
Stockton, CA MSA	4	1,214	19	601	23	1,815	0.10	1	1
Truckee-Grass Valley, CA Non-Metro	2	1,631	4	6	6	1,636	0.09	0	0
Vallejo-Fairfield, CA MSA	3	4,100	14	14,772	17	18,871	1.04	0	0
Visalia-Porterville, CA MSA	5	2,492	24	23,955	29	26,447	1.46	0	0
Yuba City, CA MSA	2	1,164	2	38	4	1,202	0.07	0	0
<b>Statewide:</b>									
California Statewide	13	31,238	7	83,342	20	114,580	6.34	6	9,037

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: CALIFORNIA		Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Fresno, CA MSA	1.34	15	1.44	6.67	20.00	20.00	53.33	0	1	0	0	0	-1	10.89	29.44	27.63	31.29
Los Angeles-Long Beach-Glendale, CA MD	21.92	243	23.39	5.76	14.81	28.81	50.62	19	32	0	1	0	-14	8.01	29.43	28.26	33.92
Oakland-Fremont-Hayward, CA MD	9.63	78	7.51	8.97	16.67	33.33	41.03	3	14	0	-1	-7	-3	12.53	20.80	34.45	32.23
Riverside-San Bernardino-Ontario, CA MSA	3.75	87	8.37	5.75	22.99	31.03	40.23	6	20	-1	-4	-5	-4	5.71	26.45	35.43	32.09
San Francisco-San Mateo-Redwood City, CA MD	19.78	84	8.08	22.62	11.90	28.57	36.90	3	13	-3	-1	-5	-1	11.07	19.31	37.59	31.74
Santa Ana-Anaheim-Irvine, CA MD	9.13	105	10.11	3.81	23.81	34.29	38.10	4	29	-1	-3	-9	-12	6.49	29.75	31.47	32.28
Limited Review:																	
Bakersfield-Delano, CA MSA	0.79	13	1.25	0.00	15.38	38.46	46.15	0	0	0	0	0	0	3.38	32.56	28.83	33.16
Central CA Non-Metro	0.20	5	0.48	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	0.68	55.73	41.01
Chico, CA MSA	0.31	7	0.67	0.00	28.57	57.14	14.29	0	2	0	-2	0	0	1.92	25.19	48.53	24.36
Eastern CA Non-Metro	0.00	0	0.00	0.00	0.00	0.00	0.00	0	0	0	0	0	0	0.00	10.32	41.21	48.48
El Centro, CA MSA	0.18	3	0.29	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	31.41	48.42	20.17
Hanford-Corcoran, CA MSA	0.12	2	0.19	0.00	50.00	0.00	50.00	0	1	0	-1	0	0	0.00	35.27	21.19	31.41
Madera-Chowchilla, CA MSA	0.13	3	0.29	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	41.01	46.06	12.92
Merced, CA MSA	0.13	4	0.39	0.00	50.00	25.00	25.00	0	0	0	0	0	0	2.70	30.80	36.30	30.20
Modesto, CA MSA	0.66	10	0.96	0.00	20.00	30.00	50.00	0	1	0	-1	0	0	3.01	19.75	44.49	32.74
Napa, CA MSA	0.31	5	0.48	0.00	80.00	20.00	0.00	1	2	0	0	-1	0	0.00	30.12	40.98	28.01
Northern CA Non-Metro	0.34	9	0.87	0.00	44.44	55.56	0.00	0	1	0	-1	0	0	1.02	25.33	66.42	7.23
Oxnard-Thousand Oaks-Ventura, CA MSA	2.14	29	2.79	0.00	34.48	48.28	17.24	2	4	0	-1	0	-1	5.38	26.09	40.80	27.72
Redding, CA MSA	0.16	2	0.19	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	26.93	51.36	21.70
Sacramento--Arden-Arcade--Roseville, CA MSA	4.80	71	6.83	4.23	15.49	53.52	26.76	1	20	-3	-1	-9	-6	7.15	23.70	37.93	30.90
Salinas, CA MSA	1.22	17	1.64	0.00	11.76	35.29	52.94	0	3	0	0	-2	-1	5.97	26.06	38.13	27.01
San Diego-Carlsbad-San Marcos, CA MSA	8.15	103	9.91	7.77	17.48	36.89	37.86	6	13	0	-4	-2	-1	9.80	21.57	35.24	33.05
San Jose-Sunnyvale-Santa Clara, CA MSA	9.84	65	6.26	7.69	24.62	30.77	36.92	0	9	-1	-1	-3	-4	8.95	25.33	37.20	28.38
San Luis Obispo-Paso Robles, CA MSA	0.38	8	0.77	12.50	12.50	50.00	25.00	2	1	0	-1	1	1	0.48	8.16	63.95	24.62
Santa Barbara-Santa Maria-Goleta, CA MSA	0.98	9	0.87	11.11	11.11	44.44	33.33	0	3	0	-1	0	-2	10.48	25.09	31.38	33.04
Santa Cruz-Watsonville, CA MSA	0.61	8	0.77	12.50	37.50	37.50	12.50	0	6	0	-1	-3	-2	2.56	34.19	34.41	28.83
Santa Rosa-Petaluma, CA MSA	1.36	16	1.54	6.25	18.75	56.25	18.75	0	3	0	-1	-2	0	0.43	24.20	55.15	20.22
Stockton, CA MSA	0.71	14	1.35	7.14	14.29	35.71	42.86	1	1	0	-1	0	1	5.71	26.08	32.39	35.83
Truckee-Grass Valley, CA Non-Metro	0.18	6	0.58	0.00	16.67	50.00	33.33	0	2	0	0	-1	-1	0.00	6.11	44.44	49.44
Vallejo-Fairfield, CA MSA	0.36	12	1.16	0.00	25.00	58.33	16.67	0	0	0	0	0	0	1.27	22.65	48.19	26.00
Visalia-Porterville, CA MSA	0.27	4	0.39	0.00	50.00	25.00	25.00	0	0	0	0	0	0	1.37	32.69	33.38	32.44
Yuba City, CA MSA	0.12	2	0.19	0.00	50.00	0.00	50.00	0	0	0	0	0	0	2.02	28.10	36.24	33.65

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: COLORADO								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Denver-Aurora-Broomfield, CO MSA	52.12	93,538	21,079,497	75,600	2,693,754	432	14,580	56	235,395	169,626	24,023,226	65.58
Limited Review:												
Boulder, CO MSA	6.84	11,536	3,029,499	10,540	424,421	58	1,196	4	7,528	22,138	3,462,644	7.46
Canon City, CO Non-Metro	0.70	1,624	246,388	613	28,309	37	1,682	0	0	2,274	276,379	0.32
Colorado Springs, CO MSA	12.40	26,670	5,688,819	13,343	469,113	92	2,348	13	27,148	40,118	6,187,428	6.91
Durango, CO Non-Metro	1.78	3,159	775,719	2,505	103,954	96	3,789	4	960	5,764	884,422	2.41
Fort Collins-Loveland, CO MSA	6.36	12,341	2,568,605	8,052	286,183	179	7,841	5	20,568	20,577	2,883,197	3.75
Grand Junction, CO MSA	4.21	8,251	1,628,081	5,219	305,114	148	10,306	0	0	13,618	1,943,501	3.36
Greeley, CO MSA	4.21	8,811	1,635,367	4,520	195,305	270	19,251	6	1,941	13,607	1,851,864	1.90
Pueblo, CO MSA	2.04	4,397	606,740	2,186	95,917	20	1,148	2	625	6,605	704,430	1.69
Sterling-Fort Morgan, CO Non-Metro	0.69	729	92,167	891	57,316	595	59,389	1	100	2,216	208,972	0.72
Western CO Non-Metro	8.64	18,214	5,401,515	9,121	472,510	615	52,395	2	6,686	27,952	5,933,106	5.90

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: COLORADO								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	35,623	52.31	1.89	2.40	21.89	17.42	42.97	44.05	33.26	36.13	18.45	16.31	16.73	19.78	17.84
<b>Limited Review:</b>															
Boulder, CO MSA	3,390	4.98	0.27	0.47	19.36	21.06	44.99	47.99	35.39	30.47	16.37	14.81	16.38	16.78	15.83
Canon City, CO Non-Metro	568	0.83	0.00	0.00	0.00	0.00	98.19	94.72	1.81	5.28	25.22	0.00	0.00	26.20	12.50
Colorado Springs, CO MSA	9,472	13.91	0.11	0.11	18.75	14.51	51.81	53.44	29.33	31.95	23.13	20.00	25.59	23.99	20.71
Durango, CO Non-Metro	903	1.33	0.00	0.00	0.00	0.00	85.12	84.27	14.88	15.73	24.51	0.00	0.00	26.75	13.77
Fort Collins-Loveland, CO MSA	4,136	6.07	1.28	0.15	13.61	13.73	62.79	53.46	22.32	32.66	17.83	36.36	17.11	17.53	18.56
Grand Junction, CO MSA	2,711	3.98	0.00	0.00	14.19	16.82	60.18	58.65	25.63	24.53	22.58	0.00	24.68	21.23	24.71
Greeley, CO MSA	4,053	5.95	0.70	0.32	14.59	10.34	53.62	49.10	31.09	40.24	21.60	50.00	25.06	22.64	19.63
Pueblo, CO MSA	1,896	2.78	0.00	0.00	24.22	14.45	46.83	44.30	28.95	41.24	21.88	0.00	24.10	21.37	21.79
Sterling-Fort Morgan, CO Non-Metro	311	0.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	16.30	0.00	0.00	16.30	0.00
Western CO Non-Metro	5,036	7.40	0.00	0.00	2.56	1.47	41.23	33.06	56.22	65.47	25.67	0.00	34.48	30.83	23.83

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: COLORADO								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	1,656	40.59	1.89	2.11	21.89	12.56	42.97	37.62	33.26	47.71	16.90	22.22	13.33	14.85	20.00
<b>Limited Review:</b>															
Boulder, CO MSA	219	5.37	0.27	0.00	19.36	12.79	44.99	53.42	35.39	33.79	18.73	0.00	18.60	20.31	16.67
Canon City, CO Non-Metro	59	1.45	0.00	0.00	0.00	0.00	98.19	93.22	1.81	6.78	32.56	0.00	0.00	30.00	66.67
Colorado Springs, CO MSA	461	11.30	0.11	0.22	18.75	10.41	51.81	45.99	29.33	43.38	14.75	0.00	10.38	14.07	18.26
Durango, CO Non-Metro	134	3.28	0.00	0.00	0.00	0.00	85.12	85.07	14.88	14.93	40.00	0.00	0.00	38.78	50.00
Fort Collins-Loveland, CO MSA	248	6.08	1.28	0.00	13.61	13.31	62.79	56.85	22.32	29.84	17.11	0.00	13.64	18.83	16.33
Grand Junction, CO MSA	324	7.94	0.00	0.00	14.19	11.42	60.18	65.74	25.63	22.84	27.18	0.00	19.23	28.24	28.95
Greeley, CO MSA	174	4.26	0.70	0.57	14.59	8.62	53.62	50.00	31.09	40.80	26.26	0.00	41.67	23.47	27.54
Pueblo, CO MSA	108	2.65	0.00	0.00	24.22	12.04	46.83	43.52	28.95	44.44	15.90	0.00	19.35	12.50	19.12
Sterling-Fort Morgan, CO Non-Metro	38	0.93	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	25.00	0.00	0.00	25.00	0.00
Western CO Non-Metro	659	16.15	0.00	0.00	2.56	1.06	41.23	34.60	56.22	64.34	32.21	0.00	33.33	42.47	28.19

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	55,138	47.58	1.89	1.27	21.89	10.14	42.97	38.94	33.26	49.65	16.20	13.34	15.65	17.26	15.60
<b>Limited Review:</b>															
Boulder, CO MSA	7,908	6.82	0.27	0.15	19.36	14.21	44.99	47.74	35.39	37.90	15.47	13.16	15.47	16.62	14.22
Canon City, CO Non-Metro	995	0.86	0.00	0.00	0.00	0.00	98.19	90.65	1.81	9.35	24.87	0.00	0.00	24.48	30.26
Colorado Springs, CO MSA	16,720	14.43	0.11	0.07	18.75	8.62	51.81	47.70	29.33	43.61	20.82	11.76	20.42	21.33	20.35
Durango, CO Non-Metro	2,122	1.83	0.00	0.00	0.00	0.00	85.12	83.27	14.88	16.73	22.56	0.00	0.00	22.71	22.04
Fort Collins-Loveland, CO MSA	7,951	6.86	1.28	0.11	13.61	9.23	62.79	54.84	22.32	35.82	17.88	15.38	17.94	17.51	18.50
Grand Junction, CO MSA	5,203	4.49	0.00	0.00	14.19	11.80	60.18	58.50	25.63	29.69	25.36	0.00	25.00	24.87	26.46
Greeley, CO MSA	4,579	3.95	0.70	0.24	14.59	4.19	53.62	46.28	31.09	49.29	20.19	37.50	24.90	19.30	20.63
Pueblo, CO MSA	2,392	2.06	0.00	0.00	24.22	9.24	46.83	41.81	28.95	48.95	17.89	0.00	20.50	18.93	16.52
Sterling-Fort Morgan, CO Non-Metro	379	0.33	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.44	0.00	0.00	20.44	0.00
Western CO Non-Metro	12,510	10.79	0.00	0.00	2.56	1.18	41.23	35.51	56.22	63.32	26.25	0.00	35.23	36.25	22.97

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY		Geography: COLORADO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	50	43.86	8.54	14.00	40.67	36.00	42.00	46.00	8.79	4.00	5.97	6.98	5.26	7.25	0.00
<b>Limited Review:</b>															
Boulder, CO MSA	11	9.65	5.73	0.00	38.53	45.45	42.03	54.55	13.71	0.00	10.34	0.00	9.52	16.67	0.00
Canon City, CO Non-Metro	2	1.75	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
Colorado Springs, CO MSA	17	14.91	0.76	0.00	43.30	35.29	44.47	52.94	11.47	11.76	12.90	0.00	12.50	16.67	0.00
Durango, CO Non-Metro	0	0.00	0.00	0.00	0.00	0.00	75.85	0.00	24.15	0.00	0.00	0.00	0.00	0.00	0.00
Fort Collins-Loveland, CO MSA	6	5.26	3.99	0.00	39.68	66.67	46.38	0.00	9.95	33.33	13.33	0.00	16.67	0.00	50.00
Grand Junction, CO MSA	13	11.40	0.00	0.00	21.50	30.77	52.56	61.54	25.94	7.69	44.44	0.00	0.00	50.00	0.00
Greeley, CO MSA	5	4.39	9.66	0.00	49.21	60.00	27.61	40.00	13.52	0.00	0.00	0.00	0.00	0.00	0.00
Pueblo, CO MSA	0	0.00	0.00	0.00	46.91	0.00	48.33	0.00	4.76	0.00	0.00	0.00	0.00	0.00	0.00
Sterling-Fort Morgan, CO Non-Metro	1	0.88	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
Western CO Non-Metro	9	7.89	0.00	0.00	0.84	0.00	7.50	44.44	91.66	55.56	17.65	0.00	0.00	33.33	14.29

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	74,730	56.74	3.23	2.76	20.61	19.16	37.60	34.54	37.57	43.55	27.32	22.86	25.55	26.92	29.59
<b>Limited Review:</b>															
Boulder, CO MSA	10,534	8.00	1.04	0.66	27.10	24.38	39.93	39.49	31.92	35.48	27.67	21.13	24.44	28.48	30.06
Canon City, CO Non-Metro	613	0.47	0.00	0.00	0.00	0.00	96.51	95.60	3.42	4.40	29.63	0.00	0.00	29.95	42.86
Colorado Springs, CO MSA	13,343	10.13	3.54	4.47	19.38	19.13	44.57	37.77	32.51	38.62	25.18	49.16	23.10	22.10	27.89
Durango, CO Non-Metro	2,505	1.90	0.00	0.00	0.00	0.00	88.83	89.06	11.17	10.94	36.66	0.00	0.00	39.27	30.21
Fort Collins-Loveland, CO MSA	8,052	6.11	0.88	0.96	20.30	22.53	51.81	45.24	27.00	31.27	26.72	30.99	28.06	26.03	28.44
Grand Junction, CO MSA	5,219	3.96	0.00	0.00	21.89	24.37	52.76	48.63	25.35	27.00	37.56	0.00	36.49	38.93	38.64
Greeley, CO MSA	4,520	3.43	2.89	3.10	10.48	9.85	48.50	41.08	38.07	45.97	24.24	25.81	26.81	21.88	28.08
Pueblo, CO MSA	2,186	1.66	0.00	0.00	27.89	33.03	38.49	36.83	33.53	30.15	26.02	0.00	28.48	27.44	23.64
Sterling-Fort Morgan, CO Non-Metro	891	0.68	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	27.80	0.00	0.00	28.54	0.00
Western CO Non-Metro	9,121	6.92	0.00	0.00	2.91	5.72	29.39	38.70	67.71	55.58	32.80	0.00	49.54	38.35	33.43

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms															
Geography: COLORADO															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
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	426	16.80	1.55	0.94	18.64	7.98	41.31	48.12	37.99	42.96	37.67	0.00	52.38	32.14	45.74
<b>Limited Review:</b>															
Boulder, CO MSA	58	2.29	0.00	0.00	21.36	18.97	47.57	55.17	30.96	25.86	46.81	0.00	55.56	52.17	33.33
Canon City, CO Non-Metro	37	1.46	0.00	0.00	0.00	0.00	96.80	100.00	3.20	0.00	88.24	0.00	0.00	88.24	0.00
Colorado Springs, CO MSA	92	3.63	1.90	1.09	14.89	3.26	54.89	45.65	28.33	50.00	53.33	0.00	0.00	48.00	63.16
Durango, CO Non-Metro	96	3.79	0.00	0.00	0.00	0.00	91.59	94.79	8.41	5.21	53.06	0.00	0.00	56.82	50.00
Fort Collins-Loveland, CO MSA	179	7.06	0.92	0.00	14.13	3.35	56.22	73.18	28.73	23.46	48.98	0.00	37.50	55.56	41.67
Grand Junction, CO MSA	148	5.84	0.00	0.00	6.72	3.38	70.22	82.43	23.06	14.19	68.33	0.00	100.00	72.34	54.55
Greeley, CO MSA	270	10.65	0.70	0.74	6.33	4.07	66.22	75.19	26.74	20.00	22.61	0.00	18.18	24.23	20.27
Pueblo, CO MSA	20	0.79	0.00	0.00	17.25	20.00	39.74	25.00	43.01	55.00	18.18	0.00	16.67	12.50	27.27
Sterling-Fort Morgan, CO Non-Metro	595	23.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	29.37	0.00	0.00	29.44	0.00
Western CO Non-Metro	615	24.25	0.00	0.00	1.47	1.14	46.48	84.72	52.05	14.15	66.31	0.00	100.00	69.72	57.41

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: COLORADO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	36,009	52.58	18.01	12.97	18.65	26.43	23.68	25.66	39.66	34.95	19.00	19.11	18.61	20.16	18.49
<b>Limited Review:</b>															
Boulder, CO MSA	3,392	4.95	19.44	12.61	18.52	23.59	22.39	24.44	39.66	39.36	17.38	18.04	17.26	17.06	17.45
Canon City, CO Non-Metro	568	0.83	21.27	10.28	20.87	27.34	24.78	24.59	33.07	37.80	25.47	17.39	27.46	26.27	26.62
Colorado Springs, CO MSA	9,472	13.83	16.86	9.58	18.85	29.77	24.72	28.39	39.57	32.26	24.43	19.89	25.88	25.67	23.80
Durango, CO Non-Metro	903	1.32	16.12	2.03	17.56	12.61	23.53	19.37	42.79	65.99	27.24	26.09	25.98	25.61	28.11
Fort Collins-Loveland, CO MSA	4,136	6.04	16.76	11.75	19.36	26.59	25.32	25.62	38.56	36.04	19.09	19.66	20.56	19.15	17.92
Grand Junction, CO MSA	2,711	3.96	17.40	7.06	19.63	20.92	23.69	27.12	39.28	44.90	22.25	18.14	21.67	21.62	25.57
Greeley, CO MSA	4,053	5.92	19.33	13.69	17.93	26.90	24.16	27.46	38.59	31.94	21.47	25.25	21.29	22.05	19.55
Pueblo, CO MSA	1,896	2.77	20.21	8.99	18.34	22.85	21.79	29.06	39.67	39.10	21.22	18.84	19.92	22.60	21.72
Sterling-Fort Morgan, CO Non-Metro	311	0.45	21.35	14.33	23.33	27.99	23.94	25.60	31.38	32.08	15.48	11.27	14.17	20.43	15.45
Western CO Non-Metro	5,036	7.35	13.96	2.23	15.88	11.16	22.03	18.37	48.12	68.23	26.76	23.28	26.17	28.21	26.73

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.4% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: COLORADO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	1,666	40.73	18.01	7.32	18.65	19.57	23.68	23.41	39.66	49.70	17.51	13.69	16.49	16.29	19.89
<b>Limited Review:</b>															
Boulder, CO MSA	219	5.35	19.44	8.88	18.52	19.63	22.39	27.10	39.66	44.39	20.58	28.00	19.61	19.72	19.79
Canon City, CO Non-Metro	59	1.44	21.27	11.86	20.87	22.03	24.78	28.81	33.07	37.29	34.15	50.00	27.27	42.86	26.67
Colorado Springs, CO MSA	461	11.27	16.86	8.13	18.85	18.90	24.72	24.84	39.57	48.13	14.82	7.79	14.55	13.55	17.57
Durango, CO Non-Metro	134	3.28	16.12	2.26	17.56	19.55	23.53	21.80	42.79	56.39	42.00	0.00	37.50	30.77	51.85
Fort Collins-Loveland, CO MSA	248	6.06	16.76	6.88	19.36	21.05	25.32	25.10	38.56	46.96	18.41	13.89	19.05	21.15	18.25
Grand Junction, CO MSA	324	7.92	17.40	7.28	19.63	14.87	23.69	28.80	39.28	49.05	27.01	22.73	35.29	25.49	25.37
Greeley, CO MSA	174	4.25	19.33	6.94	17.93	24.28	24.16	26.01	38.59	42.77	26.70	16.67	25.64	27.27	29.33
Pueblo, CO MSA	108	2.64	20.21	8.65	18.34	20.19	21.79	25.96	39.67	45.19	14.84	17.65	12.50	17.39	13.79
Sterling-Fort Morgan, CO Non-Metro	38	0.93	21.35	21.62	23.33	10.81	23.94	16.22	31.38	51.35	26.09	28.57	14.29	40.00	22.73
Western CO Non-Metro	659	16.11	13.96	2.32	15.88	11.13	22.03	21.79	48.12	64.76	33.62	30.00	45.45	38.18	30.41

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Denver-Aurora-Broomfield, CO MSA	55,812	47.88	18.01	4.88	18.65	15.37	23.68	25.01	39.66	54.73	16.35	14.28	15.87	15.83	17.04
<b>Limited Review:</b>															
Boulder, CO MSA	7,914	6.79	19.44	6.88	18.52	17.04	22.39	26.49	39.66	49.60	16.72	14.19	15.64	18.16	16.82
Canon City, CO Non-Metro	995	0.85	21.27	6.02	20.87	18.19	24.78	28.43	33.07	47.35	27.21	23.88	27.10	27.84	27.42
Colorado Springs, CO MSA	16,720	14.34	16.86	6.40	18.85	17.08	24.72	24.35	39.57	52.18	18.27	17.91	17.09	18.11	18.83
Durango, CO Non-Metro	2,122	1.82	16.12	2.03	17.56	10.07	23.53	19.33	42.79	68.57	25.35	18.84	22.12	25.08	26.64
Fort Collins-Loveland, CO MSA	7,951	6.82	16.76	6.39	19.36	17.91	25.32	26.42	38.56	49.27	19.34	16.77	18.69	19.06	20.27
Grand Junction, CO MSA	5,203	4.46	17.40	5.75	19.63	15.01	23.69	25.61	39.28	53.63	27.36	24.81	26.15	25.14	29.96
Greeley, CO MSA	4,579	3.93	19.33	4.15	17.93	14.47	24.16	24.84	38.59	56.54	20.34	14.43	19.04	19.88	21.78
Pueblo, CO MSA	2,393	2.05	20.21	5.16	18.34	15.37	21.79	24.26	39.67	55.21	16.88	16.46	16.67	16.26	17.29
Sterling-Fort Morgan, CO Non-Metro	379	0.33	21.35	3.57	23.33	12.66	23.94	24.03	31.38	59.74	20.39	3.85	17.39	21.05	23.44
Western CO Non-Metro	12,510	10.73	13.96	2.05	15.88	8.96	22.03	18.16	48.12	70.83	28.31	26.95	27.03	29.33	28.32

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 18.8% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: COLORADO			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	75,600	57.02	68.67	75.53	95.95	2.27	1.78	27.32	41.24
<b>Limited Review:</b>									
Boulder, CO MSA	10,540	7.95	68.45	74.51	94.65	2.83	2.52	27.67	42.56
Canon City, CO Non-Metro	613	0.46	73.27	75.37	90.86	5.06	4.08	29.63	44.89
Colorado Springs, CO MSA	13,343	10.06	70.75	76.34	96.24	2.15	1.61	25.18	37.52
Durango, CO Non-Metro	2,505	1.89	73.42	77.21	93.81	3.91	2.28	36.66	51.54
Fort Collins-Loveland, CO MSA	8,052	6.07	72.53	77.67	95.16	2.84	2.00	26.72	43.30
Grand Junction, CO MSA	5,219	3.94	74.29	67.85	90.38	4.69	4.92	37.56	49.74
Greeley, CO MSA	4,520	3.41	72.84	74.51	94.65	2.52	2.83	24.24	37.06
Pueblo, CO MSA	2,186	1.65	70.78	67.57	94.05	3.34	2.61	26.02	36.28
Sterling-Fort Morgan, CO Non-Metro	891	0.67	72.98	60.61	86.87	7.86	5.27	27.80	34.94
Western CO Non-Metro	9,121	6.88	69.91	70.13	91.68	4.35	3.97	32.80	45.70

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.0% 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, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Denver-Aurora-Broomfield, CO MSA	432	16.99	96.45	87.04	96.06	2.31	1.62	37.67	42.15
<b>Limited Review:</b>									
Boulder, CO MSA	58	2.28	97.09	70.69	100.00	0.00	0.00	46.81	56.00
Canon City, CO Non-Metro	37	1.46	98.22	72.97	91.89	8.11	0.00	88.24	100.00
Colorado Springs, CO MSA	92	3.62	96.92	89.13	98.91	0.00	1.09	53.33	61.76
Durango, CO Non-Metro	96	3.78	98.71	86.46	96.88	3.13	0.00	53.06	74.19
Fort Collins-Loveland, CO MSA	179	7.04	97.62	82.68	93.85	1.68	4.47	48.98	62.12
Grand Junction, CO MSA	148	5.82	98.81	75.00	82.43	12.16	5.41	68.33	80.00
Greeley, CO MSA	270	10.62	94.96	73.70	81.85	12.96	5.19	22.61	23.74
Pueblo, CO MSA	20	0.79	98.03	100.00	95.00	5.00	0.00	18.18	26.09
Sterling-Fort Morgan, CO Non-Metro	595	23.41	95.80	53.95	70.92	18.15	10.92	29.37	26.25
Western CO Non-Metro	615	24.19	97.65	66.02	73.82	17.72	8.46	66.31	70.86

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 21.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS									
Geography: COLORADO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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-Broomfield, CO MSA	34	53,487	161	84,629	195	138,116	73.89	2	4,001
<b>Limited Review:</b>									
Boulder, CO MSA	4	2,774	11	8,231	15	11,005	5.89	1	159
Canon City, CO Non-Metro	0	0	8	9	8	9	0.00	0	0
Colorado Springs, CO MSA	2	2,577	19	240	21	2,817	1.51	0	0
Durango, CO Non-Metro	1	119	9	77	10	196	0.11	0	0
Fort Collins-Loveland, CO MSA	4	918	9	12,858	13	13,776	7.37	1	79
Grand Junction, CO MSA	3	4,008	7	71	10	4,078	2.18	1	79
Greeley, CO MSA	2	7,745	4	10	6	7,755	4.34	1	59
Pueblo, CO MSA	3	1,043	4	2,404	7	3,447	1.84	1	40
Sterling-Fort Morgan, CO Non-Metro	0	0	2	20	2	20	0.01	0	0
Western CO Non-Metro	6	2,715	16	2,480	22	5,195	2.78	1	190
<b>Statewide:</b>									
Colorado Statewide	1	150	0	0	1	150	0.08	1	74

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: COLORADO				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches in AA	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Denver-Aurora-Broomfield, CO MSA	65.58	84	50.00	9.52	16.67	46.43	27.38	0	10	-1	-4	-3	-2	11.14	23.08	33.37	32.36		
Limited Review:																			
Boulder, CO MSA	7.46	12	7.14	0.00	50.00	41.67	8.33	0	1	0	-1	0	0	6.89	18.39	45.80	28.91		
Canon City, CO Non-Metro	0.32	3	1.79	0.00	33.33	66.67	0.00	0	2	0	-1	-1	0	0.00	40.75	40.26	3.43		
Colorado Springs, CO MSA	6.91	17	10.12	11.76	11.76	41.18	35.29	2	2	0	-1	0	1	4.28	26.49	41.98	26.55		
Durango, CO Non-Metro	2.41	3	1.79	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	56.43	43.57		
Fort Collins-Loveland, CO MSA	3.75	7	4.17	0.00	0.00	85.71	14.29	0	0	0	0	0	0	2.64	22.37	48.27	26.69		
Grand Junction, CO MSA	3.36	7	4.17	0.00	28.57	57.14	14.29	0	1	0	0	-1	0	0.00	17.15	60.53	22.32		
Greeley, CO MSA	1.90	7	4.17	14.29	28.57	42.86	14.29	0	0	0	0	0	0	9.68	19.79	43.99	25.80		
Pueblo, CO MSA	1.69	5	2.98	20.00	40.00	20.00	20.00	0	1	0	-1	0	0	7.79	23.43	35.03	32.43		
Sterling-Fort Morgan, CO Non-Metro	0.72	2	1.19	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	14.80	80.08	5.11		
Western CO Non-Metro	5.90	21	12.50	0.00	9.52	33.33	57.14	0	0	0	0	0	0	0.00	10.58	38.88	50.54		

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: CONNECTICUT												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Bridgeport-Stamford-Norwalk, CT MSA	35.19	10,730	3,789,433	3,600	138,002	21	356	1	3,200	14,352	3,930,991	53.30
New Haven-Milford, CT MSA	25.56	7,903	1,654,398	2,501	112,828	16	330	5	5,046	10,425	1,772,602	33.55
<b>Limited Review:</b>												
Hartford-West Hartford-East Hartford, CT MSA	33.90	12,215	2,609,792	1,603	69,347	5	109	0	0	13,823	2,679,248	10.41
Litchfield County, CT Non-Metro	5.35	1,774	381,562	400	17,685	7	70	0	0	2,181	399,317	2.73

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	3,275	29.85	3.34	4.09	16.53	22.08	39.53	40.09	40.60	33.74	17.30	27.69	21.61	18.78	13.33
New Haven-Milford, CT MSA	2,731	24.90	3.04	2.53	12.33	12.96	52.39	55.58	32.24	28.93	19.05	22.11	20.64	20.28	16.22
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	4,410	40.20	2.33	1.84	9.56	10.45	53.21	54.63	34.90	33.08	17.17	12.38	21.04	17.95	15.40
Litchfield County, CT Non-Metro	554	5.05	0.00	0.00	4.21	3.79	62.74	60.47	33.05	35.74	16.76	0.00	17.91	16.54	17.05

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: CONNECTICUT								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Bridgeport-Stamford-Norwalk, CT MSA	180	29.70	3.34	2.78	16.53	14.44	39.53	35.00	40.60	47.78	10.96	23.53	16.67	11.02	9.27	
New Haven-Milford, CT MSA	186	30.69	3.04	2.15	12.33	12.37	52.39	46.77	32.24	38.71	10.32	10.71	17.27	9.50	9.64	
Limited Review:																
Hartford-West Hartford-East Hartford, CT MSA	208	34.32	2.33	1.92	9.56	7.69	53.21	50.00	34.90	40.38	5.46	11.43	6.75	4.89	5.85	
Litchfield County, CT Non-Metro	32	5.28	0.00	0.00	4.21	3.13	62.74	56.25	33.05	40.63	3.39	0.00	8.33	2.80	4.13	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	7,273	34.58	3.34	1.00	16.53	8.40	39.53	41.51	40.60	49.09	15.75	17.55	15.50	17.75	14.39
New Haven-Milford, CT MSA	4,983	23.69	3.04	1.20	12.33	6.46	52.39	48.65	32.24	43.69	16.56	19.78	18.11	17.31	15.46
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	7,587	36.08	2.33	1.04	9.56	4.81	53.21	50.63	34.90	43.52	13.86	18.52	15.07	14.63	12.77
Litchfield County, CT Non-Metro	1,188	5.65	0.00	0.00	4.21	2.53	62.74	53.96	33.05	43.52	14.46	0.00	23.53	13.77	14.97

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: CONNECTICUT				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	2	13.33	20.80	100.00	42.87	0.00	29.03	0.00	7.31	0.00	2.38	9.09	0.00	0.00	0.00
New Haven-Milford, CT MSA	3	20.00	20.52	0.00	29.27	66.67	42.05	33.33	8.16	0.00	1.41	0.00	0.00	0.00	12.50
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	10	66.67	26.86	10.00	21.47	10.00	39.96	40.00	11.71	40.00	8.75	0.00	0.00	11.11	50.00
Litchfield County, CT Non-Metro	0	0.00	0.00	0.00	10.71	0.00	70.82	0.00	18.47	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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	3,600	44.43	7.56	6.39	19.04	16.36	33.66	36.58	39.74	40.67	9.54	9.12	9.52	10.02	9.52
New Haven-Milford, CT MSA	2,501	30.87	7.47	5.48	17.54	14.03	43.19	43.98	31.78	36.51	10.46	9.21	9.52	11.00	10.80
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	1,601	19.76	8.68	5.87	11.71	9.62	48.27	51.84	31.10	32.67	5.17	5.54	4.66	5.32	5.33
Litchfield County, CT Non-Metro	400	4.94	0.00	0.00	5.92	6.50	59.78	47.75	34.29	45.75	7.04	0.00	7.22	6.30	8.97

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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	21	42.86	5.30	4.76	20.26	4.76	35.42	19.05	39.02	71.43	41.67	100.00	20.00	75.00	40.00
New Haven-Milford, CT MSA	16	32.65	2.83	0.00	11.09	0.00	42.07	31.25	44.02	68.75	44.00	0.00	0.00	80.00	38.89
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	5	10.20	1.76	0.00	6.54	0.00	50.57	60.00	41.10	40.00	7.89	0.00	0.00	10.00	5.88
Litchfield County, CT Non-Metro	7	14.29	0.00	0.00	2.00	0.00	57.28	28.57	40.72	71.43	23.81	0.00	0.00	15.38	37.50

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	3,275	29.85	21.61	12.45	17.25	23.92	19.58	23.04	41.56	40.58	18.43	20.62	20.53	20.73	15.90
New Haven-Milford, CT MSA	2,731	24.90	20.85	8.79	17.34	33.01	22.55	29.43	39.26	28.77	19.17	21.27	19.99	20.90	16.13
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	4,410	40.20	20.19	11.91	17.69	30.92	23.41	27.86	38.71	29.31	17.79	17.22	18.05	19.10	16.65
Litchfield County, CT Non-Metro	554	5.05	14.09	10.44	17.23	34.62	25.90	26.89	42.79	28.05	16.65	15.18	18.76	18.80	13.51

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.6% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	180	29.70	21.61	6.98	17.25	25.58	19.58	20.93	41.56	46.51	10.82	6.14	15.18	10.28	10.38
New Haven-Milford, CT MSA	186	30.69	20.85	9.55	17.34	21.91	22.55	26.97	39.26	41.57	10.03	7.96	10.41	9.83	10.44
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	208	34.32	20.19	8.42	17.69	26.73	23.41	25.25	38.71	39.60	5.35	2.70	7.21	4.91	5.33
Litchfield County, CT Non-Metro	32	5.28	14.09	9.38	17.23	21.88	25.90	28.13	42.79	40.63	3.50	6.06	7.58	1.89	2.41

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.6% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: CONNECTICUT						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bridgeport-Stamford-Norwalk, CT MSA	7,273	34.58	21.61	4.91	17.25	14.65	19.58	21.88	41.56	58.56	17.07	15.63	16.73	18.89	16.69
New Haven-Milford, CT MSA	4,983	23.69	20.85	3.91	17.34	16.23	22.55	27.09	39.26	52.77	16.95	14.22	15.55	17.16	17.66
<b>Limited Review:</b>															
Hartford-West Hartford-East Hartford, CT MSA	7,587	36.08	20.19	5.32	17.69	17.30	23.41	28.46	38.71	48.92	14.12	12.69	13.42	13.89	14.77
Litchfield County, CT Non-Metro	1,188	5.65	14.09	4.63	17.23	16.37	25.90	24.70	42.79	54.30	15.07	11.16	14.60	13.58	16.65

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 8.5% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: CONNECTICUT		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Bridgeport-Stamford-Norwalk, CT MSA	3,600	44.42	68.81	61.06	94.86	3.69	1.44	9.54	14.59	
New Haven-Milford, CT MSA	2,501	30.86	68.18	58.74	91.92	5.72	2.36	10.46	15.64	
<b>Limited Review:</b>										
Hartford-West Hartford-East Hartford, CT MSA	1,603	19.78	67.89	64.32	94.64	3.56	1.81	5.17	8.40	
Litchfield County, CT Non-Metro	400	4.94	72.51	63.50	95.25	2.25	2.50	7.04	9.99	

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 21.4% 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, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Bridgeport-Stamford-Norwalk, CT MSA	21	42.86	97.25	71.43	100.00	0.00	0.00	41.67	60.00
New Haven-Milford, CT MSA	16	32.65	96.79	81.25	100.00	0.00	0.00	44.00	64.29
<b>Limited Review:</b>									
Hartford-West Hartford-East Hartford, CT MSA	5	10.20	96.85	100.00	100.00	0.00	0.00	7.89	15.38
Litchfield County, CT Non-Metro	7	14.29	98.48	71.43	100.00	0.00	0.00	23.81	40.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 12.2% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: CONNECTICUT		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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 MSA	0	0	71	17,338	71	17,338	49.14	0	0
New Haven-Milford, CT MSA	0	0	43	14,422	43	14,422	40.87	0	0
<b>Limited Review:</b>									
Hartford-West Hartford-East Hartford, CT MSA	0	0	24	3,283	24	3,283	9.30	0	0
Litchfield County, CT Non-Metro	1	240	1	1	2	241	0.68	0	0
<b>Statewide:</b>									
Connecticut Statewide	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																		Geography: CONNECTICUT				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
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	53.30	34	45.95	5.88	20.59	35.29	38.24	0	1	0	0	-1	0	13.48	19.50	33.65	33.38														
New Haven-Milford, CT MSA	33.55	30	40.54	3.33	23.33	43.33	30.00	0	0	0	0	0	0	11.07	21.98	35.57	31.38														
<b>Limited Review:</b>																															
Hartford-West Hartford-East Hartford, CT MSA	10.41	7	9.46	14.29	14.29	42.86	28.57	0	2	-2	0	0	0	11.76	13.99	41.64	31.30														
Litchfield County, CT Non-Metro	2.73	3	4.05	0.00	0.00	33.33	66.67	0	0	0	0	0	0	0.00	12.90	56.03	31.07														

**Table 1. Lending Volume**

LENDING VOLUME		Geography: DELAWARE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Wilmington, DE MD	57.70	7,479	1,593,651	1,135	54,440	3	278	0	0	8,617	1,648,369	81.51
Limited Review:												
Dover, DE MSA	17.48	2,385	432,267	221	13,255	4	50	0	0	2,610	445,572	7.08
Sussex County, DE Non-Metro	24.82	3,434	802,600	270	12,643	2	36	0	0	3,706	815,279	11.41

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wilmington, DE MD	3,025	54.88	1.53	0.79	14.54	14.74	51.24	51.24	32.69	33.22	23.51	11.30	22.77	23.36	24.64
<b>Limited Review:</b>															
Dover, DE MSA	1,117	20.26	0.00	0.00	5.30	2.95	82.64	85.59	12.06	11.46	27.10	0.00	15.48	27.54	27.35
Sussex County, DE Non-Metro	1,370	24.85	0.00	0.00	0.00	0.00	90.18	81.31	9.82	18.69	22.04	0.00	0.00	21.68	23.97

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wilmington, DE MD	234	58.21	1.53	0.85	14.54	11.11	51.24	44.44	32.69	43.59	14.96	11.11	15.18	13.44	17.38
<b>Limited Review:</b>															
Dover, DE MSA	74	18.41	0.00	0.00	5.30	2.70	82.64	81.08	12.06	16.22	19.01	0.00	14.29	18.23	25.00
Sussex County, DE Non-Metro	94	23.38	0.00	0.00	0.00	0.00	90.18	79.79	9.82	20.21	16.88	0.00	0.00	14.63	40.74

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE												Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Wilmington, DE MD	4,220	57.16	1.53	0.59	14.54	8.53	51.24	44.29	32.69	46.59	17.70	15.56	16.40	17.19	18.55				
Limited Review:																			
Dover, DE MSA	1,194	16.17	0.00	0.00	5.30	2.76	82.64	85.68	12.06	11.56	22.73	0.00	20.51	23.13	20.59				
Sussex County, DE Non-Metro	1,969	26.67	0.00	0.00	0.00	0.00	90.18	73.18	9.82	26.82	20.24	0.00	0.00	19.65	22.02				

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: DELAWARE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Wilmington, DE MD	0	0.00	5.53	0.00	21.17	0.00	53.68	0.00	19.62	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Dover, DE MSA	0	0.00	0.00	0.00	12.38	0.00	66.39	0.00	21.24	0.00	0.00	0.00	0.00	0.00	0.00
Sussex County, DE Non-Metro	1	100.00	0.00	0.00	0.00	0.00	45.38	100.00	54.62	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Wilmington, DE MD	1,133	69.77	11.34	5.74	13.74	14.65	46.27	39.72	28.56	39.89	8.21	6.11	7.99	7.89	10.03
<b>Limited Review:</b>															
Dover, DE MSA	221	13.61	0.00	0.00	7.23	4.98	79.04	81.45	13.73	13.57	6.74	0.00	7.14	7.14	6.32
Sussex County, DE Non-Metro	270	16.63	0.00	0.00	0.00	0.00	84.97	85.56	15.03	14.44	4.55	0.00	0.00	4.97	4.40

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms		Geography: DELAWARE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Wilmington, DE MD	3	33.33	2.51	0.00	12.07	33.33	51.14	66.67	34.28	0.00	7.69	0.00	0.00	14.29	0.00
<b>Limited Review:</b>															
Dover, DE MSA	4	44.44	0.00	0.00	4.77	0.00	89.52	100.00	5.70	0.00	10.00	0.00	0.00	11.11	0.00
Sussex County, DE Non-Metro	2	22.22	0.00	0.00	0.00	0.00	96.11	100.00	3.89	0.00	5.00	0.00	0.00	5.56	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wilmington, DE MD	3,025	54.88	18.53	14.77	17.33	28.73	23.55	26.27	40.59	30.24	24.40	17.92	21.91	26.93	30.44
<b>Limited Review:</b>															
Dover, DE MSA	1,117	20.26	18.78	7.36	18.66	31.17	23.18	33.17	39.38	28.30	27.25	21.74	25.94	27.64	30.29
Sussex County, DE Non-Metro	1,370	24.85	18.14	5.55	19.53	15.52	23.99	16.64	38.34	62.29	23.35	28.85	27.45	22.39	22.09

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

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

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: DELAWARE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wilmington, DE MD	234	58.21	18.53	12.56	17.33	25.11	23.55	21.52	40.59	40.81	14.65	11.63	14.02	12.83	18.04
<b>Limited Review:</b>															
Dover, DE MSA	74	18.41	18.78	10.14	18.66	18.84	23.18	27.54	39.38	43.48	17.90	16.13	9.80	21.43	20.88
Sussex County, DE Non-Metro	94	23.38	18.14	2.35	19.53	14.12	23.99	24.71	38.34	58.82	15.22	0.00	10.00	17.39	21.01

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.2% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: DELAWARE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Wilmington, DE MD	4,220	57.16	18.53	6.37	17.33	18.80	23.55	27.44	40.59	47.39	20.03	14.38	18.55	19.94	21.88
<b>Limited Review:</b>															
Dover, DE MSA	1,194	16.17	18.78	5.58	18.66	18.27	23.18	27.76	39.38	48.40	21.74	19.83	21.72	21.39	22.20
Sussex County, DE Non-Metro	1,969	26.67	18.14	1.94	19.53	8.74	23.99	16.70	38.34	72.62	22.01	13.40	16.80	21.94	23.40

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 13.5% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: DELAWARE			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Wilmington, DE MD	1,135	69.80	66.23	59.38	93.48	3.96	2.56	8.21	12.20
<b>Limited Review:</b>									
Dover, DE MSA	221	13.59	65.99	57.01	87.78	6.33	5.88	6.74	9.56
Sussex County, DE Non-Metro	270	16.61	68.68	63.70	93.70	3.70	2.59	4.55	6.93

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 22.2% of small loans to businesses originated and purchased by the bank.

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

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: DELAWARE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Wilmington, DE MD	3	33.33	95.10	66.67	66.67	33.33	0.00	7.69	12.50	
Limited Review:										
Dover, DE MSA	4	44.44	98.01	100.00	100.00	0.00	0.00	10.00	16.67	
Sussex County, DE Non-Metro	2	22.22	97.67	100.00	100.00	0.00	0.00	5.00	8.33	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 11.1% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: DELAWARE		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Wilmington, DE MD	0	0	24	10,497	24	10,497	95.38	0	0
<b>Limited Review:</b>									
Dover, DE MSA	0	0	8	80	8	80	0.73	0	0
Sussex County, DE Non-Metro	0	0	2	20	2	20	0.18	0	0
<b>Statewide:</b>									
Delaware Statewide	1	8	1	400	2	408	3.71	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: DELAWARE								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Wilmington, DE MD	81.51	17	80.95	0.00	11.76	35.29	52.94	0	0	0	0	0	0	5.79	25.96	34.92	33.33
Limited Review:																	
Dover, DE MSA	7.08	2	9.52	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	12.17	73.74	14.09
Sussex County, DE Non-Metro	11.41	2	9.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.77	73.16	12.07

**Table 1. Lending Volume**

LENDING VOLUME		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:													
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	10.42	13,145	2,575,284	7,670	278,596	17	990	5	14,781	20,837	2,869,651	11.66	
Miami-Miami Beach-Kendall, FL MD	9.28	10,408	2,139,949	8,136	306,023	30	1,425	15	66,997	18,589	2,514,395	20.56	
Orlando-Kissimmee-Sanford, FL MSA	11.82	18,100	3,110,285	5,488	225,659	30	1,438	9	27,693	23,627	3,365,075	9.03	
Tampa-St. Petersburg-Clearwater, FL MSA	16.37	24,480	3,987,601	8,189	308,457	45	1,376	11	61,302	32,725	4,358,735	13.53	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	8.57	11,167	2,247,844	5,919	230,033	40	1,420	4	4,484	17,130	2,483,781	12.51	
Limited Review:													
Cape Coral-Fort Myers, FL MSA	4.01	5,955	942,859	2,043	63,137	9	570	1	9,412	8,008	1,015,978	2.90	
Citrus-Sumter, FL Non-Metro	0.84	1,355	204,799	326	11,252	5	78	0	0	1,686	216,129	0.38	
Crestview-Fort Walton Beach-Destin, FL MSA	1.29	2,247	424,253	317	14,671	5	56	0	0	2,569	438,980	0.37	
Deltona-Daytona Beach-Ormond Beach, FL MSA	2.56	3,442	446,969	1,673	52,280	5	89	0	0	5,120	499,338	2.42	
DeSoto-Highlands, FL Non-Metro	0.29	360	38,255	211	5,743	8	394	0	0	579	44,392	0.36	
Gainesville, FL MSA	1.29	1,946	310,959	624	24,949	5	136	1	4,461	2,576	340,506	1.12	
Jacksonville, FL MSA	9.22	14,560	2,557,312	3,844	160,046	30	1,790	0	0	18,434	2,719,147	7.99	
Lakeland-Winter Haven, FL MSA	2.39	3,702	463,346	1,065	43,566	15	727	0	0	4,782	507,639	1.47	
Madison-Taylor, FL Non-Metro	0.09	114	11,727	61	4,539	6	230	0	0	181	16,496	0.11	
Monroe County, FL Non-Metro	0.50	721	211,924	272	11,226	1	5	2	5,485	996	228,640	0.18	
Naples-Marco Island, FL MSA	2.26	3,271	784,530	1,245	43,902	5	65	1	1,574	4,522	830,070	1.99	
North Port-Bradenton-Sarasota, FL MSA	4.31	6,457	1,294,816	2,141	73,145	13	514	4	5,253	8,615	1,373,728	3.62	
Ocala, FL MSA	1.34	1,905	229,213	752	35,379	17	362	2	3,575	2,676	268,529	1.12	
Palm Bay-Melbourne-Titusville, FL MSA	3.74	5,532	804,980	1,936	85,640	10	368	1	100	7,479	891,087	2.43	
Palm Coast, FL MSA	0.62	1,059	148,534	185	5,789	0	0	0	0	1,244	154,323	0.41	
Panama City-Lynn Haven-Panama City Beach, FL MSA	0.67	1,074	184,990	266	11,810	0	0	1	3,300	1,341	200,100	0.24	
Panhandle FL Non-Metro	0.60	899	182,542	284	8,649	9	363	0	0	1,192	191,554	0.24	
Pensacola-Ferry Pass-Brent, FL MSA	2.03	3,468	551,705	590	25,063	7	109	1	2,160	4,066	579,037	0.78	
Port St Lucie, FL MSA	2.17	3,254	483,796	1,082	32,816	5	101	2	20,808	4,343	537,521	1.63	
Punta Gorda, FL MSA	0.92	1,315	179,910	512	13,502	2	59	1	500	1,830	193,971	0.93	
Sebastian-Vero Beach, FL MSA	0.82	1,117	175,352	522	19,132	3	750	0	0	1,642	195,234	1.07	
Tallahassee, FL MSA	1.58	2,709	435,817	453	21,412	0	0	1	550	3,163	457,779	0.95	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	7,233	9.99	1.16	1.40	23.67	13.09	45.93	46.00	29.24	39.51	20.75	21.55	19.20	21.70	20.27
Miami-Miami Beach-Kendall, FL MD	5,769	7.97	1.69	2.98	19.82	15.95	36.99	34.44	41.51	46.63	19.03	10.64	20.80	20.23	18.54
Orlando-Kissimmee-Sanford, FL MSA	9,883	13.65	0.62	0.10	17.95	12.18	49.89	49.25	31.54	38.47	19.70	10.26	20.65	18.92	20.51
Tampa-St. Petersburg-Clearwater, FL MSA	12,135	16.77	0.77	0.33	21.94	15.17	48.28	43.09	29.01	41.41	21.55	25.74	21.27	22.50	20.65
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,619	7.76	1.53	1.23	24.63	16.91	36.35	37.12	37.50	44.74	21.71	24.43	24.26	22.22	20.48
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	3,342	4.62	0.87	0.03	13.24	5.80	63.06	68.25	22.84	25.91	18.32	0.00	18.38	19.06	16.66
Citrus-Sumter, FL Non-Metro	529	0.73	0.00	0.00	0.00	0.00	76.87	78.64	23.13	21.36	9.22	0.00	0.00	8.73	11.67
Crestview-Fort Walton Beach-Destin, FL MSA	1,227	1.70	0.00	0.00	5.54	6.03	74.19	70.42	20.28	23.55	20.47	0.00	19.92	20.74	19.82
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,635	2.26	0.47	0.00	9.62	6.42	74.00	71.87	15.91	21.71	18.96	0.00	25.39	19.06	17.37
DeSoto-Highlands, FL Non-Metro	143	0.20	0.00	0.00	13.87	6.99	86.13	93.01	0.00	0.00	13.70	0.00	15.52	13.54	0.00
Gainesville, FL MSA	617	0.85	5.72	7.13	22.60	16.69	43.73	40.36	27.95	35.82	15.04	30.00	18.44	15.89	11.55
Jacksonville, FL MSA	6,628	9.16	1.98	0.06	16.44	10.73	54.98	54.65	26.60	34.57	20.75	2.47	22.35	20.11	21.60
Lakeland-Winter Haven, FL MSA	2,085	2.88	0.14	0.05	15.41	7.05	60.75	64.84	23.70	28.06	18.70	0.00	18.18	19.59	17.02
Madison-Taylor, FL Non-Metro	46	0.06	0.00	0.00	24.85	13.04	65.66	65.22	9.49	21.74	15.38	0.00	12.12	16.51	14.29
Monroe County, FL Non-Metro	292	0.40	0.00	0.00	0.00	0.00	20.25	18.49	79.75	81.51	14.66	0.00	0.00	17.51	14.14
Naples-Marco Island, FL MSA	1,635	2.26	2.30	0.49	13.08	12.05	47.98	50.28	36.65	37.19	17.58	17.39	15.27	16.89	19.56
North Port-Bradenton-Sarasota, FL MSA	3,013	4.16	0.30	0.17	20.46	8.30	54.68	53.87	24.56	37.67	18.59	33.33	16.29	17.65	20.76
Ocala, FL MSA	850	1.17	0.36	0.00	2.80	0.82	79.14	81.76	17.70	17.41	14.10	0.00	21.88	13.81	15.30
Palm Bay-Melbourne-Titusville, FL MSA	2,812	3.89	0.62	0.04	17.75	9.35	49.76	55.44	31.87	35.17	23.59	12.50	21.88	22.95	25.24
Palm Coast, FL MSA	468	0.65	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	21.57	0.00	0.00	21.57	0.00
Panama City-Lynn Haven-Panama City Beach, FL MSA	440	0.61	1.02	0.00	19.70	10.00	56.31	70.91	22.98	19.09	10.72	0.00	14.68	9.98	12.29
Panhandle FL Non-Metro	471	0.65	0.00	0.00	3.64	0.42	83.91	37.58	12.45	62.00	15.32	0.00	7.69	17.77	14.14
Pensacola-Ferry Pass-Brent, FL MSA	1,635	2.26	1.32	0.18	16.18	7.95	56.87	59.69	25.63	32.17	17.38	4.00	21.09	16.84	17.76
Port St Lucie, FL MSA	1,757	2.43	1.15	0.00	11.40	3.81	62.21	72.85	25.24	23.34	19.38	0.00	17.76	19.56	19.09
Punta Gorda, FL MSA	575	0.79	0.00	0.00	5.11	2.43	82.99	86.61	11.90	10.96	17.33	0.00	22.58	17.34	16.60
Sebastian-Vero Beach, FL MSA	521	0.72	0.00	0.00	13.47	9.21	61.60	63.92	24.93	26.87	19.57	0.00	23.74	18.97	19.64
Tallahassee, FL MSA	1,017	1.41	4.33	2.26	20.70	9.93	45.98	48.57	28.99	39.23	19.30	16.09	17.59	19.28	20.09

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	269	9.17	1.16	1.12	23.67	18.96	45.93	35.69	29.24	44.24	26.77	33.33	30.00	27.69	25.17
Miami-Miami Beach-Kendall, FL MD	280	9.54	1.69	2.14	19.82	15.71	36.99	34.29	41.51	47.86	29.20	15.38	28.57	27.98	31.20
Orlando-Kissimmee-Sanford, FL MSA	291	9.92	0.62	0.34	17.95	16.49	49.89	48.11	31.54	35.05	18.97	0.00	15.74	18.07	22.94
Tampa-St. Petersburg-Clearwater, FL MSA	491	16.73	0.77	0.20	21.94	19.76	48.28	48.88	29.01	31.16	18.20	14.29	18.27	20.00	15.68
West Palm Beach-Boca Raton-Boynton Beach, FL MD	201	6.85	1.53	2.99	24.63	20.40	36.35	28.86	37.50	47.76	26.24	15.38	36.51	30.00	22.03
Limited Review:															
Cape Coral-Fort Myers, FL MSA	98	3.34	0.87	0.00	13.24	13.27	63.06	64.29	22.84	22.45	25.00	0.00	20.59	28.08	21.15
Citrus-Sumter, FL Non-Metro	30	1.02	0.00	0.00	0.00	0.00	76.87	73.33	23.13	26.67	10.39	0.00	0.00	9.17	14.71
Crestview-Fort Walton Beach-Destin, FL MSA	26	0.89	0.00	0.00	5.54	0.00	74.19	80.77	20.28	19.23	13.74	0.00	0.00	14.94	17.24
Deltona-Daytona Beach-Ormond Beach, FL MSA	107	3.65	0.47	0.00	9.62	5.61	74.00	72.90	15.91	21.50	18.79	0.00	17.86	20.00	16.18
DeSoto-Highlands, FL Non-Metro	17	0.58	0.00	0.00	13.87	5.88	86.13	94.12	0.00	0.00	18.57	0.00	10.00	20.00	0.00
Gainesville, FL MSA	60	2.05	5.72	8.33	22.60	18.33	43.73	36.67	27.95	36.67	32.08	20.00	26.92	34.21	37.50
Jacksonville, FL MSA	306	10.43	1.98	1.63	16.44	10.78	54.98	54.58	26.60	33.01	15.75	41.67	12.80	15.00	17.26
Lakeland-Winter Haven, FL MSA	127	4.33	0.14	0.00	15.41	15.75	60.75	61.42	23.70	22.83	15.20	0.00	22.00	16.16	9.47
Madison-Taylor, FL Non-Metro	11	0.37	0.00	0.00	24.85	18.18	65.66	72.73	9.49	9.09	40.00	0.00	0.00	38.46	100.00
Monroe County, FL Non-Metro	12	0.41	0.00	0.00	0.00	0.00	20.25	41.67	79.75	58.33	19.23	0.00	0.00	25.00	18.18
Naples-Marco Island, FL MSA	47	1.60	2.30	0.00	13.08	8.51	47.98	48.94	36.65	42.55	25.51	0.00	15.38	26.00	29.41
North Port-Bradenton-Sarasota, FL MSA	99	3.37	0.30	1.01	20.46	15.15	54.68	50.51	24.56	33.33	18.77	0.00	12.96	17.54	25.00
Ocala, FL MSA	75	2.56	0.36	0.00	2.80	0.00	79.14	81.33	17.70	18.67	20.33	0.00	0.00	19.18	28.13
Palm Bay-Melbourne-Titusville, FL MSA	111	3.78	0.62	0.00	17.75	12.61	49.76	46.85	31.87	40.54	18.92	0.00	16.22	16.79	23.60
Palm Coast, FL MSA	26	0.89	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.43	0.00	0.00	13.43	0.00
Panama City-Lynn Haven-Panama City Beach, FL MSA	21	0.72	1.02	0.00	19.70	23.81	56.31	47.62	22.98	28.57	6.11	0.00	11.54	5.56	4.35
Panhandle FL Non-Metro	26	0.89	0.00	0.00	3.64	3.85	83.91	76.92	12.45	19.23	15.66	0.00	0.00	16.67	16.67
Pensacola-Ferry Pass-Brent, FL MSA	67	2.28	1.32	0.00	16.18	11.94	56.87	65.67	25.63	22.39	9.02	0.00	6.00	11.11	6.14
Port St Lucie, FL MSA	51	1.74	1.15	0.00	11.40	7.84	62.21	62.75	25.24	29.41	13.08	0.00	5.56	13.99	14.00
Punta Gorda, FL MSA	19	0.65	0.00	0.00	5.11	0.00	82.99	84.21	11.90	15.79	11.59	0.00	0.00	11.11	25.00
Sebastian-Vero Beach, FL MSA	20	0.68	0.00	0.00	13.47	15.00	61.60	45.00	24.93	40.00	20.55	0.00	33.33	13.33	31.82
Tallahassee, FL MSA	46	1.57	4.33	2.17	20.70	19.57	45.98	39.13	28.99	39.13	7.69	0.00	17.14	4.42	8.77

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	5,640	8.25	1.16	0.69	23.67	7.50	45.93	33.00	29.24	58.81	19.89	24.75	21.50	20.87	19.03
Miami-Miami Beach-Kendall, FL MD	4,315	6.31	1.69	0.42	19.82	8.00	36.99	26.16	41.51	65.42	18.28	10.64	17.80	20.34	17.60
Orlando-Kissimmee-Sanford, FL MSA	7,915	11.58	0.62	0.10	17.95	7.13	49.89	39.94	31.54	52.84	25.10	26.09	25.63	24.37	25.62
Tampa-St. Petersburg-Clearwater, FL MSA	11,847	17.33	0.77	0.15	21.94	9.05	48.28	37.57	29.01	53.23	25.01	25.00	25.37	25.62	24.50
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,345	7.82	1.53	0.30	24.63	7.95	36.35	30.59	37.50	61.16	19.88	16.88	22.86	19.72	19.62
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	2,515	3.68	0.87	0.04	13.24	6.40	63.06	49.98	22.84	43.58	24.99	50.00	32.38	25.48	23.83
Citrus-Sumter, FL Non-Metro	795	1.16	0.00	0.00	0.00	0.00	76.87	69.56	23.13	30.44	15.08	0.00	0.00	14.36	16.96
Crestview-Fort Walton Beach-Destin, FL MSA	994	1.45	0.00	0.00	5.54	4.73	74.19	69.92	20.28	25.35	18.13	0.00	19.16	18.60	16.86
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,699	2.49	0.47	0.12	9.62	4.65	74.00	62.74	15.91	32.49	24.16	50.00	29.44	23.97	23.76
DeSoto-Highlands, FL Non-Metro	200	0.29	0.00	0.00	13.87	11.00	86.13	89.00	0.00	0.00	21.89	0.00	33.33	20.94	0.00
Gainesville, FL MSA	1,269	1.86	5.72	1.65	22.60	12.06	43.73	38.46	27.95	47.83	25.58	19.67	26.05	24.60	26.67
Jacksonville, FL MSA	7,621	11.15	1.98	0.16	16.44	7.57	54.98	48.93	26.60	43.34	25.41	28.57	24.68	26.05	24.78
Lakeland-Winter Haven, FL MSA	1,490	2.18	0.14	0.00	15.41	5.70	60.75	52.28	23.70	42.01	24.18	0.00	25.11	22.41	26.68
Madison-Taylor, FL Non-Metro	57	0.08	0.00	0.00	24.85	22.81	65.66	57.89	9.49	19.30	24.06	0.00	29.17	18.48	47.06
Monroe County, FL Non-Metro	416	0.61	0.00	0.00	0.00	0.00	20.25	13.22	79.75	86.78	19.98	0.00	0.00	17.37	20.52
Naples-Marco Island, FL MSA	1,587	2.32	2.30	0.32	13.08	8.07	47.98	46.00	36.65	45.62	21.63	25.00	20.97	23.72	19.87
North Port-Bradenton-Sarasota, FL MSA	3,343	4.89	0.30	0.03	20.46	5.62	54.68	50.28	24.56	44.06	23.28	33.33	23.71	23.73	22.68
Ocala, FL MSA	979	1.43	0.36	0.00	2.80	1.84	79.14	75.59	17.70	22.57	22.40	0.00	40.74	22.15	22.38
Palm Bay-Melbourne-Titusville, FL MSA	2,609	3.82	0.62	0.00	17.75	7.70	49.76	44.50	31.87	47.80	24.73	0.00	29.16	24.53	24.28
Palm Coast, FL MSA	565	0.83	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	24.42	0.00	0.00	24.42	0.00
Panama City-Lynn Haven-Panama City Beach, FL MSA	613	0.90	1.02	0.16	19.70	9.14	56.31	68.03	22.98	22.68	15.24	0.00	15.70	16.43	12.11
Panhandle FL Non-Metro	402	0.59	0.00	0.00	3.64	0.50	83.91	49.75	12.45	49.75	15.61	0.00	5.00	15.50	16.02
Pensacola-Ferry Pass-Brent, FL MSA	1,764	2.58	1.32	0.11	16.18	5.61	56.87	60.20	25.63	34.07	16.88	12.50	13.98	17.69	15.98
Port St Lucie, FL MSA	1,446	2.12	1.15	0.07	11.40	2.77	62.21	61.62	25.24	35.55	22.23	0.00	15.32	23.33	20.87
Punta Gorda, FL MSA	721	1.05	0.00	0.00	5.11	1.25	82.99	76.70	11.90	22.05	22.46	0.00	37.50	21.29	26.30
Sebastian-Vero Beach, FL MSA	576	0.84	0.00	0.00	13.47	5.90	61.60	60.94	24.93	33.16	18.73	0.00	18.81	20.61	16.03
Tallahassee, FL MSA	1,646	2.41	4.33	1.40	20.70	5.04	45.98	40.52	28.99	53.04	20.24	17.19	15.67	19.57	21.59

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	3	6.52	2.27	0.00	32.48	0.00	48.64	66.67	16.61	33.33	1.67	0.00	0.00	4.17	0.00
Miami-Miami Beach-Kendall, FL MD	8	17.39	6.85	0.00	35.49	12.50	30.24	62.50	27.42	25.00	3.01	0.00	0.00	13.04	4.17
Orlando-Kissimmee-Sanford, FL MSA	11	23.91	2.41	0.00	30.42	18.18	49.93	45.45	17.23	36.36	12.90	0.00	0.00	21.05	0.00
Tampa-St. Petersburg-Clearwater, FL MSA	7	15.22	4.33	0.00	18.88	28.57	49.17	42.86	27.61	28.57	6.15	0.00	9.52	3.57	6.67
West Palm Beach-Boca Raton-Boynton Beach, FL MD	2	4.35	3.13	0.00	32.78	50.00	31.51	50.00	32.58	0.00	3.33	0.00	10.00	0.00	0.00
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	0	0.00	1.45	0.00	15.27	0.00	44.37	0.00	38.90	0.00	0.00	0.00	0.00	0.00	0.00
Citrus-Sumter, FL Non-Metro	1	2.17	0.00	0.00	0.00	0.00	72.69	100.00	27.31	0.00	0.00	0.00	0.00	0.00	0.00
Crestview-Fort Walton Beach-Destin, FL MSA	0	0.00	0.00	0.00	4.51	0.00	82.95	0.00	12.54	0.00	0.00	0.00	0.00	0.00	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA	1	2.17	1.77	0.00	26.94	0.00	60.83	0.00	10.46	100.00	0.00	0.00	0.00	0.00	0.00
DeSoto-Highlands, FL Non-Metro	0	0.00	0.00	0.00	15.60	0.00	84.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Gainesville, FL MSA	0	0.00	18.26	0.00	54.14	0.00	13.72	0.00	13.87	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville, FL MSA	5	10.87	5.03	0.00	21.26	60.00	52.80	40.00	20.92	0.00	4.35	0.00	20.00	0.00	0.00
Lakeland-Winter Haven, FL MSA	0	0.00	2.87	0.00	23.09	0.00	42.68	0.00	31.35	0.00	0.00	0.00	0.00	0.00	0.00
Madison-Taylor, FL Non-Metro	0	0.00	0.00	0.00	86.95	0.00	13.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Monroe County, FL Non-Metro	1	2.17	0.00	0.00	0.00	0.00	26.01	0.00	73.99	100.00	0.00	0.00	0.00	0.00	0.00
Naples-Marco Island, FL MSA	2	4.35	2.08	50.00	7.03	0.00	35.11	0.00	55.78	50.00	10.00	0.00	0.00	0.00	14.29
North Port-Bradenton-Sarasota, FL MSA	2	4.35	0.53	0.00	20.94	0.00	43.00	100.00	35.54	0.00	11.11	0.00	0.00	25.00	0.00
Ocala, FL MSA	1	2.17	3.42	0.00	19.52	100.00	45.14	0.00	31.92	0.00	0.00	0.00	0.00	0.00	0.00
Palm Bay-Melbourne-Titusville, FL MSA	0	0.00	2.10	0.00	26.13	0.00	53.00	0.00	18.77	0.00	0.00	0.00	0.00	0.00	0.00
Palm Coast, FL 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
Panama City-Lynn Haven-Panama City Beach, FL MSA	0	0.00	0.71	0.00	15.38	0.00	75.63	0.00	8.27	0.00	0.00	0.00	0.00	0.00	0.00
Panhandle FL Non-Metro	0	0.00	0.00	0.00	2.23	0.00	11.87	0.00	85.90	0.00	0.00	0.00	0.00	0.00	0.00
Pensacola-Ferry Pass-Brent, FL MSA	2	4.35	3.92	0.00	17.60	0.00	60.48	100.00	18.00	0.00	0.00	0.00	0.00	0.00	0.00
Port St Lucie, FL MSA	0	0.00	2.19	0.00	14.37	0.00	43.56	0.00	39.88	0.00	0.00	0.00	0.00	0.00	0.00
Punta Gorda, FL MSA	0	0.00	0.00	0.00	15.97	0.00	66.08	0.00	17.95	0.00	0.00	0.00	0.00	0.00	0.00
Sebastian-Vero Beach, FL MSA	0	0.00	0.00	0.00	18.93	0.00	45.98	0.00	35.08	0.00	0.00	0.00	0.00	0.00	0.00
Tallahassee, FL MSA	0	0.00	44.71	0.00	17.48	0.00	27.81	0.00	10.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	7,670	13.76	4.01	4.60	19.65	18.34	41.33	40.40	35.01	36.65	11.36	14.22	12.69	11.13	10.89
Miami-Miami Beach-Kendall, FL MD	8,066	14.47	3.98	3.60	19.56	16.70	32.37	29.05	43.51	50.66	8.28	10.90	7.86	7.97	8.50
Orlando-Kissimmee-Sanford, FL MSA	5,488	9.85	1.07	1.48	18.40	14.92	46.78	42.97	33.75	40.63	9.82	10.35	10.26	9.49	10.37
Tampa-St. Petersburg-Clearwater, FL MSA	8,189	14.69	1.41	1.64	21.26	19.77	42.74	43.73	34.58	34.86	10.95	11.16	11.06	11.48	10.58
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,911	10.61	2.78	3.64	19.29	19.51	34.19	32.46	43.62	44.39	10.90	13.46	13.82	10.57	10.10
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	2,043	3.67	0.63	0.64	12.13	11.75	60.60	56.58	26.64	31.03	12.08	10.29	13.76	11.88	12.72
Citrus-Sumter, FL Non-Metro	326	0.59	0.00	0.00	0.00	0.00	76.53	75.77	23.47	24.23	7.41	0.00	0.00	7.88	6.87
Crestview-Fort Walton Beach-Destin, FL MSA	317	0.57	0.00	0.00	7.73	14.83	66.82	60.57	25.45	24.61	6.11	0.00	12.46	5.70	5.13
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,673	3.00	0.71	1.49	14.11	15.18	65.77	65.27	19.40	18.05	15.28	18.57	19.22	15.48	12.73
DeSoto-Highlands, FL Non-Metro	211	0.38	0.00	0.00	14.91	22.27	85.09	77.73	0.00	0.00	11.49	0.00	16.02	11.23	0.00
Gainesville, FL MSA	624	1.12	7.48	8.17	27.25	31.57	36.55	28.04	28.72	32.21	12.27	20.67	13.97	11.72	10.86
Jacksonville, FL MSA	3,844	6.90	3.64	2.68	18.32	21.67	50.65	44.95	27.40	30.70	12.76	23.28	13.26	12.42	12.28
Lakeland-Winter Haven, FL MSA	1,065	1.91	0.26	0.09	17.10	23.29	58.73	55.49	23.90	21.13	13.62	11.11	17.60	14.54	10.42
Madison-Taylor, FL Non-Metro	61	0.11	0.00	0.00	30.56	39.34	57.71	52.46	11.73	8.20	15.61	0.00	15.32	20.31	11.11
Monroe County, FL Non-Metro	272	0.49	0.00	0.00	0.00	0.00	24.38	22.43	75.59	77.57	7.40	0.00	0.00	4.99	8.82
Naples-Marco Island, FL MSA	1,245	2.23	1.46	0.40	10.63	7.63	44.78	52.53	43.14	39.44	10.15	10.71	11.20	11.12	9.23
North Port-Bradenton-Sarasota, FL MSA	2,141	3.84	0.33	0.23	17.43	14.15	51.34	51.19	30.90	34.42	10.17	14.29	11.75	10.06	9.99
Ocala, FL MSA	752	1.35	0.54	0.53	3.74	3.99	73.97	67.82	21.75	27.66	11.36	6.67	11.46	11.51	11.90
Palm Bay-Melbourne-Titusville, FL MSA	1,936	3.47	0.82	1.03	19.86	22.21	46.97	38.12	32.35	38.64	14.86	14.77	17.13	13.15	16.21
Palm Coast, FL MSA	185	0.33	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.13	0.00	0.00	11.46	0.00
Panama City-Lynn Haven-Panama City Beach, FL MSA	266	0.48	0.63	0.38	22.57	26.69	54.62	49.25	22.17	23.68	5.48	10.00	7.29	4.84	5.62
Panhandle FL Non-Metro	284	0.51	0.00	0.00	3.49	2.11	58.85	56.69	37.66	41.20	8.06	0.00	25.53	9.36	6.56
Pensacola-Ferry Pass-Brent, FL MSA	590	1.06	2.22	3.73	19.48	20.51	52.04	43.56	26.27	32.20	6.25	13.94	5.70	5.71	6.88
Port St Lucie, FL MSA	1,082	1.94	1.99	0.92	16.05	16.54	59.41	53.05	22.54	29.48	11.14	21.59	10.48	10.53	12.79
Punta Gorda, FL MSA	512	0.92	0.00	0.00	3.93	2.34	85.99	89.45	10.08	8.20	11.48	0.00	4.35	12.52	7.45
Sebastian-Vero Beach, FL MSA	522	0.94	0.00	0.00	11.49	16.48	60.55	53.26	27.96	30.27	13.00	0.00	24.51	11.97	11.00
Tallahassee, FL MSA	453	0.81	8.46	5.74	16.58	14.13	46.35	40.84	28.35	39.29	5.58	4.68	4.23	5.46	6.97

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: FLORIDA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	17	5.28	3.30	0.00	21.23	5.88	42.51	29.41	32.96	64.71	36.67	0.00	33.33	40.00	40.00
Miami-Miami Beach-Kendall, FL MD	30	9.32	2.39	0.00	18.13	13.33	35.10	13.33	44.19	73.33	37.29	100.00	80.00	25.00	33.33
Orlando-Kissimmee-Sanford, FL MSA	30	9.32	0.85	0.00	17.54	3.33	55.52	76.67	26.08	20.00	27.14	0.00	16.67	31.82	23.53
Tampa-St. Petersburg-Clearwater, FL MSA	45	13.98	0.59	0.00	23.12	13.33	48.74	53.33	27.55	33.33	26.09	0.00	23.08	30.19	23.91
West Palm Beach-Boca Raton-Boynton Beach, FL MD	40	12.42	2.82	2.50	23.02	5.00	34.77	20.00	39.38	72.50	45.45	66.67	33.33	34.78	52.78
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	9	2.80	0.55	0.00	10.58	0.00	71.57	22.22	17.29	77.78	20.83	0.00	0.00	5.88	66.67
Citrus-Sumter, FL Non-Metro	5	1.55	0.00	0.00	0.00	0.00	82.08	60.00	17.92	40.00	16.67	0.00	0.00	12.50	50.00
Crestview-Fort Walton Beach-Destin, FL MSA	5	1.55	0.00	0.00	8.70	40.00	74.91	40.00	16.38	20.00	50.00	0.00	100.00	50.00	0.00
Deltona-Daytona Beach-Ormond Beach, FL MSA	5	1.55	0.46	0.00	9.27	0.00	72.49	60.00	17.78	40.00	21.05	0.00	0.00	20.00	25.00
DeSoto-Highlands, FL Non-Metro	8	2.48	0.00	0.00	9.41	0.00	90.59	100.00	0.00	0.00	21.88	0.00	0.00	24.14	0.00
Gainesville, FL MSA	5	1.55	2.80	0.00	26.71	20.00	54.29	80.00	16.20	0.00	3.75	0.00	0.00	6.52	0.00
Jacksonville, FL MSA	30	9.32	1.51	13.33	15.57	6.67	60.48	63.33	22.44	16.67	50.00	100.00	50.00	50.00	44.44
Lakeland-Winter Haven, FL MSA	15	4.66	0.00	0.00	14.69	6.67	63.19	80.00	22.12	13.33	37.84	0.00	44.44	44.44	25.00
Madison-Taylor, FL Non-Metro	6	1.86	0.00	0.00	18.75	16.67	77.88	50.00	3.37	33.33	50.00	0.00	100.00	33.33	100.00
Monroe County, FL Non-Metro	1	0.31	0.00	0.00	0.00	0.00	18.15	0.00	81.85	100.00	0.00	0.00	0.00	0.00	0.00
Naples-Marco Island, FL MSA	5	1.55	3.98	20.00	19.27	20.00	52.42	20.00	24.32	40.00	23.53	33.33	20.00	25.00	20.00
North Port-Bradenton-Sarasota, FL MSA	13	4.04	0.31	0.00	16.79	15.38	56.01	30.77	26.89	53.85	17.65	0.00	16.67	18.18	20.00
Ocala, FL MSA	17	5.28	0.16	0.00	1.41	0.00	83.86	94.12	14.57	5.88	21.82	0.00	0.00	26.67	0.00
Palm Bay-Melbourne-Titusville, FL MSA	10	3.11	1.07	0.00	17.84	0.00	53.53	20.00	27.56	80.00	53.85	0.00	100.00	33.33	62.50
Palm Coast, FL 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
Panama City-Lynn Haven-Panama City Beach, FL MSA	0	0.00	0.37	0.00	22.82	0.00	54.17	0.00	22.63	0.00	0.00	0.00	0.00	0.00	0.00
Panhandle FL Non-Metro	9	2.80	0.00	0.00	1.99	0.00	86.00	100.00	12.02	0.00	9.84	0.00	0.00	10.34	0.00
Pensacola-Ferry Pass-Brent, FL MSA	7	2.17	1.33	0.00	15.10	14.29	59.89	71.43	23.69	14.29	20.83	0.00	0.00	22.22	25.00
Port St Lucie, FL MSA	5	1.55	1.70	0.00	17.98	0.00	60.45	100.00	19.87	0.00	18.52	0.00	0.00	28.57	12.50
Punta Gorda, FL MSA	2	0.62	0.00	0.00	3.26	0.00	91.91	100.00	4.83	0.00	20.00	0.00	0.00	20.00	0.00
Sebastian-Vero Beach, FL MSA	3	0.93	0.00	0.00	14.14	33.33	65.64	66.67	20.22	0.00	20.00	0.00	0.00	25.00	0.00
Tallahassee, FL MSA	0	0.00	4.33	0.00	18.51	0.00	51.19	0.00	25.98	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE		Geography: FLORIDA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	7,233	9.99	20.85	7.35	18.17	23.44	20.48	23.53	40.50	45.69	21.79	20.57	22.57	21.42	21.77
Miami-Miami Beach-Kendall, FL MD	5,789	8.00	23.00	4.25	16.98	19.19	18.53	25.83	41.50	50.73	20.11	24.77	22.28	21.44	18.50
Orlando-Kissimmee-Sanford, FL MSA	9,883	13.65	18.74	9.83	18.84	23.72	22.70	23.62	39.72	42.83	20.85	21.15	20.13	20.89	21.16
Tampa-St. Petersburg-Clearwater, FL MSA	12,135	16.76	18.87	8.21	19.12	22.14	22.01	22.55	40.01	47.10	21.77	22.44	21.60	21.36	21.96
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,619	7.76	19.86	9.75	18.56	21.79	20.60	22.25	40.98	46.21	22.81	27.44	23.82	23.29	21.54
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	3,342	4.62	17.16	10.84	19.96	18.85	23.32	19.37	39.56	50.95	19.41	20.09	17.47	20.74	19.46
Citrus-Sumter, FL Non-Metro	529	0.73	16.68	5.05	20.52	11.72	24.03	23.43	38.78	59.80	8.89	15.05	9.32	11.47	7.88
Crestview-Fort Walton Beach-Destin, FL MSA	1,227	1.69	17.10	5.24	20.02	22.15	24.36	31.93	38.52	40.69	22.25	14.71	23.36	24.01	21.49
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,635	2.26	17.44	12.83	19.60	23.94	23.44	23.47	39.51	39.76	19.37	21.29	19.18	19.40	18.85
DeSoto-Highlands, FL Non-Metro	143	0.20	18.77	6.03	20.17	21.55	24.41	25.86	36.65	46.55	12.85	12.50	10.91	13.04	14.22
Gainesville, FL MSA	617	0.85	23.59	7.07	16.37	18.66	19.54	25.00	40.51	49.28	15.27	15.08	13.18	16.42	15.48
Jacksonville, FL MSA	6,628	9.16	19.42	10.83	18.51	24.79	23.14	25.42	38.94	38.95	20.28	18.19	18.07	20.91	22.24
Lakeland-Winter Haven, FL MSA	2,085	2.88	18.23	9.08	19.44	28.01	22.60	24.23	39.73	38.68	18.40	18.02	18.13	16.76	19.89
Madison-Taylor, FL Non-Metro	46	0.06	24.89	0.00	18.64	23.81	19.96	33.33	36.51	42.86	14.60	0.00	22.22	14.29	12.12
Monroe County, FL Non-Metro	292	0.40	12.67	0.00	12.51	0.71	17.41	9.57	57.40	89.72	16.56	0.00	0.00	17.11	16.78
Naples-Marco Island, FL MSA	1,635	2.26	19.06	9.51	19.32	14.27	20.65	17.54	40.97	58.68	18.55	12.86	16.87	20.03	20.03
North Port-Bradenton-Sarasota, FL MSA	3,013	4.16	17.71	6.34	19.64	16.38	23.60	21.10	39.06	56.18	19.59	13.37	17.65	20.26	20.87
Ocala, FL MSA	850	1.17	17.12	11.10	19.85	24.70	23.46	24.83	39.56	39.37	14.10	14.43	11.65	13.49	16.50
Palm Bay-Melbourne-Titusville, FL MSA	2,812	3.88	18.27	12.20	19.30	22.26	22.67	20.93	39.76	44.61	24.75	24.17	23.11	23.51	26.31
Palm Coast, FL MSA	468	0.65	17.10	7.86	20.20	23.10	23.28	22.86	39.41	46.19	21.57	21.50	20.22	20.49	22.87
Panama City-Lynn Haven-Panama City Beach, FL MSA	440	0.61	19.46	6.38	18.07	16.33	22.04	19.64	40.43	57.65	10.66	12.14	7.94	9.35	12.11
Panhandle FL Non-Metro	471	0.65	21.31	1.80	18.60	6.76	21.49	15.09	38.59	76.35	15.85	11.76	10.24	14.59	17.10
Pensacola-Ferry Pass-Brent, FL MSA	1,635	2.26	20.39	7.41	17.84	17.87	22.05	29.63	39.73	45.09	19.02	14.38	16.70	20.12	20.39
Port St Lucie, FL MSA	1,757	2.43	18.46	11.62	19.34	21.08	22.19	25.88	40.01	41.43	20.81	25.77	19.22	21.94	19.90
Punta Gorda, FL MSA	575	0.79	15.59	10.07	20.59	21.25	25.42	20.70	38.40	47.99	18.13	23.36	21.92	16.58	16.70
Sebastian-Vero Beach, FL MSA	521	0.72	17.61	11.97	19.63	20.28	22.39	22.11	40.37	45.64	21.21	26.17	20.29	24.54	19.58
Tallahassee, FL MSA	1,017	1.40	22.19	11.41	16.53	24.61	21.68	25.34	39.60	38.64	20.99	23.65	21.72	21.18	19.78

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 7.6% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: FLORIDA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	269	9.17	20.85	16.60	18.17	17.39	20.48	22.13	40.50	43.87	26.32	19.15	23.76	25.58	29.02
Miami-Miami Beach-Kendall, FL MD	280	9.54	23.00	8.40	16.98	18.32	18.53	19.47	41.50	53.82	30.40	19.64	34.18	34.95	29.82
Orlando-Kissimmee-Sanford, FL MSA	291	9.92	18.74	17.74	18.84	21.89	22.70	20.38	39.72	40.00	17.63	19.23	17.03	14.63	19.13
Tampa-St. Petersburg-Clearwater, FL MSA	491	16.73	18.87	15.62	19.12	25.60	22.01	23.21	40.01	35.57	17.25	18.91	19.43	16.06	16.18
West Palm Beach-Boca Raton-Boynton Beach, FL MD	201	6.85	19.86	12.11	18.56	20.00	20.60	22.63	40.98	45.26	26.05	32.43	29.11	26.09	23.59
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	98	3.34	17.16	14.13	19.96	29.35	23.32	20.65	39.56	35.87	24.89	23.08	30.91	19.30	25.29
Citrus-Sumter, FL Non-Metro	30	1.02	16.68	3.33	20.52	26.67	24.03	23.33	38.78	46.67	10.88	5.56	11.76	12.50	11.11
Crestview-Fort Walton Beach-Destin, FL MSA	26	0.89	17.10	16.67	20.02	16.67	24.36	33.33	38.52	33.33	13.11	11.76	10.53	16.67	12.50
Deltona-Daytona Beach-Ormond Beach, FL MSA	107	3.65	17.44	20.75	19.60	25.47	23.44	26.42	39.51	27.36	18.91	16.98	14.94	22.41	22.08
DeSoto-Highlands, FL Non-Metro	17	0.58	18.77	11.76	20.17	29.41	24.41	17.65	36.65	41.18	19.40	7.69	16.00	27.27	27.78
Gainesville, FL MSA	60	2.05	23.59	7.02	16.37	17.54	19.54	17.54	40.51	57.89	34.44	20.00	35.29	17.39	44.44
Jacksonville, FL MSA	306	10.43	19.42	17.01	18.51	22.45	23.14	23.47	38.94	37.07	15.45	20.19	15.07	13.17	15.85
Lakeland-Winter Haven, FL MSA	127	4.33	18.23	15.38	19.44	32.48	22.60	27.35	39.73	24.79	13.37	11.32	14.41	16.44	11.30
Madison-Taylor, FL Non-Metro	11	0.37	24.89	0.00	18.64	9.09	19.96	27.27	36.51	63.64	40.00	0.00	25.00	40.00	50.00
Monroe County, FL Non-Metro	12	0.41	12.67	8.33	12.51	0.00	17.41	8.33	57.40	83.33	19.23	0.00	0.00	0.00	26.32
Naples-Marco Island, FL MSA	47	1.60	19.06	16.28	19.32	18.60	20.65	23.26	40.97	41.86	26.67	37.50	35.29	20.00	25.00
North Port-Bradenton-Sarasota, FL MSA	99	3.37	17.71	7.61	19.64	20.65	23.60	16.30	39.06	55.43	17.85	4.35	11.76	18.52	27.68
Ocala, FL MSA	75	2.56	17.12	16.44	19.85	19.18	23.46	24.66	39.56	39.73	20.00	15.00	10.81	22.58	26.87
Palm Bay-Melbourne-Titusville, FL MSA	111	3.78	18.27	14.95	19.30	17.76	22.67	21.50	39.76	45.79	17.93	14.58	10.34	16.28	24.51
Palm Coast, FL MSA	26	0.89	17.10	28.00	20.20	4.00	23.28	24.00	39.41	44.00	12.70	20.00	3.57	20.00	20.00
Panama City-Lynn Haven-Panama City Beach, FL MSA	21	0.72	19.46	9.52	18.07	14.29	22.04	23.81	40.43	52.38	6.32	0.00	5.71	6.52	9.09
Panhandle FL Non-Metro	26	0.89	21.31	15.38	18.60	11.54	21.49	15.38	38.59	57.69	16.05	33.33	6.25	11.11	19.51
Pensacola-Ferry Pass-Brent, FL MSA	67	2.28	20.39	11.11	17.84	19.05	22.05	19.05	39.73	50.79	8.97	6.06	9.52	7.22	10.29
Port St Lucie, FL MSA	51	1.74	18.46	14.00	19.34	18.00	22.19	24.00	40.01	44.00	13.37	19.05	16.33	14.29	9.21
Punta Gorda, FL MSA	19	0.65	15.59	10.53	20.59	15.79	25.42	36.84	38.40	36.84	11.76	15.38	9.09	13.04	9.52
Sebastian-Vero Beach, FL MSA	20	0.68	17.61	5.26	19.63	21.05	22.39	15.79	40.37	57.89	19.72	14.29	14.29	12.50	26.47
Tallahassee, FL MSA	46	1.57	22.19	4.44	16.53	24.44	21.68	26.67	39.60	44.44	7.69	2.38	6.45	10.45	8.99

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.5% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	5,640	8.25	20.85	2.96	18.17	9.38	20.48	18.89	40.50	68.77	23.94	13.76	21.35	26.36	24.38
Miami-Miami Beach-Kendall, FL MD	4,331	6.33	23.00	2.55	16.98	5.63	18.53	14.85	41.50	76.97	21.63	13.01	15.67	23.82	22.38
Orlando-Kissimmee-Sanford, FL MSA	7,915	11.57	18.74	4.44	18.84	12.31	22.70	19.71	39.72	63.54	28.94	23.63	28.39	27.99	29.88
Tampa-St. Petersburg-Clearwater, FL MSA	11,847	17.32	18.87	4.33	19.12	12.17	22.01	19.45	40.01	64.05	26.74	21.13	25.31	25.97	27.66
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,345	7.82	19.86	3.22	18.56	10.84	20.60	19.30	40.98	66.65	23.83	14.00	19.87	25.50	24.90
<b>Limited Review:</b>															
Cape Coral-Fort Myers, FL MSA	2,515	3.68	17.16	4.41	19.96	10.98	23.32	19.36	39.56	65.26	27.75	27.05	26.62	31.51	26.95
Citrus-Sumter, FL Non-Metro	795	1.16	16.68	2.55	20.52	12.31	24.03	22.77	38.78	62.38	16.03	8.70	17.92	15.04	16.53
Crestview-Fort Walton Beach-Destin, FL MSA	994	1.45	17.10	7.03	20.02	14.65	24.36	23.47	38.52	54.86	17.48	16.67	17.01	17.32	17.79
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,699	2.48	17.44	6.92	19.60	16.78	23.44	24.38	39.51	51.92	26.31	24.55	23.57	30.07	25.92
DeSoto-Highlands, FL Non-Metro	200	0.29	18.77	3.09	20.17	19.14	24.41	27.78	36.65	50.00	24.50	21.43	23.64	28.40	23.35
Gainesville, FL MSA	1,269	1.86	23.59	3.54	16.37	11.66	19.54	19.43	40.51	65.37	28.59	19.74	25.11	27.52	30.01
Jacksonville, FL MSA	7,621	11.14	19.42	5.65	18.51	14.41	23.14	21.21	38.94	58.73	26.12	23.09	23.56	24.93	27.81
Lakeland-Winter Haven, FL MSA	1,490	2.18	18.23	3.41	19.44	13.97	22.60	21.20	39.73	61.43	24.63	18.25	21.98	22.95	26.73
Madison-Taylor, FL Non-Metro	57	0.08	24.89	4.08	18.64	10.20	19.96	22.45	36.51	63.27	26.21	0.00	30.00	21.43	30.51
Monroe County, FL Non-Metro	416	0.61	12.67	0.76	12.51	3.80	17.41	6.84	57.40	88.61	23.89	27.27	28.13	18.33	24.09
Naples-Marco Island, FL MSA	1,587	2.32	19.06	4.72	19.32	11.39	20.65	21.70	40.97	62.20	23.63	25.13	24.15	28.78	21.89
North Port-Bradenton-Sarasota, FL MSA	3,343	4.89	17.71	4.73	19.64	11.77	23.60	19.78	39.06	63.72	25.86	24.44	23.80	24.15	26.98
Ocala, FL MSA	979	1.43	17.12	4.81	19.85	16.71	23.46	26.80	39.56	51.68	24.88	23.89	25.58	25.63	24.42
Palm Bay-Melbourne-Titusville, FL MSA	2,609	3.82	18.27	5.83	19.30	15.36	22.67	20.28	39.76	58.52	27.48	20.20	24.43	29.72	28.41
Palm Coast, FL MSA	565	0.83	17.10	6.26	20.20	16.16	23.28	32.32	39.41	45.25	26.33	21.43	27.92	31.25	24.01
Panama City-Lynn Haven-Panama City Beach, FL MSA	613	0.90	19.46	4.21	18.07	12.38	22.04	21.73	40.43	61.68	13.67	20.00	9.23	11.73	14.86
Panhandle FL Non-Metro	402	0.59	21.31	1.43	18.60	5.73	21.49	18.05	38.59	74.79	16.71	8.33	5.62	18.45	17.69
Pensacola-Ferry Pass-Brent, FL MSA	1,764	2.58	20.39	5.88	17.84	15.27	22.05	22.37	39.73	56.49	18.11	13.73	19.53	16.80	18.79
Port St Lucie, FL MSA	1,446	2.11	18.46	4.05	19.34	12.31	22.19	20.89	40.01	62.74	26.48	18.52	23.14	29.45	27.11
Punta Gorda, FL MSA	721	1.05	15.59	7.38	20.59	14.62	25.42	22.77	38.40	55.23	25.65	26.88	22.37	22.98	27.81
Sebastian-Vero Beach, FL MSA	576	0.84	17.61	5.12	19.63	13.66	22.39	19.92	40.37	61.29	22.65	12.96	26.95	24.04	22.13
Tallahassee, FL MSA	1,646	2.41	22.19	4.64	16.53	13.99	21.68	23.41	39.60	57.96	22.55	23.56	20.04	19.98	24.40

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 13.9% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: FLORIDA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	7,670	13.74	70.49	59.07	95.48	2.52	2.01	11.36	15.40
Miami-Miami Beach-Kendall, FL MD	8,136	14.58	69.18	58.24	95.30	2.90	1.79	8.28	11.50
Orlando-Kissimmee-Sanford, FL MSA	5,488	9.83	70.85	57.40	94.30	3.35	2.35	9.82	13.66
Tampa-St. Petersburg-Clearwater, FL MSA	8,189	14.67	68.28	60.64	94.60	3.47	1.93	10.95	16.25
West Palm Beach-Boca Raton-Boynton Beach, FL MD	5,919	10.61	70.34	59.39	94.27	3.51	2.21	10.90	15.27
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA	2,043	3.66	71.76	60.94	96.04	2.45	1.52	12.08	17.69
Citrus-Sumter, FL Non-Metro	326	0.58	71.62	68.40	95.40	3.07	1.53	7.41	12.99
Crestview-Fort Walton Beach-Destin, FL MSA	317	0.57	72.02	66.88	91.17	5.99	2.84	6.11	10.84
Deltona-Daytona Beach-Ormond Beach, FL MSA	1,673	3.00	71.11	62.04	96.11	2.75	1.14	15.28	21.07
DeSoto-Highlands, FL Non-Metro	211	0.38	43.58	64.93	98.10	1.42	0.47	11.49	17.60
Gainesville, FL MSA	624	1.12	68.20	60.26	93.75	4.33	1.92	12.27	16.33
Jacksonville, FL MSA	3,844	6.89	69.71	56.04	94.07	3.72	2.21	12.76	17.53
Lakeland-Winter Haven, FL MSA	1,065	1.91	72.96	50.42	95.21	2.63	2.16	13.62	16.53
Madison-Taylor, FL Non-Metro	61	0.11	69.60	54.10	90.16	1.64	8.20	15.61	27.19
Monroe County, FL Non-Metro	272	0.49	69.03	71.69	93.75	4.04	2.21	7.40	11.63
Naples-Marco Island, FL MSA	1,245	2.23	70.10	60.08	96.06	2.09	1.85	10.15	15.83
North Port-Bradenton-Sarasota, FL MSA	2,141	3.84	72.14	62.63	96.22	2.24	1.54	10.17	15.26
Ocala, FL MSA	752	1.35	73.16	60.64	92.02	4.92	3.06	11.36	18.14
Palm Bay-Melbourne-Titusville, FL MSA	1,936	3.47	64.34	54.44	92.82	4.44	2.74	14.86	19.88
Palm Coast, FL MSA	185	0.33	73.00	65.41	95.68	2.16	2.16	11.13	16.02
Panama City-Lynn Haven-Panama City Beach, FL MSA	266	0.48	68.94	63.91	92.48	5.64	1.88	5.48	9.07
Panhandle FL Non-Metro	284	0.51	71.23	65.49	96.48	1.06	2.46	8.06	14.86
Pensacola-Ferry Pass-Brent, FL MSA	590	1.06	72.67	63.05	94.07	3.39	2.54	6.25	10.23
Port St Lucie, FL MSA	1,082	1.94	72.16	63.31	96.95	2.13	0.92	11.14	15.47
Punta Gorda, FL MSA	512	0.92	73.05	61.52	96.48	2.54	0.98	11.48	17.39
Sebastian-Vero Beach, FL MSA	522	0.94	53.40	56.70	94.83	2.68	2.49	13.00	18.31
Tallahassee, FL MSA	453	0.81	70.11	59.82	94.04	2.87	3.09	5.58	7.82

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 23.8% of small loans to businesses originated and purchased by the bank.

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

Borrower Distribution: SMALL LOANS TO FARMS			Geography: FLORIDA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	17	5.28	97.37	47.06	94.12	0.00	5.88	36.67	35.29	
Miami-Miami Beach-Kendall, FL MD	30	9.32	96.88	70.00	96.67	3.33	0.00	37.29	61.54	
Orlando-Kissimmee-Sanford, FL MSA	30	9.32	96.74	63.33	90.00	3.33	6.67	27.14	30.00	
Tampa-St. Petersburg-Clearwater, FL MSA	45	13.98	97.27	71.11	97.78	2.22	0.00	26.09	36.07	
West Palm Beach-Boca Raton-Boynton Beach, FL MD	40	12.42	96.20	80.00	97.50	0.00	2.50	45.45	52.17	
<b>Limited Review:</b>										
Cape Coral-Fort Myers, FL MSA	9	2.80	97.59	33.33	88.89	0.00	11.11	20.83	7.69	
Citrus-Sumter, FL Non-Metro	5	1.55	98.55	100.00	100.00	0.00	0.00	16.67	23.08	
Crestview-Fort Walton Beach-Destin, FL MSA	5	1.55	97.61	40.00	100.00	0.00	0.00	50.00	50.00	
Deltona-Daytona Beach-Ormond Beach, FL MSA	5	1.55	98.44	60.00	100.00	0.00	0.00	21.05	16.67	
DeSoto-Highlands, FL Non-Metro	8	2.48	92.94	37.50	100.00	0.00	0.00	21.88	20.00	
Gainesville, FL MSA	5	1.55	96.15	40.00	100.00	0.00	0.00	3.75	4.26	
Jacksonville, FL MSA	30	9.32	97.38	60.00	83.33	16.67	0.00	50.00	62.50	
Lakeland-Winter Haven, FL MSA	15	4.66	96.37	80.00	93.33	0.00	6.67	37.84	47.83	
Madison-Taylor, FL Non-Metro	6	1.86	97.12	83.33	100.00	0.00	0.00	50.00	57.14	
Monroe County, FL Non-Metro	1	0.31	97.92	100.00	100.00	0.00	0.00	0.00	0.00	
Naples-Marco Island, FL MSA	5	1.55	94.81	80.00	100.00	0.00	0.00	23.53	30.00	
North Port-Bradenton-Sarasota, FL MSA	13	4.04	96.57	76.92	92.31	0.00	7.69	17.65	35.71	
Ocala, FL MSA	17	5.28	98.07	70.59	100.00	0.00	0.00	21.82	26.32	
Palm Bay-Melbourne-Titusville, FL MSA	10	3.11	98.14	90.00	90.00	10.00	0.00	53.85	75.00	
Palm Coast, FL MSA	0	0.00	97.62	0.00	0.00	0.00	0.00	0.00	0.00	
Panama City-Lynn Haven-Panama City Beach, FL MSA	0	0.00	98.89	0.00	0.00	0.00	0.00	0.00	0.00	
Panhandle FL Non-Metro	9	2.80	98.11	66.67	100.00	0.00	0.00	9.84	11.63	
Pensacola-Ferry Pass-Brent, FL MSA	7	2.17	98.48	100.00	100.00	0.00	0.00	20.83	50.00	
Port St Lucie, FL MSA	5	1.55	95.30	80.00	100.00	0.00	0.00	18.52	30.77	
Punta Gorda, FL MSA	2	0.62	98.31	100.00	100.00	0.00	0.00	20.00	25.00	
Sebastian-Vero Beach, FL MSA	3	0.93	94.25	33.33	33.33	0.00	66.67	20.00	33.33	
Tallahassee, FL MSA	0	0.00	97.91	0.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2011).

\*\*\*\* 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 14.3% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: FLORIDA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	4	16,949	57	31,885	61	48,834	11.93	0	0
Miami-Miami Beach-Kendall, FL MD	8	76,115	78	117,843	86	193,959	47.37	0	0
Orlando-Kissimmee-Sanford, FL MSA	2	424	98	22,919	100	23,342	5.70	0	0
Tampa-St. Petersburg-Clearwater, FL MSA	4	2,503	128	33,562	132	36,064	8.81	0	0
West Palm Beach-Boca Raton-Boynton Beach, FL MD	1	9,385	87	18,219	88	27,604	6.74	0	0
<b>Limited Review:</b>									
Cape Coral-Fort Myers, FL MSA	0	0	24	235	24	235	0.06	0	0
Citrus-Sumter, FL Non-Metro	0	0	0	0	0	0	0.00	0	0
Crestview-Fort Walton Beach-Destin, FL MSA	0	0	2	9	2	9	0.00	0	0
Deltona-Daytona Beach-Ormond Beach, FL MSA	0	0	11	76	11	76	0.02	0	0
DeSoto-Highlands, FL Non-Metro	0	0	1	1	1	1	0.00	0	0
Gainesville, FL MSA	0	0	15	107	15	107	0.03	0	0
Jacksonville, FL MSA	1	708	89	7,960	90	8,669	2.12	0	0
Lakeland-Winter Haven, FL MSA	2	13,270	13	687	15	13,956	3.41	0	0
Madison-Taylor, FL Non-Metro	0	0	2	1	2	1	0.00	0	0
Monroe County, FL Non-Metro	2	12,216	5	21,729	7	33,945	8.29	0	0
Naples-Marco Island, FL MSA	0	0	16	618	16	618	0.15	0	0
North Port-Bradenton-Sarasota, FL MSA	2	1,127	27	263	29	1,390	0.34	0	0
Ocala, FL MSA	2	5,792	14	74	16	5,865	1.43	0	0
Palm Bay-Melbourne-Titusville, FL MSA	1	994	20	170	21	1,164	0.28	0	0
Palm Coast, FL MSA	0	0	5	18	5	18	0.00	0	0
Panama City-Lynn Haven-Panama City Beach, FL MSA	1	739	3	8,243	4	8,982	2.19	0	0
Panhandle FL Non-Metro	0	0	3	13	3	13	0.00	0	0
Pensacola-Ferry Pass-Brent, FL MSA	0	0	13	127	13	127	0.03	0	0
Port St Lucie, FL MSA	0	0	10	68	10	68	0.02	0	0
Punta Gorda, FL MSA	0	0	5	30	5	30	0.01	0	0
Sebastian-Vero Beach, FL MSA	0	0	5	25	5	25	0.01	0	0
Tallahassee, FL MSA	2	3,242	21	348	23	3,590	0.88	0	0
<b>Statewide:</b>									
Florida Statewide	0	0	2	750	2	750	0.18	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: FLORIDA				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD	11.66	74	11.49	2.70	31.08	31.08	35.14	5	6	0	0	0	-1	4.13	28.90	35.76	31.21		
Miami-Miami Beach-Kendall, FL MD	20.56	60	9.32	1.67	23.33	25.00	50.00	1	5	0	-2	0	-2	5.06	26.89	34.46	33.01		
Orlando-Kissimmee-Sanford, FL MSA	9.03	55	8.54	1.82	27.27	32.73	38.18	0	1	0	-1	0	0	1.09	26.67	41.33	30.90		
Tampa-St. Petersburg-Clearwater, FL MSA	13.53	87	13.51	4.60	22.99	39.08	33.33	2	10	0	-1	-3	-4	3.63	25.12	41.40	29.66		
West Palm Beach-Boca Raton-Boynton Beach, FL MD	12.51	64	9.94	6.25	29.69	28.13	35.94	2	10	-1	-2	-1	-4	4.88	26.01	33.30	35.59		
Limited Review:																			
Cape Coral-Fort Myers, FL MSA	2.90	34	5.28	2.94	20.59	44.12	32.35	0	2	0	-1	0	-1	3.49	19.26	52.98	24.27		
Citrus-Sumter, FL Non-Metro	0.38	5	0.78	0.00	20.00	60.00	20.00	0	0	0	0	0	0	0.00	10.14	65.00	22.13		
Crestview-Fort Walton Beach-Destin, FL MSA	0.37	5	0.78	0.00	40.00	20.00	40.00	0	0	0	0	0	0	0.00	15.13	61.58	23.29		
Deltona-Daytona Beach-Ormond Beach, FL MSA	2.42	24	3.73	4.17	41.67	50.00	4.17	0	1	0	0	-1	0	3.15	20.14	52.85	23.86		
DeSoto-Highlands, FL Non-Metro	0.36	5	0.78	0.00	60.00	40.00	0.00	0	2	0	-2	0	0	0.00	30.94	63.57	5.47		
Gainesville, FL MSA	1.12	9	1.40	22.22	11.11	33.33	33.33	0	2	0	0	-1	-1	19.62	20.76	26.64	32.98		
Jacksonville, FL MSA	7.99	61	9.47	1.64	24.59	45.90	27.87	0	0	0	0	0	0	4.58	19.22	46.38	29.81		
Lakeland-Winter Haven, FL MSA	1.47	23	3.57	17.39	26.09	39.13	17.39	1	2	0	0	-1	0	2.08	23.27	52.70	21.96		
Madison-Taylor, FL Non-Metro	0.11	2	0.31	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	14.82	85.18	0.00		
Monroe County, FL Non-Metro	0.18	2	0.31	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	2.27	25.49	72.18		
Naples-Marco Island, FL MSA	1.99	16	2.48	0.00	12.50	37.50	50.00	1	4	0	0	-2	-1	9.05	20.27	43.40	27.27		
North Port-Bradenton-Sarasota, FL MSA	3.62	30	4.66	0.00	23.33	50.00	26.67	0	1	0	0	0	-1	2.67	23.45	46.77	27.11		
Ocala, FL MSA	1.12	11	1.71	0.00	18.18	36.36	45.45	0	0	0	0	0	0	0.00	16.88	67.81	15.31		
Palm Bay-Melbourne-Titusville, FL MSA	2.43	19	2.95	0.00	26.32	31.58	42.11	0	0	0	0	0	0	2.39	20.42	47.51	29.68		
Palm Coast, FL MSA	0.41	3	0.47	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	11.27	77.54	11.19		
Panama City-Lynn Haven-Panama City Beach, FL MSA	0.24	3	0.47	0.00	0.00	33.33	66.67	0	1	0	0	-1	0	2.17	19.59	56.82	21.42		
Panhandle FL Non-Metro	0.24	6	0.93	0.00	16.67	33.33	50.00	0	1	0	0	0	-1	0.00	5.68	70.29	24.03		
Pensacola-Ferry Pass-Brent, FL MSA	0.78	9	1.40	0.00	55.56	33.33	11.11	0	1	0	-1	0	0	1.67	22.17	49.75	26.41		
Port St Lucie, FL MSA	1.63	16	2.48	6.25	31.25	43.75	18.75	0	0	0	0	0	0	2.29	19.63	55.65	22.43		
Punta Gorda, FL MSA	0.93	8	1.24	0.00	12.50	75.00	12.50	0	0	0	0	0	0	0.00	7.06	76.70	16.23		
Sebastian-Vero Beach, FL MSA	1.07	6	0.93	16.67	0.00	66.67	16.67	0	0	0	0	0	0	2.30	14.60	59.37	23.73		
Tallahassee, FL MSA	0.95	7	1.09	14.29	57.14	0.00	28.57	1	1	0	0	0	0	12.13	28.43	31.19	26.48		

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: GEORGIA												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Atlanta-Sandy Springs-Marietta, GA MSA	81.19	67,073	12,596,253	21,784	810,175	73	1,763	21	147,645	88,951	13,555,836	86.74
Limited Review:												
Athens-Clarke County, GA MSA	2.43	2,330	368,199	332	24,574	5	506	0	0	2,667	393,279	0.99
Brunswick, GA MSA	0.80	749	143,324	126	4,086	0	0	0	0	875	147,410	0.17
Bulloch County, GA Non-Metro	0.44	406	56,853	68	1,382	3	121	0	0	477	58,355	0.32
Chattanooga, GA MSA	1.03	1,019	130,649	107	4,098	2	40	0	0	1,128	134,787	0.35
Dalton, GA MSA	0.81	697	76,181	189	15,848	3	139	0	0	889	92,168	1.48
Gainesville, GA MSA	2.03	1,697	282,786	525	41,256	6	704	0	0	2,228	324,746	1.75
Gordon County, GA Non-Metro	0.43	392	51,668	75	3,626	2	35	0	0	469	55,329	0.20
Greene County, GA Non-Metro	0.18	159	45,155	43	1,422	0	0	0	0	202	46,577	0.17
Hinesville-Fort Stewart, GA MSA	0.72	738	100,294	47	1,200	0	0	0	0	785	101,494	0.15
Jackson County, GA Non-Metro	0.74	717	106,494	89	3,045	1	22	0	0	807	109,561	0.12
Laurens County, GA Non-Metro	0.29	295	38,817	22	957	0	0	1	822	318	40,596	0.09
Lumpkin County, GA Non-Metro	0.29	251	39,709	67	2,612	0	0	0	0	318	42,321	0.21
Macon, GA MSA	1.65	1,535	237,250	262	14,818	5	622	2	600	1,804	253,290	0.88
Rome, GA MSA	0.63	597	75,430	97	4,108	1	8	0	0	695	79,546	0.79
Savannah, GA MSA	4.42	3,931	706,327	901	51,070	2	40	3	9,327	4,837	766,763	4.63
Southern GA Non-Metro	0.22	186	21,239	56	1,268	2	5	0	0	244	22,512	0.21
Sumter County, GA Non-Metro	0.17	128	14,879	53	1,388	1	86	0	0	182	16,353	0.35
Warner Robins, GA MSA	1.49	1,494	261,092	132	5,058	1	15	0	0	1,627	266,165	0.32
Washington County, GA Non-Metro	0.05	40	4,176	13	198	0	0	1	1,293	54	5,667	0.08

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: GEORGIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	28,401	79.00	2.35	1.71	17.94	12.95	43.69	46.43	36.02	38.90	23.32	18.06	24.75	24.26	22.02
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	822	2.29	2.67	1.95	12.20	10.58	44.09	36.50	41.05	50.97	28.16	16.36	27.14	30.02	27.87
Brunswick, GA MSA	324	0.90	1.92	0.31	17.22	10.19	43.59	25.93	37.27	63.58	17.53	50.00	20.91	18.10	16.73
Bulloch County, GA Non-Metro	172	0.48	0.00	0.00	0.00	0.00	61.47	76.16	38.53	23.84	19.25	0.00	0.00	21.69	13.38
Chattanooga, GA MSA	398	1.11	0.00	0.00	13.64	8.79	79.02	83.67	7.34	7.54	15.43	0.00	12.12	15.88	14.88
Dalton, GA MSA	351	0.98	0.00	0.00	8.92	17.09	79.45	75.50	11.63	7.41	20.02	0.00	22.30	20.86	11.11
Gainesville, GA MSA	718	2.00	0.00	0.00	5.18	5.99	78.96	73.54	15.86	20.47	21.83	0.00	32.69	21.73	19.46
Gordon County, GA Non-Metro	154	0.43	0.00	0.00	0.00	0.00	59.44	55.19	40.56	44.81	18.18	0.00	0.00	18.10	18.28
Greene County, GA Non-Metro	37	0.10	0.00	0.00	7.88	5.41	80.32	91.89	11.81	2.70	13.02	0.00	50.00	12.84	5.88
Hinesville-Fort Stewart, GA MSA	516	1.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	27.16	0.00	0.00	27.16	0.00
Jackson County, GA Non-Metro	313	0.87	0.00	0.00	0.00	0.00	46.09	31.63	53.91	68.37	21.58	0.00	0.00	25.48	20.00
Laurens County, GA Non-Metro	107	0.30	5.82	0.93	8.67	4.67	48.65	34.58	36.87	59.81	25.10	20.00	30.00	24.36	25.32
Lumpkin County, GA Non-Metro	78	0.22	0.00	0.00	0.00	0.00	24.15	19.23	75.85	80.77	15.36	0.00	0.00	14.00	15.67
Macon, GA MSA	636	1.77	6.34	0.31	12.24	6.45	42.59	35.38	38.84	57.86	22.69	3.57	25.24	24.50	21.87
Rome, GA MSA	212	0.59	0.00	0.00	13.37	8.02	76.24	79.72	10.38	12.26	20.36	0.00	20.31	20.60	19.09
Savannah, GA MSA	1,808	5.03	3.92	2.21	20.46	7.91	44.90	53.48	30.73	36.39	20.82	20.63	23.02	20.24	21.27
Southern GA Non-Metro	72	0.20	0.00	0.00	10.32	6.94	89.68	93.06	0.00	0.00	13.21	0.00	13.79	13.16	0.00
Sumter County, GA Non-Metro	53	0.15	0.00	0.00	20.87	16.98	60.22	66.04	18.92	16.98	16.50	0.00	20.51	17.21	11.11
Warner Robins, GA MSA	762	2.12	2.27	0.39	10.53	3.28	61.23	51.18	25.98	45.14	21.00	22.22	19.77	21.10	20.97
Washington County, GA Non-Metro	15	0.04	0.00	0.00	0.00	0.00	88.19	100.00	11.81	0.00	14.75	0.00	0.00	15.79	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: GEORGIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Atlanta-Sandy Springs-Marietta, GA MSA	1,270	74.66	2.35	0.87	17.94	12.20	43.69	37.64	36.02	49.29	22.17	19.57	16.12	20.91	26.03
Limited Review:															
Athens-Clarke County, GA MSA	45	2.65	2.67	2.22	12.20	6.67	44.09	37.78	41.05	53.33	12.93	12.50	10.53	10.17	16.39
Brunswick, GA MSA	15	0.88	1.92	0.00	17.22	0.00	43.59	26.67	37.27	73.33	6.45	0.00	0.00	5.88	9.52
Bulloch County, GA Non-Metro	11	0.65	0.00	0.00	0.00	0.00	61.47	72.73	38.53	27.27	13.51	0.00	0.00	12.50	15.38
Chattanooga, GA MSA	35	2.06	0.00	0.00	13.64	5.71	79.02	82.86	7.34	11.43	9.13	0.00	2.38	9.52	21.05
Dalton, GA MSA	31	1.82	0.00	0.00	8.92	9.68	79.45	74.19	11.63	16.13	11.57	0.00	9.09	10.53	20.00
Gainesville, GA MSA	31	1.82	0.00	0.00	5.18	3.23	78.96	83.87	15.86	12.90	16.82	0.00	0.00	16.67	33.33
Gordon County, GA Non-Metro	14	0.82	0.00	0.00	0.00	0.00	59.44	71.43	40.56	28.57	10.00	0.00	0.00	13.51	4.35
Greene County, GA Non-Metro	4	0.24	0.00	0.00	7.88	0.00	80.32	100.00	11.81	0.00	5.26	0.00	0.00	6.25	0.00
Hinesville-Fort Stewart, GA MSA	12	0.71	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.11	0.00	0.00	10.11	0.00
Jackson County, GA Non-Metro	18	1.06	0.00	0.00	0.00	0.00	46.09	38.89	53.91	61.11	16.13	0.00	0.00	20.00	13.51
Laurens County, GA Non-Metro	10	0.59	5.82	0.00	8.67	0.00	48.65	20.00	36.87	80.00	18.18	0.00	0.00	16.67	22.22
Lumpkin County, GA Non-Metro	7	0.41	0.00	0.00	0.00	0.00	24.15	14.29	75.85	85.71	8.89	0.00	0.00	0.00	11.43
Macon, GA MSA	33	1.94	6.34	6.06	12.24	3.03	42.59	39.39	38.84	51.52	10.31	0.00	10.00	6.93	17.14
Rome, GA MSA	20	1.18	0.00	0.00	13.37	10.00	76.24	50.00	10.38	40.00	16.67	0.00	12.50	9.43	54.55
Savannah, GA MSA	94	5.53	3.92	2.13	20.46	14.89	44.90	56.38	30.73	26.60	20.36	20.00	16.22	23.01	18.03
Southern GA Non-Metro	9	0.53	0.00	0.00	10.32	11.11	89.68	88.89	0.00	0.00	7.89	0.00	0.00	8.22	0.00
Sumter County, GA Non-Metro	17	1.00	0.00	0.00	20.87	23.53	60.22	52.94	18.92	23.53	20.51	0.00	50.00	14.81	25.00
Warner Robins, GA MSA	24	1.41	2.27	0.00	10.53	4.17	61.23	66.67	25.98	29.17	8.21	0.00	0.00	9.64	7.14
Washington County, GA Non-Metro	1	0.06	0.00	0.00	0.00	0.00	88.19	0.00	11.81	100.00	7.69	0.00	0.00	0.00	100.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: GEORGIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	37,388	79.95	2.35	0.98	17.94	8.59	43.69	36.65	36.02	53.77	23.73	21.58	22.66	23.89	23.84
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	1,463	3.13	2.67	3.21	12.20	8.00	44.09	30.69	41.05	58.10	22.97	20.69	20.45	23.28	23.37
Brunswick, GA MSA	410	0.88	1.92	0.49	17.22	8.29	43.59	27.32	37.27	63.90	13.22	0.00	10.73	11.95	14.31
Bulloch County, GA Non-Metro	223	0.48	0.00	0.00	0.00	0.00	61.47	61.43	38.53	38.57	18.11	0.00	0.00	17.98	18.34
Chattanooga, GA MSA	586	1.25	0.00	0.00	13.64	9.22	79.02	79.18	7.34	11.60	13.51	0.00	12.30	13.17	17.80
Dalton, GA MSA	315	0.67	0.00	0.00	8.92	6.98	79.45	79.68	11.63	13.33	14.17	0.00	15.79	14.17	13.48
Gainesville, GA MSA	948	2.03	0.00	0.00	5.18	1.90	78.96	70.99	15.86	27.11	21.53	0.00	19.48	20.64	24.89
Gordon County, GA Non-Metro	224	0.48	0.00	0.00	0.00	0.00	59.44	50.00	40.56	50.00	19.00	0.00	0.00	16.85	21.36
Greene County, GA Non-Metro	118	0.25	0.00	0.00	7.88	3.39	80.32	81.36	11.81	15.25	16.51	0.00	30.77	15.98	16.67
Hinesville-Fort Stewart, GA MSA	210	0.45	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.23	0.00	0.00	10.23	0.00
Jackson County, GA Non-Metro	386	0.83	0.00	0.00	0.00	0.00	46.09	26.94	53.91	73.06	21.62	0.00	0.00	20.50	22.14
Laurens County, GA Non-Metro	178	0.38	5.82	4.49	8.67	4.49	48.65	38.76	36.87	52.25	21.95	15.00	13.33	19.82	25.29
Lumpkin County, GA Non-Metro	166	0.36	0.00	0.00	0.00	0.00	24.15	16.27	75.85	83.73	16.82	0.00	0.00	10.89	18.12
Macon, GA MSA	865	1.85	6.34	0.46	12.24	3.70	42.59	30.98	38.84	64.86	16.07	5.56	11.86	14.74	17.75
Rome, GA MSA	364	0.78	0.00	0.00	13.37	7.42	76.24	81.32	10.38	11.26	18.36	0.00	13.11	18.86	19.33
Savannah, GA MSA	2,028	4.34	3.92	2.02	20.46	7.94	44.90	47.68	30.73	42.36	20.30	20.14	19.02	21.82	19.05
Southern GA Non-Metro	105	0.22	0.00	0.00	10.32	4.76	89.68	95.24	0.00	0.00	10.33	0.00	5.00	11.05	0.00
Sumter County, GA Non-Metro	58	0.12	0.00	0.00	20.87	15.52	60.22	53.45	18.92	31.03	13.91	0.00	10.64	13.02	17.44
Warner Robins, GA MSA	706	1.51	2.27	0.14	10.53	2.27	61.23	45.33	25.98	52.27	14.18	0.00	7.91	13.57	15.57
Washington County, GA Non-Metro	24	0.05	0.00	0.00	0.00	0.00	88.19	87.50	11.81	12.50	10.69	0.00	0.00	10.56	11.76

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: GEORGIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	14	73.68	11.41	28.57	31.17	14.29	31.09	21.43	26.33	35.71	4.14	15.38	1.82	4.55	3.03
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	0	0.00	29.91	0.00	30.20	0.00	3.94	0.00	35.95	0.00	0.00	0.00	0.00	0.00	0.00
Brunswick, GA MSA	0	0.00	6.16	0.00	15.66	0.00	32.55	0.00	45.63	0.00	0.00	0.00	0.00	0.00	0.00
Bulloch County, GA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	92.27	0.00	7.73	0.00	0.00	0.00	0.00	0.00	0.00
Chattanooga, GA MSA	0	0.00	0.00	0.00	31.71	0.00	66.67	0.00	1.63	0.00	0.00	0.00	0.00	0.00	0.00
Dalton, GA MSA	0	0.00	0.00	0.00	51.73	0.00	21.53	0.00	26.73	0.00	0.00	0.00	0.00	0.00	0.00
Gainesville, GA MSA	0	0.00	0.00	0.00	34.69	0.00	63.49	0.00	1.82	0.00	0.00	0.00	0.00	0.00	0.00
Gordon County, GA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	49.83	0.00	50.17	0.00	0.00	0.00	0.00	0.00	0.00
Greene County, GA Non-Metro	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
Hinesville-Fort Stewart, GA 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
Jackson County, GA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	62.73	0.00	37.27	0.00	0.00	0.00	0.00	0.00	0.00
Laurens County, GA Non-Metro	0	0.00	36.52	0.00	8.77	0.00	37.00	0.00	17.70	0.00	0.00	0.00	0.00	0.00	0.00
Lumpkin County, GA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	85.10	0.00	14.90	0.00	0.00	0.00	0.00	0.00	0.00
Macon, GA MSA	1	5.26	13.32	0.00	17.21	0.00	27.34	0.00	42.13	100.00	0.00	0.00	0.00	0.00	0.00
Rome, GA MSA	1	5.26	0.00	0.00	50.00	0.00	41.82	100.00	8.18	0.00	0.00	0.00	0.00	0.00	0.00
Savannah, GA MSA	1	5.26	8.63	0.00	28.75	0.00	34.30	0.00	28.32	100.00	0.00	0.00	0.00	0.00	0.00
Southern GA Non-Metro	0	0.00	0.00	0.00	17.52	0.00	82.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sumter County, GA Non-Metro	0	0.00	0.00	0.00	13.81	0.00	85.48	0.00	0.71	0.00	0.00	0.00	0.00	0.00	0.00
Warner Robins, GA MSA	2	10.53	4.41	0.00	15.54	0.00	79.73	100.00	0.31	0.00	10.00	0.00	0.00	11.11	0.00
Washington County, GA Non-Metro	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

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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	21,784	87.18	3.59	2.52	17.16	11.73	40.35	33.03	38.91	52.72	16.02	18.20	13.39	14.95	18.08
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	332	1.33	11.17	13.55	13.49	15.36	28.60	20.48	46.74	50.60	8.42	12.78	9.03	7.23	8.33
Brunswick, GA MSA	126	0.50	6.73	6.35	20.48	18.25	30.75	28.57	42.04	46.83	4.36	4.44	3.49	5.18	4.71
Bulloch County, GA Non-Metro	68	0.27	0.00	0.00	0.00	0.00	62.79	64.71	37.21	35.29	5.38	0.00	0.00	5.12	6.20
Chattanooga, GA MSA	107	0.43	0.00	0.00	13.48	18.69	78.88	72.90	7.64	8.41	6.52	0.00	10.81	6.78	3.74
Dalton, GA MSA	189	0.76	0.00	0.00	25.73	31.22	62.65	51.85	11.63	16.93	8.59	0.00	13.66	6.81	8.77
Gainesville, GA MSA	525	2.10	0.00	0.00	17.11	13.90	67.86	68.38	15.03	17.71	11.44	0.00	11.71	10.87	16.55
Gordon County, GA Non-Metro	75	0.30	0.00	0.00	0.00	0.00	61.17	50.67	38.83	49.33	6.49	0.00	0.00	4.87	9.30
Greene County, GA Non-Metro	43	0.17	0.00	0.00	3.32	2.33	88.51	79.07	8.17	18.60	10.39	0.00	33.33	9.22	33.33
Hinesville-Fort Stewart, GA MSA	47	0.19	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.58	0.00	0.00	12.24	0.00
Jackson County, GA Non-Metro	89	0.36	0.00	0.00	0.00	0.00	36.20	26.97	63.80	73.03	7.10	0.00	0.00	5.85	8.72
Laurens County, GA Non-Metro	22	0.09	8.86	27.27	8.14	4.55	41.31	36.36	41.69	31.82	3.61	12.24	0.00	2.55	2.94
Lumpkin County, GA Non-Metro	67	0.27	0.00	0.00	0.00	0.00	28.88	31.34	71.12	68.66	10.34	0.00	0.00	11.41	10.39
Macon, GA MSA	262	1.05	13.36	13.36	12.54	12.21	32.75	21.76	41.36	52.67	6.39	5.23	5.49	4.40	8.51
Rome, GA MSA	97	0.39	0.00	0.00	29.89	29.90	59.79	67.01	10.32	3.09	5.83	0.00	6.61	6.60	0.93
Savannah, GA MSA	900	3.60	5.27	2.44	18.08	17.44	46.83	44.56	29.60	35.56	14.17	25.42	14.38	13.49	14.43
Southern GA Non-Metro	56	0.22	0.00	0.00	7.64	7.14	92.36	92.86	0.00	0.00	4.98	0.00	4.88	5.19	0.00
Sumter County, GA Non-Metro	53	0.21	0.00	0.00	20.47	20.75	64.39	71.70	15.14	7.55	10.83	0.00	9.33	13.82	3.85
Warner Robins, GA MSA	132	0.53	3.37	9.85	14.03	14.39	58.92	52.27	23.68	23.48	6.25	15.25	7.25	5.80	5.81
Washington County, GA Non-Metro	13	0.05	0.00	0.00	0.00	0.00	90.48	100.00	9.52	0.00	9.26	0.00	0.00	10.99	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms															
Geography: GEORGIA															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
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	73	68.22	1.69	0.00	17.57	10.96	49.07	47.95	31.67	41.10	27.04	0.00	13.46	24.74	47.83
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	5	4.67	2.47	0.00	5.43	0.00	50.25	100.00	41.85	0.00	4.69	0.00	0.00	5.00	0.00
Brunswick, GA MSA	0	0.00	2.24	0.00	14.93	0.00	43.28	0.00	39.55	0.00	0.00	0.00	0.00	0.00	0.00
Bulloch County, GA Non-Metro	3	2.80	0.00	0.00	0.00	0.00	67.02	100.00	32.98	0.00	1.00	0.00	0.00	1.49	0.00
Chattanooga, GA MSA	2	1.87	0.00	0.00	6.65	0.00	85.76	100.00	7.59	0.00	11.11	0.00	0.00	11.11	0.00
Dalton, GA MSA	3	2.80	0.00	0.00	9.88	33.33	80.25	0.00	9.88	66.67	20.00	0.00	100.00	0.00	100.00
Gainesville, GA MSA	6	5.61	0.00	0.00	6.72	0.00	80.76	66.67	12.52	33.33	11.11	0.00	0.00	8.00	50.00
Gordon County, GA Non-Metro	2	1.87	0.00	0.00	0.00	0.00	67.63	100.00	32.37	0.00	3.85	0.00	0.00	5.88	0.00
Greene County, GA Non-Metro	0	0.00	0.00	0.00	11.39	0.00	78.48	0.00	10.13	0.00	0.00	0.00	0.00	0.00	0.00
Hinesville-Fort Stewart, GA 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
Jackson County, GA Non-Metro	1	0.93	0.00	0.00	0.00	0.00	38.38	100.00	61.62	0.00	7.14	0.00	0.00	16.67	0.00
Laurens County, GA Non-Metro	0	0.00	3.21	0.00	1.60	0.00	51.34	0.00	43.85	0.00	0.00	0.00	0.00	0.00	0.00
Lumpkin County, GA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	19.23	0.00	80.77	0.00	0.00	0.00	0.00	0.00	0.00
Macon, GA MSA	5	4.67	4.87	0.00	5.71	0.00	42.52	0.00	46.89	100.00	12.50	0.00	0.00	0.00	33.33
Rome, GA MSA	1	0.93	0.00	0.00	11.11	0.00	77.31	100.00	11.57	0.00	23.08	0.00	25.00	25.00	0.00
Savannah, GA MSA	2	1.87	2.49	0.00	17.72	50.00	49.05	0.00	30.75	50.00	25.00	100.00	50.00	0.00	25.00
Southern GA Non-Metro	2	1.87	0.00	0.00	3.51	0.00	96.49	100.00	0.00	0.00	0.82	0.00	0.00	0.83	0.00
Sumter County, GA Non-Metro	1	0.93	0.00	0.00	11.45	0.00	62.05	0.00	26.51	100.00	2.94	0.00	0.00	0.00	8.33
Warner Robins, GA MSA	1	0.93	0.93	0.00	12.77	0.00	59.81	100.00	26.48	0.00	4.35	0.00	0.00	6.25	0.00
Washington County, GA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	90.28	0.00	9.72	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	28,401	79.00	20.00	18.82	18.13	24.87	22.32	20.26	39.56	36.04	21.77	22.74	20.85	21.40	22.15
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	822	2.29	21.70	12.18	17.37	24.49	20.56	21.65	40.37	41.68	27.85	35.33	32.09	26.76	24.73
Brunswick, GA MSA	324	0.90	22.52	10.10	17.09	15.33	19.20	25.44	41.19	49.13	17.03	17.36	13.18	20.16	17.10
Bulloch County, GA Non-Metro	172	0.48	17.47	1.94	15.50	18.71	19.29	28.39	47.75	50.97	19.46	0.00	20.55	21.24	18.58
Chattanooga, GA MSA	398	1.11	20.05	17.45	20.48	28.53	26.22	24.93	33.25	29.09	15.25	17.12	12.61	17.51	15.49
Dalton, GA MSA	351	0.98	18.65	25.76	18.94	35.25	24.07	22.71	38.34	16.27	18.57	23.60	17.95	19.91	13.74
Gainesville, GA MSA	718	2.00	18.60	23.90	18.77	23.58	24.32	17.77	38.31	34.75	20.85	25.94	18.92	17.53	20.94
Gordon County, GA Non-Metro	154	0.43	13.71	7.96	16.45	23.01	21.75	24.78	48.09	44.25	13.57	10.34	11.18	13.79	16.99
Greene County, GA Non-Metro	37	0.10	22.55	3.13	13.74	12.50	18.70	9.38	45.01	75.00	11.49	16.67	27.27	14.29	9.09
Hinesville-Fort Stewart, GA MSA	516	1.44	18.74	1.08	18.39	10.54	23.75	48.82	39.12	39.57	28.12	13.33	30.53	30.57	25.10
Jackson County, GA Non-Metro	313	0.87	16.00	6.20	14.68	16.67	17.57	28.68	51.75	48.45	18.11	23.26	17.33	15.25	19.63
Laurens County, GA Non-Metro	107	0.30	22.32	7.45	16.12	21.28	19.62	22.34	41.94	48.94	23.47	9.09	16.00	25.58	27.52
Lumpkin County, GA Non-Metro	78	0.22	15.12	4.05	14.51	16.22	18.96	25.68	51.41	54.05	15.74	16.67	10.34	20.59	14.39
Macon, GA MSA	636	1.77	23.52	10.58	15.68	29.81	20.25	27.16	40.55	32.45	21.55	23.28	24.21	21.68	19.08
Rome, GA MSA	212	0.59	19.86	12.84	18.93	29.05	21.32	25.00	39.90	33.11	15.82	15.71	20.41	16.67	12.53
Savannah, GA MSA	1,808	5.03	22.13	6.84	16.78	19.72	20.45	28.47	40.65	44.98	20.82	19.09	17.65	20.67	22.90
Southern GA Non-Metro	72	0.20	24.00	4.92	18.91	26.23	20.32	29.51	36.78	39.34	12.30	0.00	14.08	14.00	11.53
Sumter County, GA Non-Metro	53	0.15	23.38	7.84	17.80	21.57	21.39	23.53	37.43	47.06	18.39	16.67	14.29	12.82	22.73
Warner Robins, GA MSA	762	2.12	19.67	12.72	17.94	31.14	24.69	28.36	37.70	27.78	20.60	21.68	20.33	22.18	18.83
Washington County, GA Non-Metro	15	0.04	26.41	30.77	15.80	15.38	16.07	30.77	41.72	23.08	14.58	50.00	20.00	12.50	8.70

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.5% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: GEORGIA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	1,270	74.66	20.00	10.50	18.13	20.25	22.32	22.27	39.56	46.97	21.18	15.16	21.59	21.77	22.66
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	45	2.65	21.70	4.44	17.37	24.44	20.56	13.33	40.37	57.78	14.73	5.88	13.33	17.86	16.67
Brunswick, GA MSA	15	0.88	22.52	0.00	17.09	13.33	19.20	33.33	41.19	53.33	6.90	0.00	3.70	13.64	12.50
Bulloch County, GA Non-Metro	11	0.65	17.47	18.18	15.50	18.18	19.29	9.09	47.75	54.55	14.29	20.00	0.00	0.00	15.38
Chattanooga, GA MSA	35	2.06	20.05	15.15	20.48	21.21	26.22	33.33	33.25	30.30	8.85	4.00	10.64	7.55	14.29
Dalton, GA MSA	31	1.82	18.65	6.45	18.94	38.71	24.07	19.35	38.34	35.48	11.67	0.00	13.79	9.38	15.91
Gainesville, GA MSA	31	1.82	18.60	7.14	18.77	21.43	24.32	17.86	38.31	53.57	15.31	0.00	18.18	17.39	21.88
Gordon County, GA Non-Metro	14	0.82	13.71	14.29	16.45	28.57	21.75	28.57	48.09	28.57	10.34	25.00	17.65	7.14	4.35
Greene County, GA Non-Metro	4	0.24	22.55	0.00	13.74	0.00	18.70	0.00	45.01	100.00	5.56	0.00	0.00	0.00	7.69
Hinesville-Fort Stewart, GA MSA	12	0.71	18.74	0.00	18.39	18.18	23.75	45.45	39.12	36.36	9.41	0.00	0.00	18.18	10.81
Jackson County, GA Non-Metro	18	1.06	16.00	0.00	14.68	0.00	17.57	29.41	51.75	70.59	15.00	0.00	0.00	20.00	16.67
Laurens County, GA Non-Metro	10	0.59	22.32	11.11	16.12	22.22	19.62	33.33	41.94	33.33	15.63	20.00	40.00	14.29	6.67
Lumpkin County, GA Non-Metro	7	0.41	15.12	0.00	14.51	14.29	18.96	14.29	51.41	71.43	9.30	0.00	10.00	14.29	8.70
Macon, GA MSA	33	1.94	23.52	9.38	15.68	18.75	20.25	28.13	40.55	43.75	10.11	9.09	7.84	8.33	13.43
Rome, GA MSA	20	1.18	19.86	20.00	18.93	15.00	21.32	40.00	39.90	25.00	17.65	11.76	14.29	30.00	12.50
Savannah, GA MSA	94	5.53	22.13	14.13	16.78	21.74	20.45	33.70	40.65	30.43	21.67	22.22	17.65	25.00	21.92
Southern GA Non-Metro	9	0.53	24.00	11.11	18.91	22.22	20.32	22.22	36.78	44.44	8.33	0.00	6.25	13.33	11.54
Sumter County, GA Non-Metro	17	1.00	23.38	17.65	17.80	17.65	21.39	17.65	37.43	47.06	22.86	33.33	0.00	33.33	25.00
Warner Robins, GA MSA	24	1.41	19.67	4.17	17.94	20.83	24.69	25.00	37.70	50.00	8.33	0.00	14.29	9.09	7.41
Washington County, GA Non-Metro	1	0.06	26.41	0.00	15.80	100.00	16.07	0.00	41.72	0.00	10.00	0.00	20.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.3% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: GEORGIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Atlanta-Sandy Springs-Marietta, GA MSA	37,388	79.95	20.00	4.86	18.13	13.18	22.32	21.44	39.56	60.51	25.13	19.87	24.01	25.52	25.84
<b>Limited Review:</b>															
Athens-Clarke County, GA MSA	1,463	3.13	21.70	4.32	17.37	14.33	20.56	23.12	40.37	58.23	26.04	16.84	26.35	29.39	25.80
Brunswick, GA MSA	410	0.88	22.52	3.94	17.09	13.52	19.20	20.56	41.19	61.97	14.53	8.62	15.08	13.40	15.56
Bulloch County, GA Non-Metro	223	0.48	17.47	1.95	15.50	5.85	19.29	18.05	47.75	74.15	21.90	20.00	18.42	18.69	23.11
Chattanooga, GA MSA	586	1.25	20.05	7.86	20.48	22.79	26.22	27.90	33.25	41.45	15.01	11.11	14.66	15.46	16.04
Dalton, GA MSA	315	0.67	18.65	5.95	18.94	18.59	24.07	20.45	38.34	55.02	15.22	7.41	15.02	12.13	17.97
Gainesville, GA MSA	948	2.03	18.60	5.09	18.77	15.15	24.32	24.36	38.31	55.39	23.26	17.47	24.01	23.17	23.85
Gordon County, GA Non-Metro	224	0.48	13.71	4.04	16.45	17.17	21.75	18.18	48.09	60.61	20.42	21.74	21.54	18.40	20.90
Greene County, GA Non-Metro	118	0.25	22.55	0.00	13.74	4.46	18.70	6.25	45.01	89.29	18.60	0.00	15.00	18.52	18.89
Hinesville-Fort Stewart, GA MSA	210	0.45	18.74	3.05	18.39	8.40	23.75	19.85	39.12	68.70	10.28	6.90	10.53	8.16	11.28
Jackson County, GA Non-Metro	386	0.83	16.00	2.17	14.68	10.56	17.57	18.63	51.75	68.63	22.90	11.90	25.00	21.56	23.77
Laurens County, GA Non-Metro	178	0.38	22.32	3.07	16.12	9.82	19.62	15.34	41.94	71.78	24.19	8.33	16.67	15.71	29.93
Lumpkin County, GA Non-Metro	166	0.36	15.12	2.13	14.51	11.35	18.96	19.86	51.41	66.67	18.40	11.76	12.00	15.63	21.07
Macon, GA MSA	865	1.85	23.52	4.12	15.68	12.77	20.25	22.61	40.55	60.51	17.55	14.18	13.24	17.24	19.14
Rome, GA MSA	364	0.78	19.86	4.11	18.93	10.44	21.32	24.05	39.90	61.39	20.59	12.50	16.06	23.12	21.89
Savannah, GA MSA	2,028	4.34	22.13	3.30	16.78	12.81	20.45	21.64	40.65	62.25	22.87	15.77	21.64	22.09	24.15
Southern GA Non-Metro	105	0.22	24.00	3.33	18.91	15.56	20.32	18.89	36.78	62.22	10.74	8.57	7.87	11.86	11.41
Sumter County, GA Non-Metro	58	0.12	23.38	3.85	17.80	7.69	21.39	25.00	37.43	63.46	16.18	18.18	7.50	15.79	18.80
Warner Robins, GA MSA	706	1.51	19.67	6.63	17.94	18.01	24.69	24.22	37.70	51.14	14.30	11.36	15.00	13.52	15.04
Washington County, GA Non-Metro	24	0.05	26.41	0.00	15.80	0.00	16.07	33.33	41.72	66.67	13.28	0.00	0.00	20.69	13.41

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 16.6% of loans originated and purchase by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: GEORGIA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Atlanta-Sandy Springs-Marietta, GA MSA	21.78	87.1	66.86	62.39	94.97	2.89	2.13	16.02	22.20
<b>Limited Review:</b>									
Athens-Clarke County, GA MSA	332	1.3	67.04	56.33	86.75	6.02	7.23	8.42	10.58
Brunswick, GA MSA	126	0.5	67.90	69.05	97.62	0.79	1.59	4.36	6.74
Bulloch County, GA Non-Metro	68	0.2	68.97	76.47	100.00	0.00	0.00	5.38	6.63
Chattanooga, GA MSA	107	0.4	71.66	75.70	94.39	2.80	2.80	6.52	12.81
Dalton, GA MSA	189	0.7	65.70	57.67	84.66	5.29	10.05	8.59	10.51
Gainesville, GA MSA	525	2.1	70.68	52.57	85.52	5.71	8.76	11.44	15.15
Gordon County, GA Non-Metro	75	0.3	69.05	80.00	93.33	2.67	4.00	6.49	8.88
Greene County, GA Non-Metro	43	0.1	69.14	62.79	95.35	2.33	2.33	10.39	15.79
Hinesville-Fort Stewart, GA MSA	47	0.1	67.36	76.60	93.62	4.26	2.13	11.58	22.31
Jackson County, GA Non-Metro	89	0.3	70.53	66.29	96.63	1.12	2.25	7.10	10.68
Laurens County, GA Non-Metro	22	0.0	67.53	81.82	95.45	0.00	4.55	3.61	5.00
Lumpkin County, GA Non-Metro	67	0.2	72.89	62.69	95.52	2.99	1.49	10.34	14.00
Macon, GA MSA	262	1.0	66.60	64.50	87.79	6.49	5.73	6.39	7.40
Rome, GA MSA	97	0.3	66.36	68.04	92.78	5.15	2.06	5.83	8.96
Savannah, GA MSA	901	3.6	66.06	56.83	90.12	3.88	5.99	14.17	19.06
Southern GA Non-Metro	56	0.2	68.06	85.71	92.86	7.14	0.00	4.98	8.63
Sumter County, GA Non-Metro	53	0.2	68.74	64.15	96.23	3.77	0.00	10.83	14.86
Warner Robins, GA MSA	132	0.5	67.21	71.21	93.18	5.30	1.52	6.25	8.31
Washington County, GA Non-Metro	13	0.0	69.63	84.62	100.00	0.00	0.00	9.26	20.00

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 21.9% 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: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Atlanta-Sandy Springs-Marietta, GA MSA	73	68.22	96.76	71.23	98.63	0.00	1.37	27.04	33.61
<b>Limited Review:</b>									
Athens-Clarke County, GA MSA	5	4.67	97.53	80.00	80.00	0.00	20.00	4.69	3.70
Brunswick, GA MSA	0	0.00	97.39	0.00	0.00	0.00	0.00	0.00	0.00
Bulloch County, GA Non-Metro	3	2.80	98.58	0.00	100.00	0.00	0.00	1.00	0.00
Chattanooga, GA MSA	2	1.87	98.73	100.00	100.00	0.00	0.00	11.11	25.00
Dalton, GA MSA	3	2.80	97.94	66.67	100.00	0.00	0.00	20.00	14.29
Gainesville, GA MSA	6	5.61	96.91	0.00	66.67	16.67	16.67	11.11	0.00
Gordon County, GA Non-Metro	2	1.87	96.53	100.00	100.00	0.00	0.00	3.85	4.76
Greene County, GA Non-Metro	0	0.00	94.94	0.00	0.00	0.00	0.00	0.00	0.00
Hinesville-Fort Stewart, GA MSA	0	0.00	97.65	0.00	0.00	0.00	0.00	0.00	0.00
Jackson County, GA Non-Metro	1	0.93	97.42	100.00	100.00	0.00	0.00	7.14	11.11
Laurens County, GA Non-Metro	0	0.00	97.86	0.00	0.00	0.00	0.00	0.00	0.00
Lumpkin County, GA Non-Metro	0	0.00	99.04	0.00	0.00	0.00	0.00	0.00	0.00
Macon, GA MSA	5	4.67	97.48	100.00	60.00	20.00	20.00	12.50	13.04
Rome, GA MSA	1	0.93	98.15	100.00	100.00	0.00	0.00	23.08	25.00
Savannah, GA MSA	2	1.87	97.07	100.00	100.00	0.00	0.00	25.00	50.00
Southern GA Non-Metro	2	1.87	97.95	100.00	100.00	0.00	0.00	0.82	1.09
Sumter County, GA Non-Metro	1	0.93	95.78	100.00	100.00	0.00	0.00	2.94	4.17
Warner Robins, GA MSA	1	0.93	98.13	100.00	100.00	0.00	0.00	4.35	5.00
Washington County, GA Non-Metro	0	0.00	98.61	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2011).

\*\*\*\* 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 7.5% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS			Geography: GEORGIA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012				
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>									
Atlanta-Sandy Springs-Marietta, GA MSA	39	41,365	236	101,496	275	142,861	86.39	0	0
<b>Limited Review:</b>									
Athens-Clarke County, GA MSA	0	0	29	173	29	173	0.10	0	0
Brunswick, GA MSA	0	0	2	15	2	15	0.01	0	0
Bulloch County, GA Non-Metro	2	87	1	2	3	89	0.05	0	0
Chattanooga, GA MSA	0	0	1	1	1	1	0.00	0	0
Dalton, GA MSA	0	0	5	27	5	27	0.02	0	0
Gainesville, GA MSA	2	345	9	61	11	406	0.25	0	0
Gordon County, GA Non-Metro	0	0	0	0	0	0	0.00	0	0
Greene County, GA Non-Metro	0	0	1	1	1	1	0.00	0	0
Hinesville-Fort Stewart, GA MSA	0	0	1	1	1	1	0.00	0	0
Jackson County, GA Non-Metro	1	24	1	1	2	25	0.02	0	0
Laurens County, GA Non-Metro	0	0	0	0	0	0	0.00	0	0
Lumpkin County, GA Non-Metro	0	0	1	1	1	1	0.00	0	0
Macon, GA MSA	2	558	6	51	8	608	0.37	0	0
Rome, GA MSA	0	0	1	5	1	5	0.00	0	0
Savannah, GA MSA	1	2,400	15	147	16	2,547	1.54	0	0
Southern GA Non-Metro	0	0	1	1	1	1	0.00	0	0
Sumter County, GA Non-Metro	0	0	16	6,806	16	6,806	4.12	0	0
Warner Robins, GA MSA	0	0	4	4,485	4	4,485	2.71	0	0
Washington County, GA Non-Metro	0	0	0	0	0	0	0.00	0	0
<b>Statewide:</b>									
Georgia Statewide	3	6,921	2	400	5	7,321	4.43	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: GEORGIA				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Atlanta-Sandy Springs-Marietta, GA MSA	86.74	193	77.51	4.66	27.46	28.50	39.38	1	1	0	0	0	0	6.22	24.34	39.10	30.22		
Limited Review:																			
Athens-Clarke County, GA MSA	0.99	4	1.61	25.00	0.00	25.00	50.00	0	0	0	0	0	0	14.56	16.05	40.99	28.40		
Brunswick, GA MSA	0.17	2	0.80	0.00	50.00	0.00	50.00	0	0	0	0	0	0	0.00	32.87	45.10	22.03		
Bulloch County, GA Non-Metro	0.32	1	0.40	0.00	0.00	100.00	0.00	0	0	0	0	0	0	20.04	4.78	32.58	42.61		
Chattanooga, GA MSA	0.35	3	1.20	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	30.81	50.86	18.33		
Dalton, GA MSA	1.48	4	1.61	0.00	50.00	25.00	25.00	0	0	0	0	0	0	2.99	12.38	61.10	23.53		
Gainesville, GA MSA	1.76	7	2.81	0.00	57.14	14.29	28.57	0	0	0	0	0	0	0.00	27.13	49.72	23.15		
Gordon County, GA Non-Metro	0.20	1	0.40	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	80.49	19.51		
Greene County, GA Non-Metro	0.17	1	0.40	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	46.35	41.83	11.81		
Hinesville-Fort Stewart, GA MSA	0.15	1	0.40	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	13.27	78.90	7.83		
Jackson County, GA Non-Metro	0.12	1	0.40	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	46.49	53.51		
Laurens County, GA Non-Metro	0.09	1	0.40	0.00	0.00	100.00	0.00	0	0	0	0	0	0	5.30	0.00	57.32	37.38		
Lumpkin County, GA Non-Metro	0.21	1	0.40	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	75.08	24.92		
Macon, GA MSA	0.88	3	1.20	0.00	0.00	33.33	66.67	0	0	0	0	0	0	10.54	22.44	36.31	30.71		
Rome, GA MSA	0.79	3	1.20	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	24.94	44.98	30.08		
Savannah, GA MSA	4.63	15	6.02	6.67	33.33	26.67	33.33	0	0	0	0	0	0	7.84	20.88	37.70	33.58		
Southern GA Non-Metro	0.21	3	1.20	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.00	37.26	62.74	0.00		
Sumter County, GA Non-Metro	0.35	2	0.80	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	19.87	68.13	11.99		
Warner Robins, GA MSA	0.32	2	0.80	0.00	50.00	0.00	50.00	0	1	0	-1	0	0	6.88	26.27	36.30	30.55		
Washington County, GA Non-Metro	0.08	1	0.40	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	23.54	76.46	0.00		

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: IDAHO								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Boise City-Nampa, ID MSA	41.91	19,215	3,303,103	13,738	527,377	433	33,594	11	29,394	33,397	3,893,468	48.10
Central ID Non-Metro	15.11	6,288	1,140,289	4,557	221,603	1,192	97,210	2	3,244	12,039	1,462,347	15.04
Limited Review:												
Bear Lake County, ID Non-Metro	0.27	142	23,009	71	4,090	5	90	0	0	218	27,189	0.55
Coeur d'Alene, ID MSA	14.38	8,173	1,614,772	3,221	118,837	66	2,833	1	2,694	11,461	1,739,136	9.08
Idaho Falls, ID MSA	8.19	3,962	630,954	2,425	110,158	138	9,293	3	10,989	6,528	761,394	6.53
Lewiston, ID MSA	2.80	1,402	211,621	748	35,390	79	8,454	1	1,650	2,230	257,116	3.29
Panhandle ID Non-Metro	9.57	4,514	788,480	2,785	120,968	323	24,988	1	750	7,623	935,187	10.23
Pocatello, ID MSA	3.42	1,647	230,544	994	44,819	82	6,474	0	0	2,723	281,838	4.38
Rexburg-Driggs, ID Non-Metro	2.84	1,331	254,880	849	45,376	86	7,749	0	0	2,266	308,005	1.74
Western ID Non-Metro	1.51	703	100,997	435	18,591	65	4,977	1	256	1,204	124,820	1.06

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	7,513	43.66	0.81	0.28	16.94	11.99	48.94	45.55	33.31	42.18	17.15	19.05	15.99	16.92	17.79
Central ID Non-Metro	2,008	11.67	0.00	0.00	6.33	10.66	79.62	69.67	14.05	19.67	17.15	0.00	18.40	16.10	21.01
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	29	0.17	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	6.33	0.00	0.00	6.33	0.00
Coeur d'Alene, ID MSA	3,028	17.60	0.00	0.00	5.20	3.40	77.44	82.00	17.36	14.60	27.29	0.00	21.37	27.03	30.46
Idaho Falls, ID MSA	1,410	8.19	0.00	0.00	10.92	8.65	67.32	71.99	21.76	19.36	20.87	0.00	22.75	20.94	20.04
Lewiston, ID MSA	527	3.06	0.00	0.00	8.13	10.06	42.83	38.90	49.04	51.04	31.19	0.00	41.67	30.32	29.72
Panhandle ID Non-Metro	1,563	9.08	0.00	0.00	6.38	1.79	86.15	84.33	7.47	13.88	31.22	0.00	22.92	32.73	23.98
Pocatello, ID MSA	491	2.85	0.00	0.00	18.36	22.81	52.28	44.20	29.37	32.99	9.87	0.00	9.44	9.80	10.20
Rexburg-Driggs, ID Non-Metro	428	2.49	0.00	0.00	1.81	1.64	84.52	91.59	13.67	6.78	21.83	0.00	37.50	22.08	16.98
Western ID Non-Metro	212	1.23	0.00	0.00	10.10	9.43	89.90	90.57	0.00	0.00	20.69	0.00	26.67	20.07	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	392	30.46	0.81	0.00	16.94	12.50	48.94	48.98	33.31	38.52	12.71	0.00	11.11	11.80	13.94
Central ID Non-Metro	213	16.55	0.00	0.00	6.33	7.51	79.62	77.00	14.05	15.49	15.17	0.00	8.33	15.03	19.23
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	12	0.93	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.76	0.00	0.00	11.76	0.00
Coeur d'Alene, ID MSA	219	17.02	0.00	0.00	5.20	4.11	77.44	75.34	17.36	20.55	25.19	0.00	12.50	25.00	29.03
Idaho Falls, ID MSA	106	8.24	0.00	0.00	10.92	4.72	67.32	73.58	21.76	21.70	6.58	0.00	0.00	8.26	3.33
Lewiston, ID MSA	52	4.04	0.00	0.00	8.13	11.54	42.83	28.85	49.04	59.62	17.74	0.00	22.22	6.25	21.62
Panhandle ID Non-Metro	182	14.14	0.00	0.00	6.38	2.20	86.15	85.71	7.47	12.09	25.00	0.00	20.00	22.12	50.00
Pocatello, ID MSA	56	4.35	0.00	0.00	18.36	17.86	52.28	33.93	29.37	48.21	7.69	0.00	22.22	5.26	6.45
Rexburg-Driggs, ID Non-Metro	37	2.87	0.00	0.00	1.81	0.00	84.52	94.59	13.67	5.41	28.57	0.00	0.00	29.41	25.00
Western ID Non-Metro	18	1.40	0.00	0.00	10.10	5.56	89.90	94.44	0.00	0.00	17.39	0.00	0.00	20.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	11,303	39.17	0.81	0.06	16.94	9.26	48.94	45.78	33.31	44.90	22.69	20.00	23.21	22.68	22.60
Central ID Non-Metro	4,063	14.08	0.00	0.00	6.33	7.14	79.62	68.45	14.05	24.42	23.83	0.00	27.72	22.86	26.13
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	101	0.35	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	12.58	0.00	0.00	12.58	0.00
Coeur d'Alene, ID MSA	4,922	17.06	0.00	0.00	5.20	2.38	77.44	77.00	17.36	20.62	31.17	0.00	32.84	30.97	31.83
Idaho Falls, ID MSA	2,442	8.46	0.00	0.00	10.92	5.24	67.32	71.05	21.76	23.71	18.20	0.00	18.93	18.06	18.46
Lewiston, ID MSA	820	2.84	0.00	0.00	8.13	8.41	42.83	33.05	49.04	58.54	23.21	0.00	26.09	19.08	25.11
Panhandle ID Non-Metro	2,768	9.59	0.00	0.00	6.38	2.60	86.15	85.69	7.47	11.71	23.96	0.00	23.38	22.74	33.09
Pocatello, ID MSA	1,100	3.81	0.00	0.00	18.36	13.73	52.28	48.82	29.37	37.45	11.95	0.00	12.87	12.42	11.10
Rexburg-Driggs, ID Non-Metro	861	2.98	0.00	0.00	1.81	0.81	84.52	90.94	13.67	8.25	19.78	0.00	8.33	20.94	11.82
Western ID Non-Metro	473	1.64	0.00	0.00	10.10	9.09	89.90	90.91	0.00	0.00	22.41	0.00	19.30	22.89	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	7	25.00	1.79	0.00	38.62	57.14	32.77	28.57	26.82	14.29	0.00	0.00	0.00	0.00	0.00
Central ID Non-Metro	4	14.29	0.00	0.00	11.76	0.00	53.45	100.00	34.79	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	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
Coeur d'Alene, ID MSA	4	14.29	0.00	0.00	24.85	25.00	61.21	50.00	13.94	25.00	20.00	0.00	25.00	0.00	0.00
Idaho Falls, ID MSA	4	14.29	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
Lewiston, ID MSA	3	10.71	0.00	0.00	35.15	0.00	31.56	66.67	33.28	33.33	0.00	0.00	0.00	0.00	0.00
Panhandle ID Non-Metro	1	3.57	0.00	0.00	0.68	0.00	80.32	100.00	19.00	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
Rexburg-Driggs, ID Non-Metro	5	17.86	0.00	0.00	28.75	60.00	71.05	40.00	0.20	0.00	50.00	0.00	0.00	50.00	0.00
Western ID Non-Metro	0	0.00	0.00	0.00	19.39	0.00	80.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	13,738	46.07	0.71	0.87	20.82	19.04	42.52	41.18	35.96	38.91	27.00	32.00	27.31	26.51	28.34
Central ID Non-Metro	4,557	15.28	0.00	0.00	8.64	10.93	71.62	74.41	19.74	14.66	29.19	0.00	35.17	28.23	36.53
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	71	0.24	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	22.22	0.00	0.00	24.53	0.00
Coeur d'Alene, ID MSA	3,221	10.80	0.00	0.00	12.55	10.18	74.13	75.16	13.32	14.65	26.37	0.00	20.11	28.63	22.13
Idaho Falls, ID MSA	2,425	8.13	0.00	0.00	15.82	16.91	61.96	57.90	22.22	25.20	22.75	0.00	21.11	21.63	28.85
Lewiston, ID MSA	748	2.51	0.00	0.00	29.21	37.03	32.79	24.87	38.00	38.10	24.29	0.00	23.08	20.59	28.92
Panhandle ID Non-Metro	2,785	9.34	0.00	0.00	4.51	2.23	89.50	90.27	5.99	7.50	30.60	0.00	36.28	32.51	32.74
Pocatello, ID MSA	994	3.33	0.00	0.00	28.09	37.32	46.33	34.41	25.59	28.27	20.09	0.00	23.46	19.36	19.27
Rexburg-Driggs, ID Non-Metro	849	2.85	0.00	0.00	2.36	1.88	85.72	86.57	11.93	11.54	19.90	0.00	11.54	22.53	20.00
Western ID Non-Metro	435	1.46	0.00	0.00	8.28	6.67	91.72	93.33	0.00	0.00	23.28	0.00	28.57	24.14	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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	433	17.54	0.28	0.23	19.50	24.25	58.09	59.82	22.13	15.70	30.12	0.00	22.66	32.77	46.88
Central ID Non-Metro	1,192	48.28	0.00	0.00	4.85	6.12	85.71	89.35	9.44	4.53	36.47	0.00	53.49	34.93	75.00
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	5	0.20	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.54	0.00	0.00	11.54	0.00
Coeur d'Alene, ID MSA	66	2.67	0.00	0.00	5.45	3.03	80.00	89.39	14.55	7.58	56.76	0.00	0.00	57.58	66.67
Idaho Falls, ID MSA	138	5.59	0.00	0.00	5.05	3.62	79.95	80.43	15.01	15.94	12.77	0.00	28.57	10.24	42.31
Lewiston, ID MSA	79	3.20	0.00	0.00	17.26	13.92	53.81	41.77	28.93	44.30	30.77	0.00	25.00	29.63	34.62
Panhandle ID Non-Metro	323	13.08	0.00	0.00	8.57	5.88	86.73	90.71	4.70	3.41	40.73	0.00	53.85	42.99	18.18
Pocatello, ID MSA	82	3.32	0.00	0.00	7.66	0.00	73.78	76.83	18.56	23.17	26.67	0.00	50.00	26.92	20.00
Rexburg-Driggs, ID Non-Metro	86	3.48	0.00	0.00	0.84	0.00	86.01	84.88	13.15	15.12	12.30	0.00	0.00	14.19	5.71
Western ID Non-Metro	65	2.63	0.00	0.00	4.07	6.15	95.93	93.85	0.00	0.00	24.73	0.00	50.00	24.44	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	7,513	43.66	17.91	12.67	19.17	23.47	23.63	24.03	39.29	39.84	17.29	14.06	14.70	17.06	20.76
Central ID Non-Metro	2,008	11.67	17.13	5.75	19.25	21.17	24.20	25.77	39.42	47.31	17.50	11.18	14.77	17.13	21.11
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	29	0.17	15.09	0.00	24.20	6.90	22.46	24.14	38.25	68.97	6.76	0.00	0.00	12.00	4.76
Coeur d'Alene, ID MSA	3,028	17.60	17.20	5.85	19.03	21.08	25.04	27.24	38.73	45.83	28.37	23.66	24.65	26.25	33.22
Idaho Falls, ID MSA	1,410	8.19	18.07	10.25	18.91	23.94	23.84	26.94	39.18	38.87	22.47	21.51	19.20	22.17	25.75
Lewiston, ID MSA	527	3.06	17.21	7.87	19.54	26.77	20.62	32.48	42.63	32.87	30.19	27.59	35.59	30.43	26.32
Panhandle ID Non-Metro	1,563	9.08	19.86	4.28	18.91	17.19	23.29	23.45	37.94	55.07	32.96	34.00	38.97	33.85	30.78
Pocatello, ID MSA	491	2.85	19.76	10.19	18.53	25.27	22.10	29.30	39.62	35.24	11.10	10.42	10.57	12.33	10.80
Rexburg-Driggs, ID Non-Metro	428	2.49	16.70	3.83	17.89	12.20	25.46	21.77	39.95	62.20	24.90	29.63	16.22	20.31	28.94
Western ID Non-Metro	212	1.23	19.84	12.00	20.48	24.50	25.20	27.50	34.48	36.00	18.84	15.15	22.08	15.29	20.62

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: IDAHO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	392	30.46	17.91	9.76	19.17	21.64	23.63	24.27	39.29	44.33	12.46	15.63	11.94	12.35	12.10
Central ID Non-Metro	213	16.55	17.13	5.34	19.25	14.56	24.20	29.13	39.42	50.97	13.54	0.00	3.45	12.73	17.65
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	12	0.93	15.09	8.33	24.20	16.67	22.46	16.67	38.25	58.33	12.50	0.00	100.00	0.00	11.11
Coeur d'Alene, ID MSA	219	17.02	17.20	4.23	19.03	20.19	25.04	24.41	38.73	51.17	23.77	0.00	30.77	15.15	29.63
Idaho Falls, ID MSA	106	8.24	18.07	5.71	18.91	20.00	23.84	27.62	39.18	46.67	6.67	30.00	10.00	10.26	1.23
Lewiston, ID MSA	52	4.04	17.21	5.88	19.54	11.76	20.62	17.65	42.63	64.71	16.95	28.57	13.33	7.14	21.74
Panhandle ID Non-Metro	182	14.14	19.86	5.52	18.91	15.47	23.29	22.65	37.94	56.35	25.38	11.11	17.39	17.65	34.38
Pocatello, ID MSA	56	4.35	19.76	5.36	18.53	10.71	22.10	30.36	39.62	53.57	8.11	0.00	0.00	11.54	10.34
Rexburg-Driggs, ID Non-Metro	37	2.87	16.70	0.00	17.89	11.43	25.46	31.43	39.95	57.14	31.58	0.00	50.00	50.00	26.67
Western ID Non-Metro	18	1.40	19.84	11.11	20.48	11.11	25.20	27.78	34.48	50.00	17.39	100.00	0.00	0.00	30.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Boise City-Nampa, ID MSA	11,303	39.17	17.91	6.99	19.17	17.24	23.63	24.80	39.29	50.97	23.78	18.72	21.16	21.50	26.84
Central ID Non-Metro	4,063	14.08	17.13	3.60	19.25	13.60	24.20	22.86	39.42	59.94	23.92	20.69	23.15	20.18	25.85
<b>Limited Review:</b>															
Bear Lake County, ID Non-Metro	101	0.35	15.09	5.56	24.20	4.44	22.46	21.11	38.25	68.89	12.40	25.00	0.00	3.70	16.67
Coeur d'Alene, ID MSA	4,922	17.06	17.20	4.34	19.03	15.87	25.04	25.10	38.73	54.69	33.80	26.14	29.93	34.84	35.66
Idaho Falls, ID MSA	2,442	8.46	18.07	6.70	18.91	18.49	23.84	27.28	39.18	47.53	20.63	27.78	21.26	19.93	19.71
Lewiston, ID MSA	820	2.84	17.21	3.20	19.54	15.26	20.62	26.89	42.63	54.65	21.17	16.67	23.53	17.79	22.51
Panhandle ID Non-Metro	2,768	9.59	19.86	3.71	18.91	13.00	23.29	24.87	37.94	58.41	26.30	20.19	24.11	26.55	27.19
Pocatello, ID MSA	1,100	3.81	19.76	5.11	18.53	15.13	22.10	28.66	39.62	51.10	13.74	10.91	9.76	13.02	15.87
Rexburg-Driggs, ID Non-Metro	861	2.98	16.70	2.54	17.89	9.14	25.46	22.34	39.95	65.99	24.56	22.22	21.79	20.38	26.51
Western ID Non-Metro	473	1.64	19.84	5.20	20.48	15.35	25.20	28.47	34.48	50.99	23.78	10.53	23.73	22.83	25.95

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 14.0% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: IDAHO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	13,73	46.0	72.58	69.24	94.96	3.02	2.02	27.00	40.48
Central ID Non-Metro	4,55	15.2	71.79	68.69	92.21	4.39	3.40	29.19	39.40
<b>Limited Review:</b>									
Bear Lake County, ID Non-Metro	71	0.2	61.83	53.52	91.55	1.41	7.04	22.22	21.88
Coeur d'Alene, ID MSA	3,22	10.8	73.57	75.38	95.25	2.61	2.14	26.37	37.32
Idaho Falls, ID MSA	2,42	8.1	71.62	68.49	92.74	4.08	3.18	22.75	29.68
Lewiston, ID MSA	748	2.5	71.88	64.17	92.25	4.81	2.94	24.29	29.23
Panhandle ID Non-Metro	2,78	9.3	72.21	72.06	94.11	3.20	2.69	30.60	42.65
Pocatello, ID MSA	994	3.3	69.75	59.26	93.16	4.02	2.82	20.09	27.19
Rexburg-Driggs, ID Non-Metro	849	2.8	70.06	72.56	91.87	3.77	4.36	19.90	28.28
Western ID Non-Metro	435	1.4	75.10	58.85	92.18	4.60	3.22	23.28	34.44

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 17.1% 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: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Boise City-Nampa, ID MSA	433	17.54	96.53	73.21	78.98	12.01	9.01	30.12	30.04
Central ID Non-Metro	1,192	48.28	94.15	70.81	80.37	11.66	7.97	36.47	34.28
<b>Limited Review:</b>									
Bear Lake County, ID Non-Metro	5	0.20	100.00	100.00	100.00	0.00	0.00	11.54	11.54
Coeur d'Alene, ID MSA	66	2.67	97.98	74.24	93.94	3.03	3.03	56.76	57.69
Idaho Falls, ID MSA	138	5.59	95.22	84.06	81.16	13.77	5.07	12.77	13.07
Lewiston, ID MSA	79	3.20	97.97	69.62	72.15	13.92	13.92	30.77	26.00
Panhandle ID Non-Metro	323	13.08	98.43	87.00	80.50	10.22	9.29	40.73	40.89
Pocatello, ID MSA	82	3.32	95.82	78.05	75.61	14.63	9.76	26.67	27.03
Rexburg-Driggs, ID Non-Metro	86	3.48	96.24	79.07	66.28	26.74	6.98	12.30	10.92
Western ID Non-Metro	65	2.63	96.95	89.23	83.08	6.15	10.77	24.73	22.62

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 8.4% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: IDAHO		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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	10	7,798	68	11,915	78	19,713	46.17	0	0
Central ID Non-Metro	8	3,445	11	1,592	19	5,038	11.80	0	0
<b>Limited Review:</b>									
Bear Lake County, ID Non-Metro	0	0	0	0	0	0	0.00	0	0
Coeur d'Alene, ID MSA	5	2,822	10	4,303	15	7,125	16.69	0	0
Idaho Falls, ID MSA	2	1,344	1	4,364	3	5,708	13.37	0	0
Lewiston, ID MSA	1	403	2	10	3	413	0.97	0	0
Panhandle ID Non-Metro	2	1,870	12	6	14	1,876	4.39	0	0
Pocatello, ID MSA	2	2,287	12	133	14	2,419	5.67	0	0
Rexburg-Driggs, ID Non-Metro	0	0	0	0	0	0	0.00	0	0
Western ID Non-Metro	2	404	0	0	2	404	0.95	0	0
<b>Statewide:</b>									
Idaho Statewide	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: IDAHO																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Boise City-Nampa, ID MSA	48.10	25	28.09	0.00	44.00	40.00	16.00	0	2	0	-2	0	0	1.18	28.18	43.45	27.19
Central ID Non-Metro	15.04	21	23.60	0.00	14.29	61.90	23.81	0	2	0	0	-1	-1	0.00	8.93	76.51	14.53
Limited Review:																	
Bear Lake County, ID Non-Metro	0.55	1	1.12	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Coeur d'Alene, ID MSA	9.08	7	7.87	28.57	28.57	42.86	0.00	0	0	0	0	0	0	3.45	13.17	67.49	15.88
Idaho Falls, ID MSA	6.53	8	8.99	0.00	37.50	37.50	25.00	0	0	0	0	0	0	0.00	17.71	61.48	20.82
Lewiston, ID MSA	3.29	2	2.25	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	12.48	73.91	13.62
Panhandle ID Non-Metro	10.23	15	16.85	0.00	6.67	93.33	0.00	0	2	0	0	-2	0	0.00	6.80	89.25	3.95
Pocatello, ID MSA	4.38	5	5.62	0.00	20.00	80.00	0.00	0	0	0	0	0	0	3.22	14.40	59.27	23.17
Rexburg-Driggs, ID Non-Metro	1.74	3	3.37	33.33	0.00	66.67	0.00	0	0	0	0	0	0	14.73	17.74	57.00	10.53
Western ID Non-Metro	1.06	2	2.25	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

**Table 1. Lending Volume**

Table 1: Lending Volume

LENDING VOLUME		Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:													
Chicago-Joliet-Naperville, IL MD	97.80	149,356	34,023,337	15,977	586,030	61	2,631	7	35,814	165,401	34,647,811	82.57	
Limited Review:													
Galesburg-Canton, IL Non-Metro	1.72	1,713	148,022	771	40,479	419	61,440	0	0	2,903	249,942	15.49	
Sterling, IL Non-Metro	0.48	418	44,458	248	11,999	142	13,300	0	0	808	69,757	1.94	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE				Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago-Joliet-Naperville, IL MD	48,566	98.30	2.59	3.00	15.03	11.79	45.23	42.78	37.15	42.42	19.61	21.72	20.74	20.88	18.02
Limited Review:															
Galesburg-Canton, IL Non-Metro	722	1.46	0.00	0.00	4.43	4.71	91.27	87.95	4.30	7.34	26.54	0.00	45.45	25.88	31.11
Sterling, IL Non-Metro	116	0.23	0.00	0.00	10.35	4.31	74.03	76.72	15.62	18.97	4.17	0.00	9.09	4.25	1.79

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: ILLINOIS								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	2,718	95.54	2.59	1.73	15.03	9.79	45.23	37.56	37.15	50.92	11.28	5.95	9.13	12.41	11.62
<b>Limited Review:</b>															
Galesburg-Canton, IL Non-Metro	106	3.73	0.00	0.00	4.43	0.94	91.27	94.34	4.30	4.72	15.35	0.00	0.00	16.67	8.33
Sterling, IL Non-Metro	21	0.74	0.00	0.00	10.35	0.00	74.03	100.00	15.62	0.00	7.07	0.00	0.00	8.86	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	97,883	98.82	2.59	1.46	15.03	7.36	45.23	37.33	37.15	53.84	12.40	10.34	11.42	13.66	11.84
<b>Limited Review:</b>															
Galesburg-Canton, IL Non-Metro	885	0.89	0.00	0.00	4.43	3.05	91.27	89.72	4.30	7.23	23.14	0.00	21.74	22.71	30.16
Sterling, IL Non-Metro	280	0.28	0.00	0.00	10.35	2.50	74.03	73.57	15.62	23.93	10.58	0.00	4.00	10.48	12.21

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	72	98.63	12.02	9.72	24.02	26.39	35.72	34.72	28.23	29.17	1.04	1.25	1.01	1.13	0.81
<b>Limited Review:</b>															
Galesburg-Canton, IL Non-Metro	0	0.00	0.00	0.00	22.70	0.00	60.86	0.00	16.44	0.00	0.00	0.00	0.00	0.00	0.00
Sterling, IL Non-Metro	1	1.37	0.00	0.00	5.71	0.00	79.17	100.00	15.12	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	15,935	93.99	3.47	1.76	13.54	11.63	38.42	38.70	44.36	47.91	2.49	1.81	2.39	2.62	2.51
<b>Limited Review:</b>															
Galesburg-Canton, IL Non-Metro	771	4.55	0.00	0.00	10.17	19.46	84.41	68.87	5.42	11.67	19.41	0.00	26.35	17.97	25.40
Sterling, IL Non-Metro	248	1.46	0.00	0.00	7.73	3.23	75.94	72.58	16.33	24.19	11.43	0.00	2.86	11.54	15.84

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago-Joliet-Naperville, IL MD	61	9.83	1.32	0.00	8.70	0.00	51.50	52.46	38.49	47.54	1.92	0.00	0.00	1.33	4.69
Limited Review:															
Galesburg-Canton, IL Non-Metro	419	67.36	0.00	0.00	1.05	3.10	96.15	93.08	2.80	3.82	15.17	0.00	40.00	14.42	66.67
Sterling, IL Non-Metro	142	22.83	0.00	0.00	2.08	0.00	76.04	71.83	21.88	28.17	32.18	0.00	0.00	38.98	18.52

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Table 8: Borrower Distribution of Home Purchase Loans															
Borrower Distribution: HOME PURCHASE			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Chicago-Joliet-Naperville, IL MD	48,611	98.31	20.85	9.16	17.60	25.57	22.09	27.63	39.45	37.64	20.00	20.53	21.82	21.18	17.95
Limited Review:															
Galesburg-Canton, IL Non-Metro	722	1.46	17.36	15.09	20.80	26.42	24.60	29.32	37.25	29.17	25.29	25.27	21.57	30.43	23.96
Sterling, IL Non-Metro	116	0.23	14.00	6.14	18.47	23.68	24.76	26.32	42.77	43.86	4.40	3.51	3.74	5.45	4.48

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	2,719	95.54	20.85	5.21	17.60	15.86	22.09	27.42	39.45	51.50	10.64	3.85	10.00	12.53	11.62
<b>Limited Review:</b>															
Galesburg-Canton, IL Non-Metro	106	3.72	17.36	14.56	20.80	21.36	24.60	26.21	37.25	37.86	14.71	18.52	12.50	18.00	12.68
Sterling, IL Non-Metro	21	0.74	14.00	4.76	18.47	19.05	24.76	38.10	42.77	38.10	7.29	0.00	11.11	11.11	4.88

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: ILLINOIS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Chicago-Joliet-Naperville, IL MD	97,954	98.82	20.85	3.20	17.60	12.84	22.09	25.66	39.45	58.30	12.78	8.65	11.61	13.37	13.24
<b>Limited Review:</b>															
Galesburg-Canton, IL Non-Metro	885	0.89	17.36	8.95	20.80	21.09	24.60	27.64	37.25	42.32	23.56	23.71	24.29	26.27	21.49
Sterling, IL Non-Metro	280	0.28	14.00	4.18	18.47	16.74	24.76	26.36	42.77	52.72	9.81	12.50	13.39	9.02	8.39

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 15.1% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Chicago-Joliet-Naperville, IL MD	15,971	94.0	65.12	71.33	96.24	2.80	0.96	2.49	5.00	
<b>Limited Review:</b>										
Galesburg-Canton, IL Non-Metro	771	4.5	67.74	67.57	92.48	3.24	4.28	19.41	25.40	
Sterling, IL Non-Metro	248	1.4	69.97	66.13	91.13	6.85	2.02	11.43	17.86	

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 8.2% of small loans to businesses originated and purchased by the bank.

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

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: ILLINOIS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Chicago-Joliet-Naperville, IL MD	61	9.81	95.32	81.97	90.16	9.84	0.00	1.92	2.19
Limited Review:									
Galesburg-Canton, IL Non-Metro	419	67.36	99.12	58.00	51.55	30.07	18.38	15.17	10.38
Sterling, IL Non-Metro	142	22.83	98.54	66.90	71.13	21.13	7.75	32.18	36.36

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 24.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: ILLINOIS		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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-Joliet-Naperville, IL MD	6	2,992	57	54,567	63	57,559	91.44	0	0
<b>Limited Review:</b>									
Galesburg-Canton, IL Non-Metro	1	142	6	1,966	7	2,108	3.35	0	0
Sterling, IL Non-Metro	2	836	1	300	3	1,136	1.81	0	0
<b>Statewide:</b>									
Illinois Statewide	1	2,144	0	0	1	2,144	3.41	1	303

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: ILLINOIS								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
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	82.57	9	56.25	0.00	0.00	33.33	66.67	2	0	0	0	0	2	9.20	23.41	34.27	33.11
<b>Limited Review:</b>																	
Galesburg-Canton, IL Non-Metro	15.49	6	37.50	33.33	33.33	16.67	16.67	0	0	0	0	0	0	2.59	16.88	71.81	8.73
Sterling, IL Non-Metro	1.94	1	6.25	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	20.84	63.77	15.39

**Table 1. Lending Volume**

LENDING VOLUME				Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Fort Wayne, IN MSA	21.62	9,464	1,180,669	4,722	234,690	291	34,162	6	2,300	14,483	1,451,822	51.30
Northeastern IN Non-Metro	6.57	2,732	367,273	1,460	68,008	209	27,379	0	0	4,401	462,660	7.06
<b>Limited Review:</b>												
Decatur, IN Non-Metro	1.43	545	57,808	305	8,501	106	11,501	0	0	956	77,810	1.72
Elkhart-Goshen, IN MSA	3.21	1,768	222,206	359	15,879	21	1,053	0	0	2,148	239,138	0.00
Indianapolis-Carmel, IN MSA	49.37	29,441	4,806,970	3,344	167,504	289	37,371	4	16,792	33,078	5,028,637	0.00
Michigan City-La Porte, IN MSA	3.25	1,398	195,442	528	23,646	249	30,869	1	4,200	2,176	254,157	9.84
North Central IN Non-Metro	4.31	1,423	141,014	1,099	44,581	367	41,150	2	6,000	2,891	232,745	8.36
Rush County, IN Non-Metro	1.60	542	55,491	248	13,818	280	38,258	0	0	1,070	107,567	4.84
South Bend-Mishawaka, IN MSA	7.68	3,614	474,151	1,451	67,316	82	9,715	2	3,751	5,149	554,934	13.87
White County, IN Non-Metro	0.97	415	49,465	187	7,299	47	7,695	1	350	650	64,809	3.02

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE				Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Fort Wayne, IN MSA	3,943	19.42	0.75	0.05	18.24	11.31	58.40	49.81	22.61	38.83	16.39	33.33	23.85	16.10	15.23
Northeastern IN Non-Metro	770	3.79	0.00	0.00	0.00	0.00	87.18	82.60	12.82	17.40	13.48	0.00	0.00	12.96	15.85
Limited Review:															
Decatur, IN Non-Metro	157	0.77	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	12.66	0.00	0.00	12.66	0.00
Elkhart-Goshen, IN MSA	699	3.44	0.06	0.00	2.92	0.86	90.58	92.56	6.44	6.58	13.27	0.00	8.70	13.48	11.03
Indianapolis-Carmel, IN MSA	11,939	58.81	2.83	0.99	18.37	8.48	50.42	49.38	28.39	41.15	15.64	16.06	18.28	16.16	14.49
Michigan City-La Porte, IN MSA	448	2.21	0.00	0.00	13.50	8.93	69.17	78.13	17.33	12.95	16.48	0.00	16.82	16.82	14.74
North Central IN Non-Metro	514	2.53	0.00	0.00	2.80	3.11	89.68	80.54	7.52	16.34	16.89	0.00	15.38	16.05	23.20
Rush County, IN Non-Metro	150	0.74	0.00	0.00	14.68	16.00	85.32	84.00	0.00	0.00	29.79	0.00	20.83	31.62	0.00
South Bend-Mishawaka, IN MSA	1,559	7.68	1.29	0.38	19.73	12.25	51.29	50.48	27.68	36.88	18.35	33.33	17.45	19.41	17.04
White County, IN Non-Metro	122	0.60	0.00	0.00	11.63	6.56	88.37	93.44	0.00	0.00	11.79	0.00	9.09	12.03	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Fort Wayne, IN MSA	232	23.11	0.75	0.86	18.24	14.22	58.40	58.19	22.61	26.72	11.90	0.00	18.52	11.22	11.21	
Northeastern IN Non-Metro	108	10.76	0.00	0.00	0.00	0.00	87.18	78.70	12.82	21.30	16.46	0.00	0.00	15.94	20.00	
Limited Review:																
Decatur, IN Non-Metro	40	3.98	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.00	0.00	0.00	8.00	0.00	
Elkhart-Goshen, IN MSA	20	1.99	0.06	0.00	2.92	0.00	90.58	100.00	6.44	0.00	2.42	0.00	0.00	2.53	0.00	
Indianapolis-Carmel, IN MSA	360	35.86	2.83	1.39	18.37	10.56	50.42	48.89	28.39	39.17	6.78	9.09	8.72	6.04	7.36	
Michigan City-La Porte, IN MSA	49	4.88	0.00	0.00	13.50	4.08	69.17	83.67	17.33	12.24	7.04	0.00	5.88	8.84	0.00	
North Central IN Non-Metro	69	6.87	0.00	0.00	2.80	2.90	89.68	81.16	7.52	15.94	9.82	0.00	0.00	9.66	14.29	
Rush County, IN Non-Metro	37	3.69	0.00	0.00	14.68	18.92	85.32	81.08	0.00	0.00	20.69	0.00	33.33	17.39	0.00	
South Bend-Mishawaka, IN MSA	64	6.37	1.29	1.56	19.73	18.75	51.29	40.63	27.68	39.06	7.83	0.00	11.76	5.08	10.94	
White County, IN Non-Metro	25	2.49	0.00	0.00	11.63	16.00	88.37	84.00	0.00	0.00	4.62	0.00	20.00	3.33	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Fort Wayne, IN MSA	5,288	17.61	0.75	0.04	18.24	5.88	58.40	45.80	22.61	48.28	13.10	16.67	13.26	12.22	14.02
Northeastern IN Non-Metro	1,853	6.17	0.00	0.00	0.00	0.00	87.18	78.25	12.82	21.75	19.91	0.00	0.00	19.57	21.24
Limited Review:															
Decatur, IN Non-Metro	348	1.16	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.45	0.00	0.00	14.45	0.00
Elkhart-Goshen, IN MSA	1,049	3.49	0.06	0.00	2.92	1.53	90.58	89.70	6.44	8.77	8.48	0.00	12.90	8.30	10.22
Indianapolis-Carmel, IN MSA	17,137	57.07	2.83	0.69	18.37	6.28	50.42	44.79	28.39	48.25	10.05	11.02	12.01	10.60	9.34
Michigan City-La Porte, IN MSA	900	3.00	0.00	0.00	13.50	8.11	69.17	69.11	17.33	22.78	11.33	0.00	8.65	12.04	10.46
North Central IN Non-Metro	840	2.80	0.00	0.00	2.80	1.79	89.68	78.33	7.52	19.88	11.16	0.00	0.00	10.15	16.44
Rush County, IN Non-Metro	355	1.18	0.00	0.00	14.68	18.87	85.32	81.13	0.00	0.00	36.00	0.00	43.64	34.09	0.00
South Bend-Mishawaka, IN MSA	1,991	6.63	1.29	0.65	19.73	6.43	51.29	47.21	27.68	45.71	13.26	33.33	15.05	13.32	12.82
White County, IN Non-Metro	268	0.89	0.00	0.00	11.63	7.84	88.37	92.16	0.00	0.00	15.31	0.00	12.50	15.60	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Wayne, IN MSA	1	12.50	2.56	0.00	37.96	100.00	53.27	0.00	6.21	0.00	0.00	0.00	0.00	0.00	0.00
Northeastern IN Non-Metro	1	12.50	0.00	0.00	0.00	0.00	80.12	100.00	19.88	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Decatur, IN Non-Metro	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
Elkhart-Goshen, IN MSA	0	0.00	2.97	0.00	7.24	0.00	85.35	0.00	4.44	0.00	0.00	0.00	0.00	0.00	0.00
Indianapolis-Carmel, IN MSA	5	62.50	6.74	0.00	31.76	20.00	47.66	40.00	13.84	40.00	3.33	0.00	0.00	2.17	11.11
Michigan City-La Porte, IN MSA	1	12.50	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
North Central IN Non-Metro	0	0.00	0.00	0.00	1.18	0.00	96.75	0.00	2.07	0.00	0.00	0.00	0.00	0.00	0.00
Rush County, IN Non-Metro	0	0.00	0.00	0.00	54.25	0.00	45.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
South Bend-Mishawaka, IN 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
White County, IN Non-Metro	0	0.00	0.00	0.00	1.99	0.00	98.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Fort Wayne, IN MSA	4,719	34.45	1.04	1.38	21.49	22.76	51.74	47.51	25.60	28.35	18.27	21.67	21.59	17.56	18.17
Northeastern IN Non-Metro	1,460	10.66	0.00	0.00	0.00	0.00	89.84	84.86	10.16	15.14	25.70	0.00	0.00	26.27	30.34
<b>Limited Review:</b>															
Decatur, IN Non-Metro	305	2.23	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	27.01	0.00	0.00	27.82	0.00
Elkhart-Goshen, IN MSA	359	2.62	3.36	0.28	3.96	4.18	87.64	90.53	5.04	5.01	3.26	0.00	6.06	3.49	3.64
Indianapolis-Carmel, IN MSA	3,344	24.41	2.29	2.00	14.39	11.30	49.57	52.15	33.69	34.54	2.94	2.09	2.84	3.32	2.70
Michigan City-La Porte, IN MSA	528	3.85	0.00	0.00	25.36	10.23	60.91	80.87	13.73	8.90	10.06	0.00	5.28	13.01	6.33
North Central IN Non-Metro	1,099	8.02	0.00	0.00	1.95	1.46	89.98	87.90	8.07	10.65	24.90	0.00	29.41	26.12	26.19
Rush County, IN Non-Metro	248	1.81	0.00	0.00	20.60	23.39	79.40	76.61	0.00	0.00	29.54	0.00	29.31	30.81	0.00
South Bend-Mishawaka, IN MSA	1,451	10.59	1.53	1.65	24.82	29.22	46.80	43.97	26.84	25.16	11.84	18.92	13.41	11.95	10.81
White County, IN Non-Metro	187	1.37	0.00	0.00	7.40	5.88	92.60	94.12	0.00	0.00	21.26	0.00	31.25	21.85	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Fort Wayne, IN MSA	291	14.99	0.00	0.00	5.97	1.03	78.41	89.35	15.62	9.62	22.49	0.00	0.00	21.01	77.78
Northeastern IN Non-Metro	209	10.77	0.00	0.00	0.00	0.00	95.58	94.26	4.42	5.74	37.50	0.00	0.00	36.75	100.00
<b>Limited Review:</b>															
Decatur, IN Non-Metro	106	5.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	57.14	0.00	0.00	57.14	0.00
Elkhart-Goshen, IN MSA	21	1.08	0.37	0.00	0.87	0.00	97.01	100.00	1.74	0.00	8.70	0.00	0.00	8.70	0.00
Indianapolis-Carmel, IN MSA	289	14.89	0.93	0.00	9.63	0.69	65.06	94.12	24.39	5.19	26.22	0.00	0.00	28.80	11.54
Michigan City-La Porte, IN MSA	249	12.83	0.00	0.00	6.50	0.40	82.81	97.59	10.69	2.01	45.69	0.00	0.00	49.04	18.18
North Central IN Non-Metro	367	18.91	0.00	0.00	0.08	0.00	87.94	85.83	11.98	14.17	50.70	0.00	0.00	50.83	57.89
Rush County, IN Non-Metro	280	14.43	0.00	0.00	4.20	3.57	95.80	96.43	0.00	0.00	56.76	0.00	66.67	55.88	0.00
South Bend-Mishawaka, IN MSA	82	4.22	0.16	1.22	8.03	0.00	69.66	98.78	22.15	0.00	14.16	0.00	0.00	15.69	0.00
White County, IN Non-Metro	47	2.42	0.00	0.00	8.07	29.79	91.93	70.21	0.00	0.00	65.22	0.00	100.00	55.56	0.00

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE		Geography: INDIANA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Fort Wayne, IN MSA	3,943	19.42	17.82	23.20	19.25	30.00	24.87	23.17	38.06	23.63	17.81	20.45	17.43	16.32	17.03	
Northeastern IN Non-Metro	770	3.79	11.95	14.78	17.60	28.36	27.41	24.19	43.03	32.66	13.91	12.64	16.30	12.50	13.19	
<b>Limited Review:</b>																
Decatur, IN Non-Metro	157	0.77	13.30	19.44	19.99	34.03	27.91	24.31	38.79	22.22	11.40	13.24	9.77	13.16	10.81	
Elkhart-Goshen, IN MSA	699	3.44	16.23	19.45	19.39	33.74	27.07	22.64	37.31	24.16	13.74	18.86	15.93	10.30	12.42	
Indianapolis-Carmel, IN MSA	11,939	58.81	19.27	14.79	18.64	26.93	23.18	24.10	38.90	34.17	15.96	15.22	16.16	17.00	15.42	
Michigan City-La Porte, IN MSA	448	2.21	17.79	14.63	19.40	30.49	25.27	30.49	37.55	24.39	17.69	18.30	18.70	20.39	14.23	
North Central IN Non-Metro	514	2.53	15.08	17.62	19.46	36.27	26.12	23.57	39.34	22.54	17.06	19.87	18.21	16.59	14.16	
Rush County, IN Non-Metro	150	0.74	18.06	17.39	20.98	34.78	25.75	28.99	35.21	18.84	25.00	30.77	31.43	28.57	10.00	
South Bend-Mishawaka, IN MSA	1,559	7.68	18.53	17.85	18.63	30.37	23.48	23.23	39.36	28.55	19.48	19.12	22.48	19.42	16.72	
White County, IN Non-Metro	122	0.60	15.65	11.97	18.69	27.35	28.45	22.22	37.22	38.46	13.15	19.23	13.21	10.87	12.50	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

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

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

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

Borrower Distribution: HOME IMPROVEMENT		Geography: INDIANA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Wayne, IN MSA	232	23.11	17.82	11.40	19.25	21.93	24.87	30.26	38.06	36.40	12.30	6.33	11.57	14.18	15.04
Northeastern IN Non-Metro	108	10.76	11.95	11.32	17.60	18.87	27.41	19.81	43.03	50.00	16.56	18.75	25.00	15.91	9.80
<b>Limited Review:</b>															
Decatur, IN Non-Metro	40	3.98	13.30	12.50	19.99	20.00	27.91	22.50	38.79	45.00	8.51	0.00	6.67	0.00	15.00
Elkhart-Goshen, IN MSA	20	1.99	16.23	0.00	19.39	20.00	27.07	30.00	37.31	50.00	2.55	0.00	0.00	4.35	2.53
Indianapolis-Carmel, IN MSA	360	35.86	19.27	9.59	18.64	18.90	23.18	29.07	38.90	42.44	6.29	3.83	5.52	7.78	6.55
Michigan City-La Porte, IN MSA	49	4.88	17.79	4.17	19.40	25.00	25.27	33.33	37.55	37.50	6.91	0.00	10.87	7.14	6.45
North Central IN Non-Metro	69	6.87	15.08	12.31	19.46	26.15	26.12	32.31	39.34	29.23	8.23	6.25	10.00	10.42	5.56
Rush County, IN Non-Metro	37	3.69	18.06	20.00	20.98	20.00	25.75	20.00	35.21	40.00	19.23	0.00	33.33	0.00	26.67
South Bend-Mishawaka, IN MSA	64	6.37	18.53	15.63	18.63	23.44	23.48	20.31	39.36	40.63	8.13	11.90	1.89	4.44	13.04
White County, IN Non-Metro	25	2.49	15.65	8.00	18.69	20.00	28.45	24.00	37.22	48.00	4.92	0.00	8.33	5.26	3.70

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.9% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: INDIANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Fort Wayne, IN MSA	5,288	17.61	17.82	9.19	19.25	19.06	24.87	26.07	38.06	45.68	14.06	13.10	12.04	13.31	15.91
Northeastern IN Non-Metro	1,853	6.17	11.95	4.42	17.60	15.83	27.41	23.65	43.03	56.09	19.39	15.74	19.35	18.10	20.34
<b>Limited Review:</b>															
Decatur, IN Non-Metro	348	1.16	13.30	7.94	19.99	17.46	27.91	27.94	38.79	46.67	16.88	15.00	14.13	19.44	16.67
Elkhart-Goshen, IN MSA	1,049	3.49	16.23	6.69	19.39	19.47	27.07	27.60	37.31	46.24	6.97	4.19	5.15	7.67	7.61
Indianapolis-Carmel, IN MSA	17,137	57.07	19.27	6.41	18.64	16.91	23.18	23.92	38.90	52.76	9.54	8.92	9.36	9.01	9.91
Michigan City-La Porte, IN MSA	900	3.00	17.79	6.16	19.40	17.82	25.27	24.12	37.55	51.90	11.85	8.66	11.15	10.95	13.11
North Central IN Non-Metro	840	2.80	15.08	11.37	19.46	20.30	26.12	25.85	39.34	42.49	11.28	15.25	13.67	10.57	9.95
Rush County, IN Non-Metro	355	1.18	18.06	11.49	20.98	23.31	25.75	23.65	35.21	41.55	33.05	36.36	36.73	35.71	29.25
South Bend-Mishawaka, IN MSA	1,991	6.63	18.53	6.67	18.63	17.46	23.48	25.39	39.36	50.48	12.09	10.37	9.83	12.41	13.05
White County, IN Non-Metro	268	0.89	15.65	2.90	18.69	18.67	28.45	32.37	37.22	46.06	17.77	12.00	15.87	23.23	16.43

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 19.0% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: INDIANA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011	
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Fort Wayne, IN MSA	4,722	34.46	66.52	66.41	92.25	3.92	3.83	18.27	26.44
Northeastern IN Non-Metro	1,460	10.65	71.59	71.37	93.70	2.88	3.42	25.70	39.79
Limited Review:									
Decatur, IN Non-Metro	305	2.23	71.12	66.89	98.03	0.98	0.98	27.01	37.50
Elkhart-Goshen, IN MSA	359	2.62	67.38	69.64	95.26	2.51	2.23	3.26	6.53
Indianapolis-Carmel, IN MSA	3,344	24.40	66.06	68.99	92.70	4.19	3.11	2.94	5.42
Michigan City-La Porte, IN MSA	528	3.85	67.05	68.18	92.42	5.49	2.08	10.06	14.95
North Central IN Non-Metro	1,099	8.02	69.84	69.34	94.81	2.46	2.73	24.90	36.06
Rush County, IN Non-Metro	248	1.81	70.50	64.92	89.52	4.44	6.05	29.54	39.17
South Bend-Mishawaka, IN MSA	1,451	10.59	65.55	70.16	93.66	3.31	3.03	11.84	17.90
White County, IN Non-Metro	187	1.36	71.42	68.98	91.98	5.35	2.67	21.26	40.54

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.5% of small loans to businesses originated and purchased by the bank.

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

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: INDIANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Fort Wayne, IN MSA	291	14.99	98.22	64.95	63.23	22.68	14.09	22.49	16.89	
Northeastern IN Non-Metro	209	10.77	98.89	65.07	57.42	27.75	14.83	37.50	32.58	
<b>Limited Review:</b>										
Decatur, IN Non-Metro	106	5.46	99.42	72.64	66.04	20.75	13.21	57.14	56.25	
Elkhart-Goshen, IN MSA	21	1.08	98.88	85.71	90.48	4.76	4.76	8.70	6.25	
Indianapolis-Carmel, IN MSA	289	14.89	98.07	67.82	60.55	22.15	17.30	26.22	27.27	
Michigan City-La Porte, IN MSA	249	12.83	97.90	59.44	55.42	30.12	14.46	45.69	35.71	
North Central IN Non-Metro	367	18.91	98.13	63.76	66.49	17.44	16.08	50.70	42.27	
Rush County, IN Non-Metro	280	14.43	99.40	67.14	53.93	28.93	17.14	56.76	53.75	
South Bend-Mishawaka, IN MSA	82	4.22	96.79	67.07	53.66	34.15	12.20	14.16	11.96	
White County, IN Non-Metro	47	2.42	99.38	55.32	46.81	23.40	29.79	65.22	61.54	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 17.5% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: INDIANA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Fort Wayne, IN MSA	7	9,797	28	4,578	35	14,375	41.84	0	0
Northeastern IN Non-Metro	1	392	9	411	10	803	2.34	0	0
<b>Limited Review:</b>									
Decatur, IN Non-Metro	1	1	0	0	1	1	0.00	0	0
Elkhart-Goshen, IN MSA	1	439	1	2	2	441	1.28	0	0
Indianapolis-Carmel, IN MSA	4	2,766	15	11,493	19	14,259	41.51	0	0
Michigan City-La Porte, IN MSA	1	64	1	2	2	65	0.19	0	0
North Central IN Non-Metro	2	1,815	10	309	12	2,124	6.18	0	0
Rush County, IN Non-Metro	0	0	0	0	0	0	0.00	0	0
South Bend-Mishawaka, IN MSA	3	2,248	6	38	9	2,286	6.65	0	0
White County, IN Non-Metro	0	0	0	0	0	0	0.00	0	0
<b>Statewide:</b>									
Indiana Statewide	0	0	0	0	0	0	0.00	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: INDIANA								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
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>																	
Fort Wayne, IN MSA	51.30	16	42.11	6.25	43.75	25.00	25.00	0	0	0	0	0	0	7.72	24.57	39.52	28.03
Northeastern IN Non-Metro	7.06	5	13.16	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	90.40	9.60
<b>Limited Review:</b>																	
Decatur, IN Non-Metro	1.72	1	2.63	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.92	66.41	23.66
Elkhart-Goshen, IN MSA	0.00	0	0.00	0.00	0.00	0.00	0.00	0	1	0	0	-1	0	0.00	17.02	53.84	29.14
Indianapolis-Carmel, IN MSA	0.00	1	2.63	0.00	0.00	100.00	0.00	0	0	0	0	0	0	8.37	22.37	40.41	28.86
Michigan City-La Porte, IN MSA	9.84	1	2.63	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	24.81	58.91	16.28
North Central IN Non-Metro	8.36	5	13.16	0.00	20.00	80.00	0.00	0	1	0	0	-1	0	0.00	11.93	75.16	12.91
Rush County, IN Non-Metro	4.84	1	2.63	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	20.47	79.53	0.00
South Bend-Mishawaka, IN MSA	13.87	6	15.79	16.67	33.33	33.33	16.67	0	0	0	0	0	0	4.59	27.75	36.27	31.40
White County, IN Non-Metro	3.02	2	5.26	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	10.25	89.75	0.00

**Table 1. Lending Volume**

LENDING VOLUME				Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Cedar Rapids, IA MSA	16.84	9,893	1,474,509	3,134	164,726	309	30,500	1	10,009	13,337	1,679,744	11.19
Des Moines-West Des Moines, IA MSA	48.55	28,543	4,668,245	9,339	429,730	563	52,817	10	30,368	38,455	5,181,160	47.32
Limited Review:												
Ames, IA MSA	4.39	2,378	393,808	992	40,708	108	9,941	1	8,000	3,479	452,457	2.49
Cass County, IA Non-Metro	1.09	392	34,410	241	5,753	230	24,088	0	0	863	64,251	8.73
Crawford County, IA Non-Metro	1.28	313	28,822	330	17,071	374	45,648	0	0	1,017	91,541	1.04
Fort Dodge, IA Non-Metro	2.78	950	86,644	754	29,538	480	60,157	14	2,650	2,198	178,990	3.74
Iowa City, IA MSA	3.61	2,017	352,543	800	30,577	43	1,967	0	0	2,860	385,087	1.50
Marion County, IA Non-Metro	3.08	1,587	201,264	668	16,582	184	13,170	0	0	2,439	231,016	1.71
Marshalltown, IA Non-Metro	1.98	780	89,603	494	30,057	293	33,201	0	0	1,567	152,861	3.12
Mason City, IA Non-Metro	3.24	1,369	168,701	810	44,591	388	60,076	0	0	2,567	273,368	2.48
Ottumwa, IA Non-Metro	2.03	873	85,122	620	28,722	109	9,373	2	1,000	1,604	124,217	1.57
Palo Alto County, IA Non-Metro	0.45	122	12,024	111	2,903	125	13,368	0	0	358	28,296	0.51
Poweshiek County, IA Non-Metro	1.23	350	49,789	276	17,901	350	40,395	0	0	976	108,085	1.01
Sioux City, IA MSA	4.61	2,273	250,140	1,273	72,817	104	13,458	3	1,075	3,653	337,489	7.61
Waterloo-Cedar Falls, IA MSA	4.83	2,414	332,214	1,226	58,987	185	14,534	4	5,105	3,829	410,840	5.98

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cedar Rapids, IA MSA	3,592	18.52	0.43	0.42	9.73	5.09	67.60	60.55	22.24	33.94	13.71	11.54	14.10	13.76	13.58
Des Moines-West Des Moines, IA MSA	10,117	52.17	1.68	1.30	19.27	9.16	54.63	51.10	24.42	38.43	30.47	42.16	32.97	30.69	29.34
<b>Limited Review:</b>															
Ames, IA MSA	799	4.12	4.12	1.75	0.00	0.00	74.25	68.59	21.63	29.66	18.22	10.00	0.00	17.14	21.79
Cass County, IA Non-Metro	145	0.75	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	26.89	0.00	0.00	26.89	0.00
Crawford County, IA Non-Metro	115	0.59	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	30.68	0.00	0.00	30.68	0.00
Fort Dodge, IA Non-Metro	339	1.75	0.00	0.00	1.00	0.88	92.42	89.38	6.58	9.73	21.57	0.00	14.29	21.47	23.40
Iowa City, IA MSA	621	3.20	0.00	0.00	17.87	11.76	49.67	60.23	32.46	28.02	3.95	0.00	5.11	4.00	3.31
Marion County, IA Non-Metro	492	2.54	0.00	0.00	0.00	0.00	59.30	58.74	40.70	41.26	29.69	0.00	0.00	47.66	17.71
Marshalltown, IA Non-Metro	311	1.60	0.00	0.00	7.74	2.89	63.71	57.56	28.55	39.55	23.29	0.00	38.46	21.67	24.53
Mason City, IA Non-Metro	474	2.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	27.81	0.00	0.00	27.81	0.00
Ottumwa, IA Non-Metro	325	1.68	0.00	0.00	21.36	17.85	65.88	60.92	12.75	21.23	29.85	0.00	28.89	30.67	28.33
Palo Alto County, IA Non-Metro	34	0.18	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	31.03	0.00	0.00	31.03	0.00
Poweshiek County, IA Non-Metro	103	0.53	0.00	0.00	0.00	0.00	75.92	71.84	24.08	28.16	15.09	0.00	0.00	16.04	13.21
Sioux City, IA MSA	883	4.55	0.00	0.00	12.81	6.00	54.83	43.37	32.35	50.62	19.05	0.00	13.75	16.26	23.13
Waterloo-Cedar Falls, IA MSA	1,043	5.38	0.79	1.15	19.22	13.52	61.57	58.77	18.43	26.56	6.87	11.11	7.55	6.15	8.25

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: IOWA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cedar Rapids, IA MSA	229	13.52	0.43	0.44	9.73	4.80	67.60	65.07	22.24	29.69	8.24	0.00	8.33	7.95	9.04
Des Moines-West Des Moines, IA MSA	737	43.51	1.68	0.95	19.27	12.35	54.63	51.70	24.42	35.01	13.36	0.00	14.69	12.17	15.41
Limited Review:															
Ames, IA MSA	100	5.90	4.12	0.00	0.00	0.00	74.25	68.00	21.63	32.00	7.45	0.00	0.00	6.28	11.11
Cass County, IA Non-Metro	22	1.30	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	22.73	0.00	0.00	22.73	0.00
Crawford County, IA Non-Metro	15	0.89	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	17.14	0.00	0.00	17.14	0.00
Fort Dodge, IA Non-Metro	56	3.31	0.00	0.00	1.00	5.36	92.42	78.57	6.58	16.07	24.42	0.00	33.33	23.94	25.00
Iowa City, IA MSA	35	2.07	0.00	0.00	17.87	17.14	49.67	40.00	32.46	42.86	2.62	0.00	1.69	3.32	1.79
Marion County, IA Non-Metro	77	4.55	0.00	0.00	0.00	0.00	59.30	76.62	40.70	23.38	31.03	0.00	0.00	53.85	12.50
Marshalltown, IA Non-Metro	59	3.48	0.00	0.00	7.74	10.17	63.71	62.71	28.55	27.12	20.51	0.00	28.57	18.87	22.22
Mason City, IA Non-Metro	82	4.84	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	46.51	0.00	0.00	46.51	0.00
Ottumwa, IA Non-Metro	67	3.96	0.00	0.00	21.36	16.42	65.88	68.66	12.75	14.93	37.50	0.00	50.00	40.74	22.22
Palo Alto County, IA Non-Metro	10	0.59	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	18.18	0.00	0.00	18.18	0.00
Poweshiek County, IA Non-Metro	26	1.53	0.00	0.00	0.00	0.00	75.92	76.92	24.08	23.08	33.33	0.00	0.00	30.77	50.00
Sioux City, IA MSA	90	5.31	0.00	0.00	12.81	5.56	54.83	55.56	32.35	38.89	7.69	0.00	0.00	9.21	6.98
Waterloo-Cedar Falls, IA MSA	89	5.25	0.79	0.00	19.22	22.47	61.57	61.80	18.43	15.73	7.63	0.00	13.64	6.18	7.89

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cedar Rapids, IA MSA	6,072	18.32	0.43	0.20	9.73	3.06	67.60	56.64	22.24	40.10	17.04	26.32	16.62	16.17	18.42
Des Moines-West Des Moines, IA MSA	17,683	53.36	1.68	0.57	19.27	6.43	54.63	47.16	24.42	45.83	25.78	19.29	27.78	25.23	26.21
<b>Limited Review:</b>															
Ames, IA MSA	1,474	4.45	4.12	0.54	0.00	0.00	74.25	64.04	21.63	35.41	18.63	7.41	0.00	17.38	21.60
Cass County, IA Non-Metro	225	0.68	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	34.81	0.00	0.00	34.81	0.00
Crawford County, IA Non-Metro	181	0.55	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	34.69	0.00	0.00	34.69	0.00
Fort Dodge, IA Non-Metro	554	1.67	0.00	0.00	1.00	0.54	92.42	89.71	6.58	9.75	22.60	0.00	0.00	22.43	27.27
Iowa City, IA MSA	1,360	4.10	0.00	0.00	17.87	8.24	49.67	48.90	32.46	42.87	6.97	0.00	6.02	6.80	7.50
Marion County, IA Non-Metro	1,018	3.07	0.00	0.00	0.00	0.00	59.30	58.45	40.70	41.55	27.44	0.00	0.00	39.85	19.91
Marshalltown, IA Non-Metro	406	1.23	0.00	0.00	7.74	1.97	63.71	54.93	28.55	43.10	17.87	0.00	0.00	16.44	21.69
Mason City, IA Non-Metro	810	2.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.39	0.00	0.00	33.39	0.00
Ottumwa, IA Non-Metro	481	1.45	0.00	0.00	21.36	9.15	65.88	68.81	12.75	22.04	30.05	0.00	20.00	32.03	29.33
Palo Alto County, IA Non-Metro	78	0.24	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.78	0.00	0.00	33.78	0.00
Poweshiek County, IA Non-Metro	220	0.66	0.00	0.00	0.00	0.00	75.92	70.00	24.08	30.00	14.00	0.00	0.00	13.39	15.32
Sioux City, IA MSA	1,298	3.92	0.00	0.00	12.81	3.31	54.83	44.30	32.35	52.39	19.43	0.00	13.83	18.97	20.53
Waterloo-Cedar Falls, IA MSA	1,279	3.86	0.79	0.63	19.22	10.48	61.57	60.20	18.43	28.69	7.42	6.45	9.94	7.04	7.49

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: IOWA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Cedar Rapids, IA MSA	0	0.00	3.30	0.00	15.93	0.00	65.21	0.00	15.57	0.00	0.00	0.00	0.00	0.00	0.00
Des Moines-West Des Moines, IA MSA	6	21.43	13.23	0.00	16.06	33.33	47.62	50.00	23.10	16.67	0.99	0.00	0.00	1.96	0.00
Limited Review:															
Ames, IA MSA	5	17.86	18.74	0.00	0.00	0.00	62.78	60.00	18.48	40.00	5.26	0.00	0.00	4.17	12.50
Cass County, IA Non-Metro	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
Crawford County, IA Non-Metro	2	7.14	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
Fort Dodge, IA Non-Metro	1	3.57	0.00	0.00	18.54	0.00	72.43	100.00	9.04	0.00	0.00	0.00	0.00	0.00	0.00
Iowa City, IA MSA	1	3.57	4.22	0.00	45.39	0.00	30.77	100.00	19.62	0.00	0.00	0.00	0.00	0.00	0.00
Marion County, IA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	59.16	0.00	40.84	0.00	0.00	0.00	0.00	0.00	0.00
Marshalltown, IA Non-Metro	4	14.29	0.00	0.00	15.15	50.00	41.56	25.00	43.29	25.00	18.18	0.00	33.33	0.00	16.67
Mason City, IA Non-Metro	3	10.71	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
Ottumwa, IA Non-Metro	0	0.00	0.00	0.00	44.70	0.00	49.86	0.00	5.44	0.00	0.00	0.00	0.00	0.00	0.00
Palo Alto County, IA Non-Metro	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
Poweshiek County, IA Non-Metro	1	3.57	0.00	0.00	0.00	0.00	77.73	100.00	22.27	0.00	50.00	0.00	0.00	100.00	0.00
Sioux City, IA MSA	2	7.14	0.07	0.00	28.29	0.00	47.97	100.00	23.67	0.00	4.00	0.00	0.00	11.11	0.00
Waterloo-Cedar Falls, IA MSA	3	10.71	11.36	0.00	12.50	33.33	48.76	33.33	27.37	33.33	2.63	0.00	9.09	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Cedar Rapids, IA MSA	3,134	14.88	2.16	1.69	11.76	10.72	62.83	54.75	23.25	32.83	22.31	15.46	17.09	21.49	29.30
Des Moines-West Des Moines, IA MSA	9,339	44.33	8.44	8.33	11.19	7.88	49.00	44.82	31.37	38.97	27.37	27.08	29.87	26.86	29.14
<b>Limited Review:</b>															
Ames, IA MSA	989	4.70	9.63	13.55	0.00	0.00	59.44	59.25	28.81	27.20	22.08	23.26	0.00	24.31	19.62
Cass County, IA Non-Metro	241	1.14	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	34.18	0.00	0.00	34.72	0.00
Crawford County, IA Non-Metro	330	1.57	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	51.40	0.00	0.00	53.18	0.00
Fort Dodge, IA Non-Metro	754	3.58	0.00	0.00	9.69	27.32	86.20	65.38	4.12	7.29	22.58	0.00	41.13	19.27	29.79
Iowa City, IA MSA	800	3.80	4.53	4.63	20.11	13.00	49.17	45.13	26.19	37.25	6.17	4.90	4.88	5.20	10.22
Marion County, IA Non-Metro	668	3.17	0.00	0.00	0.00	0.00	55.37	69.61	44.63	30.39	37.30	0.00	0.00	51.22	23.93
Marshalltown, IA Non-Metro	494	2.35	0.00	0.00	6.82	5.26	63.42	62.75	29.76	31.98	28.01	0.00	19.05	28.83	29.03
Mason City, IA Non-Metro	810	3.85	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	26.85	0.00	0.00	27.30	0.00
Ottumwa, IA Non-Metro	620	2.94	0.00	0.00	20.15	24.19	68.15	55.16	11.70	20.65	35.87	0.00	33.72	29.55	59.04
Palo Alto County, IA Non-Metro	111	0.53	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	23.36	0.00	0.00	25.00	0.00
Poweshiek County, IA Non-Metro	276	1.31	0.00	0.00	0.00	0.00	85.27	84.78	14.73	15.22	32.61	0.00	0.00	33.16	38.46
Sioux City, IA MSA	1,273	6.04	2.16	4.32	23.87	27.18	41.97	32.84	32.00	35.66	28.15	33.33	29.25	27.16	29.16
Waterloo-Cedar Falls, IA MSA	1,226	5.82	7.65	13.21	13.44	10.69	60.93	59.79	17.98	16.31	15.82	26.54	10.04	16.96	12.93

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Cedar Rapids, IA MSA	309	8.04	0.34	0.00	7.57	2.27	79.98	87.70	12.12	10.03	15.49	0.00	9.52	15.29	27.78
Des Moines-West Des Moines, IA MSA	563	14.64	0.88	0.36	12.53	10.12	65.20	76.55	21.39	12.97	52.01	0.00	84.62	54.63	40.43
<b>Limited Review:</b>															
Ames, IA MSA	108	2.81	3.12	0.00	0.00	0.00	69.74	63.89	26.49	36.11	23.81	0.00	0.00	25.42	22.22
Cass County, IA Non-Metro	230	5.98	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	67.11	0.00	0.00	67.11	0.00
Crawford County, IA Non-Metro	374	9.73	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	94.00	0.00	0.00	94.00	0.00
Fort Dodge, IA Non-Metro	480	12.48	0.00	0.00	1.26	0.21	96.90	99.58	1.85	0.21	18.52	0.00	0.00	18.52	0.00
Iowa City, IA MSA	43	1.12	0.36	0.00	24.16	6.98	58.43	51.16	17.05	41.86	1.04	0.00	0.00	0.74	4.71
Marion County, IA Non-Metro	184	4.79	0.00	0.00	0.00	0.00	53.59	63.04	46.41	36.96	39.83	0.00	0.00	62.50	24.29
Marshalltown, IA Non-Metro	293	7.62	0.00	0.00	0.83	0.00	87.81	89.42	11.36	10.58	37.57	0.00	0.00	38.26	36.36
Mason City, IA Non-Metro	388	10.09	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	23.56	0.00	0.00	23.56	0.00
Ottumwa, IA Non-Metro	109	2.83	0.00	0.00	2.58	6.42	92.70	89.91	4.72	3.67	38.71	0.00	100.00	38.60	25.00
Palo Alto County, IA Non-Metro	125	3.25	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	81.48	0.00	0.00	81.48	0.00
Poweshiek County, IA Non-Metro	350	9.10	0.00	0.00	0.00	0.00	90.19	90.57	9.81	9.43	47.89	0.00	0.00	46.09	64.29
Sioux City, IA MSA	104	2.70	0.13	0.00	3.94	0.96	75.72	57.69	20.21	41.35	33.87	0.00	0.00	30.95	47.06
Waterloo-Cedar Falls, IA MSA	185	4.81	0.75	0.00	3.05	2.16	81.76	67.03	14.45	30.81	16.44	0.00	33.33	15.47	20.51

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cedar Rapids, IA MSA	3,592	18.52	15.97	16.05	19.98	28.01	26.63	26.95	37.42	28.99	13.80	14.35	13.41	13.84	13.77
Des Moines-West Des Moines, IA MSA	10,117	52.17	17.62	15.22	19.08	30.75	25.40	26.63	37.90	27.40	29.77	32.56	33.71	30.69	24.35
<b>Limited Review:</b>															
Ames, IA MSA	799	4.12	18.30	13.52	18.69	26.40	24.96	31.89	38.05	28.19	19.83	17.96	17.67	24.32	19.44
Cass County, IA Non-Metro	145	0.75	18.44	16.06	22.66	29.20	28.31	28.47	30.59	26.28	26.17	27.27	28.21	25.00	24.24
Crawford County, IA Non-Metro	115	0.59	18.37	20.75	22.33	35.85	27.33	18.87	31.97	24.53	32.43	46.15	28.57	25.00	35.71
Fort Dodge, IA Non-Metro	339	1.75	16.78	18.27	20.06	32.37	26.58	24.36	36.58	25.00	21.82	19.64	27.71	28.77	12.63
Iowa City, IA MSA	621	3.20	17.81	8.58	19.50	25.08	24.19	29.70	38.50	36.63	3.98	2.24	2.62	5.82	4.66
Marion County, IA Non-Metro	492	2.54	11.66	8.60	15.13	27.74	26.58	25.59	46.64	38.06	28.00	45.45	33.33	22.39	25.66
Marshalltown, IA Non-Metro	311	1.60	15.80	19.26	17.62	26.69	25.02	22.30	41.56	31.76	22.86	25.00	24.42	23.64	17.91
Mason City, IA Non-Metro	474	2.44	16.83	21.85	18.16	24.28	25.32	21.19	39.69	32.67	28.41	36.00	17.74	31.67	29.35
Ottumwa, IA Non-Metro	325	1.68	20.87	21.34	21.99	28.66	25.10	21.97	32.03	28.03	32.00	47.83	28.13	24.39	29.73
Palo Alto County, IA Non-Metro	34	0.18	18.21	28.13	21.19	28.13	27.11	15.63	33.48	28.13	33.33	37.50	50.00	25.00	20.00
Poweshiek County, IA Non-Metro	103	0.53	13.88	6.80	17.98	19.42	25.88	26.21	42.25	47.57	16.33	25.00	15.15	13.51	16.92
Sioux City, IA MSA	883	4.55	17.63	14.76	19.20	28.45	24.42	27.50	38.75	29.29	19.50	20.38	17.16	22.60	18.95
Waterloo-Cedar Falls, IA MSA	1,043	5.38	16.59	10.71	20.79	23.51	24.35	24.90	38.28	40.87	7.30	5.11	8.41	6.39	8.18

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.3% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: IOWA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Cedar Rapids, IA MSA	229	13.52	15.97	9.42	19.98	20.18	26.63	26.01	37.42	44.39	8.09	7.32	9.60	6.43	8.77
Des Moines-West Des Moines, IA MSA	737	43.51	17.62	10.56	19.08	20.66	25.40	27.60	37.90	41.18	12.17	10.32	13.04	12.79	12.00
Limited Review:															
Ames, IA MSA	100	5.90	18.30	1.02	18.69	24.49	24.96	19.39	38.05	55.10	7.41	0.00	10.00	6.67	8.26
Cass County, IA Non-Metro	22	1.30	18.44	5.00	22.66	25.00	28.31	30.00	30.59	40.00	15.79	0.00	16.67	0.00	28.57
Crawford County, IA Non-Metro	15	0.89	18.37	6.67	22.33	40.00	27.33	13.33	31.97	40.00	17.14	0.00	30.00	16.67	11.11
Fort Dodge, IA Non-Metro	56	3.31	16.78	10.91	20.06	16.36	26.58	21.82	36.58	50.91	24.39	16.67	36.36	17.39	27.78
Iowa City, IA MSA	35	2.07	17.81	2.94	19.50	29.41	24.19	38.24	38.50	29.41	2.74	2.17	2.67	2.33	3.31
Marion County, IA Non-Metro	77	4.55	11.66	4.05	15.13	32.43	26.58	20.27	46.64	43.24	25.93	0.00	50.00	21.43	22.22
Marshalltown, IA Non-Metro	59	3.48	15.80	5.36	17.62	25.00	25.02	19.64	41.56	50.00	17.81	11.11	25.00	5.88	22.22
Mason City, IA Non-Metro	82	4.84	16.83	7.41	18.16	22.22	25.32	20.99	39.69	49.38	45.24	60.00	45.45	30.00	50.00
Ottumwa, IA Non-Metro	67	3.96	20.87	7.46	21.99	37.31	25.10	23.88	32.03	31.34	39.47	28.57	60.00	50.00	23.08
Palo Alto County, IA Non-Metro	10	0.59	18.21	20.00	21.19	30.00	27.11	10.00	33.48	40.00	18.18	0.00	16.67	0.00	33.33
Poweshiek County, IA Non-Metro	26	1.53	13.88	11.54	17.98	15.38	25.88	26.92	42.25	46.15	33.33	100.00	0.00	42.86	20.00
Sioux City, IA MSA	90	5.31	17.63	12.22	19.20	15.56	24.42	26.67	38.75	45.56	8.33	7.89	4.00	7.84	10.89
Waterloo-Cedar Falls, IA MSA	89	5.25	16.59	7.06	20.79	30.59	24.35	29.41	38.28	32.94	7.41	9.09	9.68	5.97	6.52

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Cedar Rapids, IA MSA	6,072	18.32	15.97	5.54	19.98	17.52	26.63	25.69	37.42	51.25	18.21	15.15	17.64	17.20	19.67
Des Moines-West Des Moines, IA MSA	17,683	53.36	17.62	6.08	19.08	17.69	25.40	25.72	37.90	50.52	25.73	23.88	23.57	24.81	27.41
<b>Limited Review:</b>															
Ames, IA MSA	1,474	4.45	18.30	4.32	18.69	18.01	24.96	28.92	38.05	48.76	19.66	14.49	18.37	19.34	21.60
Cass County, IA Non-Metro	225	0.68	18.44	11.22	22.66	16.59	28.31	25.37	30.59	46.83	36.26	36.36	31.25	27.08	44.93
Crawford County, IA Non-Metro	181	0.55	18.37	12.65	22.33	29.52	27.33	21.08	31.97	36.75	33.85	50.00	37.50	30.30	30.19
Fort Dodge, IA Non-Metro	554	1.67	16.78	8.30	20.06	18.30	26.58	26.60	36.58	46.81	22.33	27.08	20.20	23.53	21.43
Iowa City, IA MSA	1,360	4.10	17.81	4.33	19.50	17.73	24.19	24.75	38.50	53.19	6.84	5.62	6.40	7.68	6.74
Marion County, IA Non-Metro	1,018	3.07	11.66	4.91	15.13	17.28	26.58	26.31	46.64	51.51	26.81	39.13	30.19	25.29	25.68
Marshalltown, IA Non-Metro	406	1.23	15.80	4.07	17.62	14.63	25.02	23.04	41.56	58.27	16.95	11.63	13.95	17.48	19.43
Mason City, IA Non-Metro	810	2.44	16.83	6.81	18.16	17.09	25.32	24.43	39.69	51.67	34.51	33.33	26.32	38.10	35.96
Ottumwa, IA Non-Metro	481	1.45	20.87	8.64	21.99	23.86	25.10	25.45	32.03	42.05	32.30	39.29	31.33	22.92	39.13
Palo Alto County, IA Non-Metro	78	0.24	18.21	4.00	21.19	18.67	27.11	21.33	33.48	56.00	36.36	0.00	46.67	25.00	41.94
Poweshiek County, IA Non-Metro	220	0.66	13.88	5.85	17.98	13.17	25.88	20.98	42.25	60.00	15.36	20.00	11.63	15.79	15.70
Sioux City, IA MSA	1,298	3.92	17.63	7.31	19.20	17.65	24.42	24.87	38.75	50.17	20.94	20.00	21.47	20.49	21.10
Waterloo-Cedar Falls, IA MSA	1,279	3.86	16.59	6.50	20.79	15.96	24.35	24.75	38.28	52.79	7.80	10.28	7.22	7.56	7.77

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 13.5% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: IOWA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Cedar Rapids, IA MSA	3,134	14.88	67.85	68.41	92.09	3.89	4.02	22.31	31.88
Des Moines-West Des Moines, IA MSA	9,339	44.33	66.83	69.83	93.54	3.32	3.14	27.37	38.78
<b>Limited Review:</b>									
Ames, IA MSA	992	4.71	65.80	73.99	95.36	2.52	2.12	22.08	32.60
Cass County, IA Non-Metro	241	1.14	71.69	77.59	99.59	0.41	0.00	34.18	57.30
Crawford County, IA Non-Metro	330	1.57	70.16	64.85	90.30	6.36	3.33	51.40	66.25
Fort Dodge, IA Non-Metro	754	3.58	68.96	66.05	95.23	2.92	1.86	22.58	30.98
Iowa City, IA MSA	800	3.80	68.57	73.75	95.00	3.25	1.75	6.17	7.93
Marion County, IA Non-Metro	668	3.17	71.75	77.99	98.35	1.65	0.00	37.30	49.64
Marshalltown, IA Non-Metro	494	2.34	68.97	69.03	91.70	2.83	5.47	28.01	36.96
Mason City, IA Non-Metro	810	3.84	69.17	65.43	90.12	6.30	3.58	26.85	35.54
Ottumwa, IA Non-Metro	620	2.94	70.19	72.42	91.61	6.77	1.61	35.87	42.92
Palo Alto County, IA Non-Metro	111	0.53	71.59	73.87	97.30	2.70	0.00	23.36	48.78
Poweshiek County, IA Non-Metro	276	1.31	73.55	76.81	93.12	2.54	4.35	32.61	46.96
Sioux City, IA MSA	1,273	6.04	66.93	65.51	89.08	6.36	4.56	28.15	38.36
Waterloo-Cedar Falls, IA MSA	1,226	5.82	67.87	66.80	92.50	4.24	3.26	15.82	20.63

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.8% 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: IOWA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Cedar Rapids, IA MSA	309	8.04	99.04	67.64	69.26	20.06	10.68	15.49	13.22	
Des Moines-West Des Moines, IA MSA	563	14.64	97.96	67.85	69.63	21.31	9.06	52.01	51.58	
<b>Limited Review:</b>										
Ames, IA MSA	108	2.81	97.92	62.96	69.44	23.15	7.41	23.81	19.72	
Cass County, IA Non-Metro	230	5.98	99.18	73.04	68.70	20.00	11.30	67.11	68.52	
Crawford County, IA Non-Metro	374	9.73	99.15	62.83	63.64	22.99	13.37	94.00	98.08	
Fort Dodge, IA Non-Metro	480	12.48	98.83	50.00	57.92	31.88	10.21	18.52	12.70	
Iowa City, IA MSA	43	1.12	97.90	69.77	97.67	2.33	0.00	1.04	1.18	
Marion County, IA Non-Metro	184	4.79	99.10	59.78	79.35	15.76	4.89	39.83	29.21	
Marshalltown, IA Non-Metro	293	7.62	99.17	57.68	68.94	15.36	15.70	37.57	29.20	
Mason City, IA Non-Metro	388	10.09	99.28	56.19	49.23	29.90	20.88	23.56	17.23	
Ottumwa, IA Non-Metro	109	2.83	99.57	55.05	79.82	14.68	5.50	38.71	34.09	
Palo Alto County, IA Non-Metro	125	3.25	98.28	60.80	68.00	22.40	9.60	81.48	85.00	
Poweshiek County, IA Non-Metro	350	9.10	98.64	59.14	68.00	18.57	13.43	47.89	39.60	
Sioux City, IA MSA	104	2.70	98.29	52.88	59.62	26.92	13.46	33.87	28.21	
Waterloo-Cedar Falls, IA MSA	185	4.81	98.75	60.00	77.30	18.38	4.32	16.44	11.30	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 29.2% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: IOWA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Cedar Rapids, IA MSA	3	806	10	7,512	13	8,317	9.38	0	0
Des Moines-West Des Moines, IA MSA	11	9,279	85	44,252	96	53,531	60.37	0	0
<b>Limited Review:</b>									
Ames, IA MSA	0	0	4	9,582	4	9,582	10.81	0	0
Cass County, IA Non-Metro	0	0	0	0	0	0	0.00	0	0
Crawford County, IA Non-Metro	0	0	1	0	1	0	0.00	0	0
Fort Dodge, IA Non-Metro	1	736	5	70	6	806	0.91	0	0
Iowa City, IA MSA	3	1,002	5	3,102	8	4,104	4.63	0	0
Marion County, IA Non-Metro	1	4	3	60	4	64	0.07	0	0
Marshalltown, IA Non-Metro	0	0	3	1	3	1	0.00	0	0
Mason City, IA Non-Metro	1	37	1	2	2	40	0.04	0	0
Ottumwa, IA Non-Metro	2	300	2	1	4	302	0.34	0	0
Palo Alto County, IA Non-Metro	0	0	0	0	0	0	0.00	0	0
Poweshiek County, IA Non-Metro	0	0	0	0	0	0	0.00	0	0
Sioux City, IA MSA	4	1,939	6	921	10	2,860	3.23	0	0
Waterloo-Cedar Falls, IA MSA	2	1,795	6	6,946	8	8,742	9.86	0	0
<b>Statewide:</b>									
Iowa Statewide	2	210	1	114	3	324	0.36	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: IOWA				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Cedar Rapids, IA MSA	11.19	12	19.05	8.33	16.67	58.33	16.67	1	1	0	0	0	0	1.12	18.84	52.54	27.51		
Des Moines-West Des Moines, IA MSA	47.32	20	31.75	10.00	20.00	45.00	25.00	0	3	0	0	-3	0	4.62	22.34	44.14	28.90		
Limited Review:																			
Ames, IA MSA	2.49	3	4.76	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	7.88	6.61	67.74	12.04		
Cass County, IA Non-Metro	8.73	1	1.59	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	22.27	77.73	0.00		
Crawford County, IA Non-Metro	1.04	1	1.59	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00		
Fort Dodge, IA Non-Metro	3.74	5	7.94	20.00	0.00	40.00	40.00	0	0	0	0	0	0	2.40	18.45	58.49	20.66		
Iowa City, IA MSA	1.50	2	3.17	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	15.49	60.93	23.59		
Marion County, IA Non-Metro	1.71	3	4.76	0.00	66.67	0.00	33.33	0	0	0	0	0	0	0.00	6.02	40.31	53.67		
Marshalltown, IA Non-Metro	3.12	2	3.17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	22.70	77.30	0.00		
Mason City, IA Non-Metro	2.48	2	3.17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	79.96	20.04		
Ottumwa, IA Non-Metro	1.57	1	1.59	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	32.92	54.92	12.16		
Palo Alto County, IA Non-Metro	0.51	1	1.59	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00		
Poweshiek County, IA Non-Metro	1.01	2	3.17	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	21.79	33.61	44.60		
Sioux City, IA MSA	7.61	4	6.35	0.00	25.00	50.00	25.00	0	0	0	0	0	0	1.63	21.26	50.94	26.17		
Waterloo-Cedar Falls, IA MSA	5.98	4	6.35	25.00	0.00	75.00	0.00	0	1	0	0	-1	0	4.33	13.45	59.76	22.44		

**Table 1. Lending Volume**

LENDING VOLUME												Geography: KANSAS												Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011											
MA/Assessment Area:												% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***												
													#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)													
<b>Full Review:</b>																																			
Kansas City, KS MSA												69.14	13,442	2,488,123	810	32,678	12	509	0	0	14,264	2,521,311	56.83												
<b>Limited Review:</b>																																			
Atchison County, KS Non-Metro												0.64	113	13,023	18	465	2	60	0	0	133	13,548	2.91												
Wichita, KS MSA												30.22	5,727	744,696	492	17,931	15	200	0	0	6,234	762,827	40.25												

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: KANSAS								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Kansas City, KS MSA	4,559	66.08	1.18	0.24	13.70	5.37	39.59	36.65	45.54	57.73	19.76	37.50	19.43	21.33	18.81	
Limited Review:																
Atchison County, KS Non-Metro	20	0.29	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.17	0.00	0.00	14.17	0.00	
Wichita, KS MSA	2,320	33.63	1.09	0.26	18.00	11.85	54.42	49.27	26.49	38.62	16.08	9.52	16.80	15.91	16.18	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: KANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Kansas City, KS MSA	179	58.69	1.18	0.56	13.70	3.91	39.59	24.02	45.54	71.51	8.58	0.00	3.61	5.42	12.15
Limited Review:															
Atchison County, KS Non-Metro	4	1.31	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	18.18	0.00	0.00	18.18	0.00
Wichita, KS MSA	122	40.00	1.09	0.00	18.00	9.02	54.42	47.54	26.49	43.44	4.61	0.00	3.90	3.98	6.25

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Kansas City, KS MSA	8,699	72.06	1.18	0.07	13.70	2.55	39.59	28.33	45.54	69.05	16.90	7.69	14.32	17.60	16.74
Limited Review:															
Atchison County, KS Non-Metro	89	0.74	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	19.91	0.00	0.00	19.91	0.00
Wichita, KS MSA	3,284	27.20	1.09	0.15	18.00	7.55	54.42	47.20	26.49	45.10	14.54	10.71	15.47	14.25	14.71

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: KANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Kansas City, KS MSA	5	83.33	1.56	0.00	21.77	0.00	45.07	40.00	31.60	60.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
Atchison County, KS Non-Metro	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
Wichita, KS MSA	1	16.67	3.99	0.00	31.16	100.00	45.20	0.00	19.65	0.00	3.13	0.00	5.88	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses			Geography: KANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Kansas City, KS MSA	809	61.3	1.09	0.12	9.69	10.2	33.4	37.5	54.9	52.0	3.4	0.0	4.4	4.8	2.9
<b>Limited Review:</b>															
Atchison County, KS Non-Metro	18	1.3	0.00	0.00	0.00	0.00	100.0	100.0	0.00	0.00	7.2	0.0	0.0	7.3	0.0
Wichita, KS MSA	492	37.3	1.56	2.03	20.3	26.2	48.9	47.1	29.1	24.5	3.5	3.3	4.1	3.7	2.9

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms		Geography: KANSAS								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Kansas City, KS MSA	12	41.38	0.41	0.00	8.86	16.67	50.43	33.33	40.15	50.00	4.55	0.00	14.29	2.48	7.32	
Limited Review:																
Atchison County, KS Non-Metro	2	6.90	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	2.78	0.00	0.00	2.78	0.00	
Wichita, KS MSA	15	51.72	0.51	0.00	6.54	0.00	69.39	60.00	23.56	40.00	3.25	0.00	50.00	2.13	7.69	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE		Geography: KANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City, KS MSA	4,559	66.08	14.87	11.45	16.67	26.34	22.80	27.08	45.66	35.13	21.41	22.85	23.81	23.75	18.07
<b>Limited Review:</b>															
Atchison County, KS Non-Metro	20	0.29	18.96	6.67	19.57	33.33	28.22	13.33	33.26	46.67	11.54	8.33	9.76	8.70	17.86
Wichita, KS MSA	2,320	33.63	17.88	14.87	19.22	27.86	24.52	27.16	38.38	30.11	17.17	16.93	18.12	17.78	16.08

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.6% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: KANSAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City, KS MSA	179	58.69	14.87	5.71	16.67	19.43	22.80	22.29	45.66	52.57	8.88	6.85	10.12	7.80	9.27
<b>Limited Review:</b>															
Atchison County, KS Non-Metro	4	1.31	18.96	0.00	19.57	50.00	28.22	50.00	33.26	0.00	20.00	0.00	50.00	33.33	0.00
Wichita, KS MSA	122	40.00	17.88	9.17	19.22	15.83	24.52	27.50	38.38	47.50	4.67	3.27	3.21	5.48	5.24

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.0% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: KANSAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Kansas City, KS MSA	8,699	72.06	14.87	4.32	16.67	14.42	22.80	23.19	45.66	58.07	18.44	17.71	19.86	17.93	18.37
<b>Limited Review:</b>															
Atchison County, KS Non-Metro	89	0.74	18.96	3.66	19.57	10.98	28.22	29.27	33.26	56.10	21.91	10.00	5.26	25.45	26.19
Wichita, KS MSA	3,284	27.20	17.88	6.62	19.22	16.51	24.52	25.99	38.38	50.88	14.96	13.74	14.30	14.58	15.63

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 13.0% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: KANSAS			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Kansas City, KS MSA	810	61.36	66.14	71.60	96.42	1.85	1.73	3.48	5.95
<b>Limited Review:</b>									
Atchison County, KS Non-Metro	18	1.36	71.86	94.44	100.00	0.00	0.00	7.29	21.21
Wichita, KS MSA	492	37.27	67.28	64.43	97.76	1.83	0.41	3.55	6.42

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 13.1% 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: KANSAS			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*							
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less						
<b>Full Review:</b>															
Kansas City, KS MSA	12	41.38	97.16	100.00	100.00	0.00	0.00	4.55	5.56						
<b>Limited Review:</b>															
Atchison County, KS Non-Metro	2	6.90	98.97	100.00	100.00	0.00	0.00	2.78	3.23						
Wichita, KS MSA	15	51.72	98.16	73.33	100.00	0.00	0.00	3.25	3.02						

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 13.8% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: KANSAS		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Kansas City, KS MSA	0	0	11	7,919	11	7,919	62.68	0	0
<b>Limited Review:</b>									
Atchison County, KS Non-Metro	0	0	2	3	2	3	0.02	0	0
Wichita, KS MSA	1	1,092	9	3,482	10	4,574	36.20	0	0
<b>Statewide:</b>									
Kansas Statewide	0	0	1	139	1	139	1.10	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: KANSAS								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Kansas City, KS MSA	56.83	6	66.67	0.00	16.67	33.33	50.00	1	0	0	0	0	1	4.49	18.92	34.40	42.17
Limited Review:																	
Atchison County, KS Non-Metro	2.91	1	11.11	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Wichita, KS MSA	40.25	2	22.22	0.00	50.00	0.00	50.00	0	0	0	0	0	0	6.35	26.38	37.76	29.52

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MARYLAND								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Baltimore-Towson, MD MSA	63.99	41,276	10,396,744	6,053	301,908	39	1,237	8	30,983	47,376	10,730,871	68.87
<b>Limited Review:</b>												
Bethesda-Rockville-Frederick, MD MD	36.01	24,043	7,928,889	2,609	114,999	9	593	2	17,715	26,663	8,062,196	31.13

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MARYLAND						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore-Towson, MD MSA	14,627	64.97	4.55	2.53	16.09	13.58	42.83	46.83	36.52	37.05	22.77	24.29	23.75	23.52	21.47
Limited Review:															
Bethesda-Rockville-Frederick, MD MD	7,887	35.03	0.57	1.04	16.20	18.40	49.83	56.27	33.40	24.29	22.97	30.28	24.95	24.33	19.01

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geography: MARYLAND																Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*									
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp					
Full Review:																				
Baltimore-Towson, MD MSA	837	68.78	4.55	3.11	16.09	11.47	42.83	42.17	36.52	43.25	12.77	16.35	14.41	12.89	11.92					
Limited Review:																				
Bethesda-Rockville-Frederick, MD MD	380	31.22	0.57	0.53	16.20	11.32	49.83	47.89	33.40	40.26	15.65	28.57	13.61	15.33	16.74					

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Table 4: Geographic Distribution of Home Mortgage Refinance Loans															
Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: MARYLAND						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore-Towson, MD MSA	25,794	62.06	4.55	1.12	16.09	7.73	42.83	40.40	36.52	50.76	18.86	18.27	21.58	19.54	17.97
Limited Review:															
Bethesda-Rockville-Frederick, MD MD	15,766	37.94	0.57	0.40	16.20	11.42	49.83	46.79	33.40	41.39	17.53	21.82	18.68	18.38	16.39

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: MARYLAND				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baltimore-Towson, MD MSA	18	64.29	9.27	16.67	27.09	16.67	44.67	44.44	18.97	22.22	8.25	30.00	7.69	4.65	5.56
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	10	35.71	1.69	0.00	44.59	60.00	41.98	40.00	11.74	0.00	5.13	0.00	5.88	7.14	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

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

Geographic Distribution: Small Loans to Businesses				Geography: MARYLAND				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Baltimore-Towson, MD MSA	6,053	69.88	4.74	2.96	15.19	11.63	41.74	44.19	38.29	41.22	9.91	9.36	10.32	10.52	9.61
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	2,609	30.12	1.00	0.65	20.90	18.51	46.97	43.62	31.13	37.22	7.21	2.24	7.38	6.62	8.29

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: MARYLAND								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Baltimore-Towson, MD MSA	39	81.25	0.77	0.00	6.70	5.13	44.87	38.46	47.66	56.41	19.81	0.00	50.00	15.38	25.00	
Limited Review:																
Bethesda-Rockville-Frederick, MD MD	9	18.75	0.83	0.00	18.77	22.22	56.62	77.78	23.79	0.00	15.00	0.00	14.29	29.41	0.00	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Source Data - Dun and Bradstreet (2011).

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

Borrower Distribution: HOME PURCHASE			Geography: MARYLAND						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baltimore-Towson, MD MSA	14,627	64.97	20.46	10.71	17.74	26.24	22.48	26.70	39.33	36.36	23.52	21.70	23.30	24.68	23.47
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	7,887	35.03	18.47	16.67	19.10	24.90	23.46	26.03	38.97	32.40	24.59	26.83	23.89	25.67	23.20

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME IMPROVEMENT			Geography: MARYLAND						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Baltimore-Towson, MD MSA	837	68.78	20.46	11.11	17.74	21.59	22.48	26.14	39.33	41.16	12.44	11.46	12.05	13.58	12.29
<b>Limited Review:</b>															
Bethesda-Rockville-Frederick, MD MD	380	31.22	18.47	6.72	19.10	21.24	23.46	26.08	38.97	45.97	16.28	8.95	15.93	18.88	17.89

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchase by bank.

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

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

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MARYLAND						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Baltimore-Towson, MD MSA	25,794	62.06	20.46	5.46	17.74	15.56	22.48	24.46	39.33	54.51	19.64	17.62	19.43	20.10	19.76
Limited Review:															
Bethesda-Rockville-Frederick, MD MD	15,766	37.94	18.47	6.24	19.10	15.31	23.46	26.35	38.97	52.09	19.54	18.24	18.51	19.45	20.12

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 12.9% of loans originated and purchase by bank.

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

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

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MARYLAND			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Baltimore-Towson, MD MSA	6,053	69.88	66.15	55.96	92.58	4.56	2.86	9.91	13.06
<b>Limited Review:</b>									
Bethesda-Rockville-Frederick, MD MD	2,609	30.12	66.44	59.87	93.52	4.83	1.65	7.21	9.51

\* Based on 2011 Small Business Data (USPR)

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

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 24.6% of small loans to businesses originated and purchased by the bank.

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

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: MARYLAND				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Baltimore-Towson, MD MSA	39	81.25	96.29	97.44	97.44	2.56	0.00	19.81	30.88	
Limited Review:										
Bethesda-Rockville-Frederick, MD MD	9	18.75	95.77	22.22	66.67	33.33	0.00	15.00	5.26	

\* Based on 2011 Peer Small Business Data (USPR)

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

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 2.1% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MARYLAND		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Baltimore-Towson, MD MSA	8	29,719	97	24,447	105	54,167	77.85	0	0
<b>Limited Review:</b>									
Bethesda-Rockville-Frederick, MD MD	4	11,747	16	181	20	11,928	17.14	0	0
<b>Statewide:</b>									
Maryland Statewide	1	3,284	1	200	2	3,484	5.01	0	0

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

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

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

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MARYLAND								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Baltimore-Towson, MD MSA	68.87	53	74.65	7.55	20.75	43.40	28.30	0	0	0	0	0	0	10.61	20.58	35.55	32.73
Limited Review:																	
Bethesda-Rockville-Frederick, MD MD	31.13	18	25.35	0.00	55.56	27.78	16.67	0	0	0	0	0	0	6.10	28.33	37.49	28.08

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: MICHIGAN												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Northwestern MI Non-Metro	48.04	5,173	624,038	4,568	161,153	142	10,275	9	4,725	9,892	800,191	25.82
Limited Review:												
Grand Rapids-Wyoming, MI MSA	44.23	7,685	1,049,513	1,374	58,445	49	1,226	0	0	9,108	1,109,184	74.18
Traverse City, MI Non-Metro	7.73	1,223	223,863	360	11,419	9	298	0	0	1,592	235,580	0.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MICHIGAN								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Northwestern MI Non-Metro	1,355	25.35	0.00	0.00	12.13	13.06	82.35	79.26	5.53	7.68	23.19	0.00	26.26	22.68	25.33	
Limited Review:																
Grand Rapids-Wyoming, MI MSA	3,609	67.52	0.91	0.58	13.82	10.50	62.29	59.82	22.99	29.09	11.90	27.50	12.69	12.48	10.43	
Traverse City, MI Non-Metro	381	7.13	0.00	0.00	0.00	0.00	63.28	65.88	36.72	34.12	11.38	0.00	0.00	12.60	9.48	

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Northwestern MI Non-Metro	273	74.59	0.00	0.00	12.13	10.99	82.35	81.68	5.53	7.33	32.18	0.00	15.38	34.72	50.00
<b>Limited Review:</b>															
Grand Rapids-Wyoming, MI MSA	78	21.31	0.91	0.00	13.82	7.69	62.29	52.56	22.99	39.74	2.18	0.00	2.56	1.72	3.68
Traverse City, MI Non-Metro	15	4.10	0.00	0.00	0.00	0.00	63.28	73.33	36.72	26.67	11.43	0.00	0.00	9.52	14.29

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Northwestern MI Non-Metro	3,536	42.30	0.00	0.00	12.13	10.63	82.35	79.07	5.53	10.29	28.27	0.00	35.36	27.54	29.57
<b>Limited Review:</b>															
Grand Rapids-Wyoming, MI MSA	3,997	47.81	0.91	0.23	13.82	6.53	62.29	54.07	22.99	39.18	6.62	10.00	7.50	7.08	5.88
Traverse City, MI Non-Metro	827	9.89	0.00	0.00	0.00	0.00	63.28	54.05	36.72	45.95	7.64	0.00	0.00	6.81	8.74

\* Based on 2011 Peer Mortgage Data (USPR)

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

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

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

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Northwestern MI Non-Metro	9	90.00	0.00	0.00	23.67	22.22	75.55	77.78	0.78	0.00	28.57	0.00	0.00	40.00	0.00
<b>Limited Review:</b>															
Grand Rapids-Wyoming, MI MSA	1	10.00	0.79	0.00	19.41	0.00	68.73	100.00	11.07	0.00	0.00	0.00	0.00	0.00	0.00
Traverse City, MI Non-Metro	0	0.00	0.00	0.00	0.00	0.00	69.84	0.00	30.16	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

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

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Northwestern MI Non-Metro	4,568	72.48	0.00	0.00	15.21	15.52	79.76	79.23	4.88	5.25	36.94	0.00	36.54	39.42	42.64
<b>Limited Review:</b>															
Grand Rapids-Wyoming, MI MSA	1,374	21.80	1.76	2.11	14.81	12.52	56.00	56.70	27.43	28.68	2.57	2.04	2.99	2.83	2.13
Traverse City, MI Non-Metro	360	5.71	0.00	0.00	0.00	0.00	65.87	63.06	34.13	36.94	3.17	0.00	0.00	3.30	3.38

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Northwestern MI Non-Metro	142	71.00	0.00	0.00	9.11	7.75	87.48	88.03	3.23	4.23	63.64	0.00	100.00	61.54	100.00
Limited Review:															
Grand Rapids-Wyoming, MI MSA	49	24.50	0.25	0.00	6.21	12.24	72.48	73.47	21.07	14.29	7.64	0.00	16.67	6.90	9.09
Traverse City, MI Non-Metro	9	4.50	0.00	0.00	0.00	0.00	63.59	100.00	36.41	0.00	10.53	0.00	0.00	18.18	0.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Table 6: Borrower Distribution of Home Purchase Loans																
Borrower Distribution: HOME PURCHASE			Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*					
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp	
Full Review:																
Northwestern MI Non-Metro	1,355	25.35	19.52		9.07	21.00	21.32	23.43	26.82	36.05	42.79	22.04	18.81	16.22	23.44	25.26
Limited Review:																
Grand Rapids-Wyoming, MI MSA	3,609	67.52	18.17		20.48	18.95	30.69	24.57	22.24	38.30	26.58	11.34	12.09	12.43	10.91	10.27
Traverse City, MI Non-Metro	381	7.13	12.92		7.61	17.46	15.49	24.94	20.11	44.67	56.79	11.66	16.67	9.25	11.79	11.76

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Northwestern MI Non-Metro	273	74.59	19.52	8.30	21.00	18.49	23.43	27.92	36.05	45.28	31.88	21.43	28.57	32.50	35.21
<b>Limited Review:</b>															
Grand Rapids-Wyoming, MI MSA	78	21.31	18.17	5.33	18.95	25.33	24.57	24.00	38.30	45.33	1.90	0.00	2.55	1.28	2.87
Traverse City, MI Non-Metro	15	4.10	12.92	6.67	17.46	20.00	24.94	6.67	44.67	66.67	11.76	0.00	0.00	0.00	23.53

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: MICHIGAN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Northwestern MI Non-Metro	3,536	42.30	19.52	5.43	21.00	15.00	23.43	24.51	36.05	55.05	27.29	31.15	26.33	22.53	29.40
<b>Limited Review:</b>															
Grand Rapids-Wyoming, MI MSA	3,997	47.81	18.17	5.19	18.95	18.05	24.57	24.96	38.30	51.80	5.97	4.06	5.75	5.74	6.44
Traverse City, MI Non-Metro	827	9.89	12.92	2.36	17.46	10.93	24.94	19.05	44.67	67.65	7.29	5.95	3.28	7.36	8.06

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 17.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Table 11: Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MICHIGAN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Northwestern MI Non-Metro	4,568	72.48	69.06	67.95	94.88	3.46	1.66	36.94	44.51	
Limited Review:										
Grand Rapids-Wyoming, MI MSA	1,374	21.80	68.29	65.07	95.41	3.06	1.53	2.57	3.99	
Traverse City, MI Non-Metro	360	5.71	71.85	73.61	96.94	2.78	0.28	3.17	5.39	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 15.7% 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, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Northwestern MI Non-Metro	142	71.00	97.53	70.42	83.10	6.34	10.56	63.64	82.61	
Limited Review:										
Grand Rapids-Wyoming, MI MSA	49	24.50	96.90	71.43	100.00	0.00	0.00	7.64	8.51	
Traverse City, MI Non-Metro	9	4.50	97.69	100.00	100.00	0.00	0.00	10.53	20.00	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 5.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MICHIGAN		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Northwestern MI Non-Metro	8	1,976	23	11,083	31	13,059	60.75	0	0
<b>Limited Review:</b>									
Grand Rapids-Wyoming, MI MSA	4	2,663	7	77	11	2,740	12.75	0	0
Traverse City, MI Non-Metro	1	1,812	1	2	2	1,814	8.44	0	0
<b>Statewide:</b>									
Michigan Statewide	1	3,883	0	0	1	3,883	18.06	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MICHIGAN								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Northwestern MI Non-Metro	25.82	17	89.47	0.00	11.76	64.71	23.53	1	7	0	0	-7	1	0.00	5.63	74.91	19.45
Limited Review:																	
Grand Rapids-Wyoming, MI MSA	74.18	1	5.26	0.00	100.00	0.00	0.00	0	0	0	0	0	0	4.89	18.98	50.67	24.98
Traverse City, MI Non-Metro	0.00	1	5.26	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	4.98	57.17	37.85

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MINNESOTA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:													
Greater MN Non-Metro	55.62	34,864	5,236,397	17,930	715,536	4,217	414,884	11	18,960	57,022	6,385,777	58.30	
Limited Review:													
Duluth, MN MSA	13.87	7,646	1,119,478	6,466	230,235	103	2,712	3	500	14,218	1,352,925	14.27	
Mankato-North Mankato, MN MSA	7.58	5,198	804,180	2,390	113,900	167	15,234	14	18,085	7,769	951,399	5.34	
Northeastern MN Non-Metro	0.93	532	96,583	404	13,921	14	293	0	0	950	110,797	0.53	
Rochester, MN MSA	13.29	8,157	1,363,683	4,972	222,360	489	50,347	5	16,137	13,623	1,652,526	12.95	
St. Cloud, MN MSA	8.72	5,394	823,498	3,311	163,808	227	14,165	4	1,080	8,936	1,002,551	8.62	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MINNESOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater MN Non-Metro	10,088	54.20	0.22	0.00	6.11	4.54	82.47	76.44	11.20	19.02	24.15	0.00	21.64	23.47	28.40
<b>Limited Review:</b>															
Duluth, MN MSA	2,165	11.63	0.86	0.92	12.81	13.95	65.96	57.64	20.38	27.48	20.28	36.84	24.73	20.06	18.59
Mankato-North Mankato, MN MSA	1,581	8.49	0.00	0.00	9.52	10.82	89.24	74.00	1.24	15.18	32.26	0.00	32.62	31.64	48.28
Northeastern MN Non-Metro	101	0.54	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	19.38	0.00	0.00	19.38	0.00
Rochester, MN MSA	2,946	15.83	0.00	0.00	9.95	9.16	69.08	59.03	20.97	31.81	24.72	0.00	27.12	25.32	23.07
St. Cloud, MN MSA	1,732	9.31	0.00	0.00	7.89	7.04	73.68	64.20	18.43	28.75	23.66	0.00	26.90	22.42	26.35

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: MINNESOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater MN Non-Metro	1,499	61.51	0.22	0.00	6.11	4.20	82.47	81.65	11.20	14.14	20.13	0.00	17.53	19.64	25.27
<b>Limited Review:</b>															
Duluth, MN MSA	380	15.59	0.86	0.53	12.81	12.89	65.96	63.68	20.38	22.89	22.05	100.00	28.21	22.14	19.17
Mankato-North Mankato, MN MSA	118	4.84	0.00	0.00	9.52	5.08	89.24	84.75	1.24	10.17	25.83	0.00	18.75	26.92	0.00
Northeastern MN Non-Metro	27	1.11	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	35.00	0.00	0.00	35.00	0.00
Rochester, MN MSA	212	8.70	0.00	0.00	9.95	6.60	69.08	70.75	20.97	22.64	15.08	0.00	7.69	16.33	13.79
St. Cloud, MN MSA	201	8.25	0.00	0.00	7.89	2.49	73.68	68.66	18.43	28.86	19.38	0.00	9.52	14.81	40.91

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: MINNESOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater MN Non-Metro	23,248	57.14	0.22	0.00	6.11	3.85	82.47	76.54	11.20	19.61	25.49	0.00	20.82	24.01	35.20
<b>Limited Review:</b>															
Duluth, MN MSA	5,090	12.51	0.86	0.75	12.81	7.11	65.96	56.42	20.38	35.72	24.23	16.33	30.08	23.21	25.04
Mankato-North Mankato, MN MSA	3,492	8.58	0.00	0.00	9.52	9.02	89.24	81.16	1.24	9.82	37.93	0.00	40.10	37.17	51.39
Northeastern MN Non-Metro	404	0.99	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	21.08	0.00	0.00	21.08	0.00
Rochester, MN MSA	4,992	12.27	0.00	0.00	9.95	4.85	69.08	58.37	20.97	36.78	23.54	0.00	23.89	23.61	23.35
St. Cloud, MN MSA	3,458	8.50	0.00	0.06	7.89	3.93	73.68	66.02	18.43	29.99	20.57	16.67	21.02	20.49	20.72

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: MINNESOTA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Greater MN Non-Metro	29	50.88	0.04	0.00	9.09	0.00	79.85	75.86	11.02	24.14	3.64	0.00	0.00	5.00	0.00	
Limited Review:																
Duluth, MN MSA	11	19.30	24.32	0.00	25.27	36.36	40.24	54.55	10.17	9.09	4.55	0.00	0.00	7.14	0.00	
Mankato-North Mankato, MN MSA	7	12.28	0.00	0.00	22.96	0.00	75.13	85.71	1.90	14.29	18.75	0.00	0.00	21.43	0.00	
Northeastern MN Non-Metro	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	
Rochester, MN MSA	7	12.28	0.00	0.00	31.89	42.86	58.02	57.14	10.09	0.00	0.00	0.00	0.00	0.00	0.00	
St. Cloud, MN MSA	3	5.26	1.91	0.00	17.24	33.33	66.46	0.00	14.39	66.67	7.69	0.00	33.33	0.00	25.00	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: MINNESOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Greater MN Non-Metro	17,930	50.55	0.10	0.04	6.90	5.05	83.07	76.88	9.92	18.03	26.46	50.00	28.61	26.26	40.10
<b>Limited Review:</b>															
Duluth, MN MSA	6,466	18.23	8.64	11.60	12.24	12.57	60.77	53.57	18.35	22.25	45.02	43.88	41.24	47.14	46.88
Mankato-North Mankato, MN MSA	2,390	6.74	0.00	0.00	11.99	10.92	86.67	76.82	1.34	12.26	34.97	0.00	30.45	36.82	34.38
Northeastern MN Non-Metro	404	1.14	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	42.80	0.00	0.00	47.35	0.00
Rochester, MN MSA	4,971	14.01	0.00	0.00	13.17	15.53	65.22	53.75	21.46	30.72	43.00	0.00	48.13	42.03	45.23
St. Cloud, MN MSA	3,311	9.33	2.63	2.69	8.90	10.12	69.74	63.33	18.73	23.86	26.49	42.15	31.49	25.34	30.85

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: MINNESOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Greater MN Non-Metro	4,217	80.83	0.02	0.12	3.67	1.85	87.16	84.61	9.16	13.42	24.99	100.00	14.41	23.85	52.19
<b>Limited Review:</b>															
Duluth, MN MSA	103	1.97	3.44	0.00	5.08	3.88	72.46	81.55	19.02	14.56	82.76	0.00	100.00	95.24	50.00
Mankato-North Mankato, MN MSA	167	3.20	0.00	0.00	3.17	4.19	96.61	81.44	0.22	14.37	38.04	0.00	50.00	39.76	0.00
Northeastern MN Non-Metro	14	0.27	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	83.33	0.00	0.00	83.33	0.00
Rochester, MN MSA	489	9.37	0.00	0.00	2.85	0.00	88.13	91.21	9.02	8.79	73.28	0.00	0.00	76.52	66.67
St. Cloud, MN MSA	227	4.35	0.17	0.00	11.33	3.08	81.40	91.19	7.11	5.73	17.13	0.00	8.33	17.04	50.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: MINNESOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater MN Non-Metro	10,088	54.20	17.53	12.56	19.49	26.56	25.76	25.28	37.23	35.59	24.77	23.90	24.59	24.38	25.59
<b>Limited Review:</b>															
Duluth, MN MSA	2,165	11.63	18.14	12.33	18.58	26.68	23.82	25.00	39.46	35.99	20.79	19.66	19.77	23.99	19.54
Mankato-North Mankato, MN MSA	1,581	8.49	13.51	14.17	15.70	30.34	25.03	27.68	45.76	27.81	33.79	28.57	38.37	33.93	32.17
Northeastern MN Non-Metro	101	0.54	15.83	5.15	19.05	18.56	26.31	23.71	38.81	52.58	20.00	11.76	19.23	24.24	20.45
Rochester, MN MSA	2,946	15.83	16.18	23.04	19.22	32.91	27.41	21.51	37.18	22.54	25.74	29.40	26.68	25.45	21.42
St. Cloud, MN MSA	1,732	9.31	16.15	20.64	19.14	30.93	27.52	26.33	37.19	22.09	24.51	24.01	26.47	25.17	21.81

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: MINNESOTA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater MN Non-Metro	1,499	61.51	17.53	6.63	19.49	20.38	25.76	27.36	37.23	45.62	19.80	14.47	20.57	21.88	19.38
<b>Limited Review:</b>															
Duluth, MN MSA	380	15.59	18.14	10.16	18.58	20.86	23.82	24.87	39.46	44.12	22.41	25.71	19.57	22.12	23.37
Mankato-North Mankato, MN MSA	118	4.84	13.51	5.13	15.70	22.22	25.03	27.35	45.76	45.30	27.93	26.67	22.22	29.73	31.25
Northeastern MN Non-Metro	27	1.11	15.83	3.70	19.05	22.22	26.31	18.52	38.81	55.56	36.84	0.00	25.00	50.00	37.50
Rochester, MN MSA	212	8.70	16.18	16.83	19.22	25.48	27.41	26.92	37.18	30.77	14.81	20.69	21.52	10.00	11.29
St. Cloud, MN MSA	201	8.25	16.15	9.84	19.14	20.73	27.52	31.09	37.19	38.34	18.60	12.50	9.09	28.79	19.35

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MINNESOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater MN Non-Metro	23,248	57.14	17.53	4.82	19.49	15.37	25.76	25.85	37.23	53.96	26.95	23.86	24.77	26.93	28.11
<b>Limited Review:</b>															
Duluth, MN MSA	5,090	12.51	18.14	5.27	18.58	16.35	23.82	26.33	39.46	52.06	25.70	22.22	23.46	24.80	27.63
Mankato-North Mankato, MN MSA	3,492	8.58	13.51	5.70	15.70	19.04	25.03	28.88	45.76	46.39	38.11	31.01	33.15	39.49	40.94
Northeastern MN Non-Metro	404	0.99	15.83	4.66	19.05	14.52	26.31	18.90	38.81	61.92	22.57	12.50	22.64	25.33	22.29
Rochester, MN MSA	4,992	12.27	16.18	8.47	19.22	20.74	27.41	25.48	37.18	45.32	23.49	25.00	21.95	23.13	24.11
St. Cloud, MN MSA	3,458	8.50	16.15	6.90	19.14	19.92	27.52	32.03	37.19	41.15	20.74	17.14	18.44	22.07	22.01

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 9.3% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES										Geography: MINNESOTA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*								
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev \$ 1 Million or Less							
<b>Full Review:</b>																
Greater MN Non-Metro	17,930	50.55	73.29	74.87	94.85	2.77	2.38	26.46	39.37							
<b>Limited Review:</b>																
Duluth, MN MSA	6,466	18.23	70.38	75.29	95.90	2.12	1.98	45.02	61.22							
Mankato-North Mankato, MN MSA	2,390	6.74	69.12	69.21	93.68	2.97	3.35	34.97	48.47							
Northeastern MN Non-Metro	404	1.14	72.96	84.16	95.79	1.24	2.97	42.80	60.27							
Rochester, MN MSA	4,972	14.02	71.87	69.85	93.52	3.84	2.63	43.00	55.35							
St. Cloud, MN MSA	3,311	9.33	71.23	69.25	92.63	3.71	3.65	26.49	38.92							

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.1% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: MINNESOTA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Greater MN Non-Metro	4,217	80.83	98.74	68.46	69.98	21.01	9.01	24.99	23.41
Limited Review:									
Duluth, MN MSA	103	1.97	99.02	91.26	100.00	0.00	0.00	82.76	91.67
Mankato-North Mankato, MN MSA	167	3.20	98.36	61.68	74.85	16.77	8.38	38.04	37.78
Northeastern MN Non-Metro	14	0.27	98.33	71.43	100.00	0.00	0.00	83.33	80.00
Rochester, MN MSA	489	9.37	98.10	64.21	70.14	19.84	10.02	73.28	70.73
St. Cloud, MN MSA	227	4.35	98.45	78.41	87.22	9.69	3.08	17.13	22.34

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 19.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MINNESOTA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Greater MN Non-Metro	18	10,275	45	33,412	63	43,687	46.04	0	0
<b>Limited Review:</b>									
Duluth, MN MSA	8	12,133	17	445	25	12,577	13.25	0	0
Mankato-North Mankato, MN MSA	3	967	4	9,169	7	10,136	10.68	1	211
Northeastern MN Non-Metro	0	0	0	0	0	0	0.00	0	0
Rochester, MN MSA	6	2,842	3	7,351	9	10,193	10.74	0	0
St. Cloud, MN MSA	7	4,347	7	529	14	4,876	5.14	0	0
<b>Statewide:</b>									
Minnesota Statewide	9	13,424	0	0	9	13,424	14.15	1	22

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MINNESOTA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Greater MN Non-Metro	58.30	35	53.03	2.86	22.86	68.57	5.71	0	4	0	-2	-2	0	0.38	10.73	77.72	11.17
Limited Review:																	
Duluth, MN MSA	14.27	13	19.70	7.69	7.69	76.92	7.69	0	0	0	0	0	0	6.98	12.69	58.07	22.26
Mankato-North Mankato, MN MSA	5.34	4	6.06	0.00	0.00	100.00	0.00	1	0	0	0	1	0	0.00	9.04	78.52	12.43
Northeastern MN Non-Metro	0.53	2	3.03	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Rochester, MN MSA	12.95	7	10.61	0.00	14.29	71.43	14.29	0	0	0	0	0	0	0.00	19.56	55.17	25.26
St. Cloud, MN MSA	8.62	5	7.58	0.00	20.00	40.00	40.00	0	0	0	0	0	0	0.00	16.74	74.67	8.60

**Table 1. Lending Volume**

Table 1: Lending Volume

LENDING VOLUME		Geography: MISSISSIPPI						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Gulfport-Biloxi, MS MSA	20.56	1,529	228,870	186	8,761	2	10	1	12,000	1,718	249,641	27.87
Jackson, MS MSA	54.84	4,268	845,957	307	13,026	7	143	1	5,456	4,583	864,583	37.72
Limited Review:												
Hattiesburg, MS MSA	12.72	960	156,955	100	4,381	3	107	0	0	1,063	161,443	22.12
Pascagoula, MS MSA	11.88	834	148,886	157	5,836	2	12	0	0	993	154,734	12.28

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MISSISSIPPI								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Gulfport-Biloxi, MS MSA	727	22.99	0.00	0.00	9.28	4.13	74.62	76.07	16.10	19.81	17.65	0.00	16.79	18.03	16.26	
Jackson, MS MSA	1,685	53.29	3.86	0.30	22.94	6.05	37.76	31.99	35.43	61.66	14.99	12.50	14.29	13.37	16.20	
Limited Review:																
Hattiesburg, MS MSA	381	12.05	3.42	0.26	13.33	5.25	49.31	35.70	33.94	58.79	13.69	14.29	8.65	12.95	14.89	
Pascagoula, MS MSA	369	11.67	0.02	0.00	12.83	5.69	72.18	75.61	14.97	18.70	14.41	0.00	17.07	14.82	12.11	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Gulfport-Biloxi, MS MSA	33	25.58	0.00	0.00	9.28	0.00	74.62	78.79	16.10	21.21	3.86	0.00	0.00	4.01	5.45
Jackson, MS MSA	61	47.29	3.86	3.28	22.94	13.11	37.76	29.51	35.43	54.10	4.30	0.00	2.64	3.18	7.42
<b>Limited Review:</b>															
Hattiesburg, MS MSA	16	12.40	3.42	0.00	13.33	6.25	49.31	37.50	33.94	56.25	4.02	0.00	0.00	2.63	7.14
Pascagoula, MS MSA	19	14.73	0.02	0.00	12.83	5.26	72.18	68.42	14.97	26.32	2.69	0.00	0.00	2.51	7.69

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Gulfport-Biloxi, MS MSA	768	17.91	0.00	0.00	9.28	2.99	74.62	75.78	16.10	21.22	13.80	0.00	5.74	14.23	13.82
Jackson, MS MSA	2,514	58.64	3.86	0.64	22.94	4.34	37.76	30.79	35.43	64.24	14.50	11.11	11.28	13.51	15.42
<b>Limited Review:</b>															
Hattiesburg, MS MSA	562	13.11	3.42	0.18	13.33	5.16	49.31	33.45	33.94	61.21	14.60	4.76	10.53	12.20	17.10
Pascagoula, MS MSA	443	10.33	0.02	0.00	12.83	4.06	72.18	68.17	14.97	27.77	11.19	0.00	6.45	10.75	14.39

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: MISSISSIPPI								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Gulfport-Biloxi, MS MSA	1	7.69	0.00	0.00	18.98	0.00	61.15	100.00	19.88	0.00	0.00	0.00	0.00	0.00	0.00	
Jackson, MS MSA	8	61.54	10.23	0.00	36.42	25.00	28.08	0.00	25.26	75.00	8.57	0.00	0.00	0.00	17.65	
Limited Review:																
Hattiesburg, MS MSA	1	7.69	12.62	0.00	29.92	0.00	29.62	0.00	27.84	100.00	0.00	0.00	0.00	0.00	0.00	
Pascagoula, MS MSA	3	23.08	0.00	0.00	28.51	0.00	47.25	33.33	24.24	66.67	14.29	0.00	0.00	0.00	28.57	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Gulfport-Biloxi, MS MSA	183	24.50	0.00	0.00	14.44	13.11	69.70	72.68	14.43	14.21	4.54	0.00	3.38	4.44	4.49
Jackson, MS MSA	307	41.10	6.83	5.86	23.35	14.98	33.85	34.85	35.97	44.30	2.22	3.99	1.98	2.32	2.15
<b>Limited Review:</b>															
Hattiesburg, MS MSA	100	13.39	5.88	4.00	13.06	16.00	40.72	27.00	40.34	53.00	3.15	6.93	4.83	2.40	3.23
Pascagoula, MS MSA	157	21.02	0.00	0.00	18.22	28.03	63.86	38.85	17.92	33.12	7.90	0.00	11.37	6.08	9.37

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: MISSISSIPPI								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Gulfport-Biloxi, MS MSA	2	14.29	0.00	0.00	8.24	0.00	81.32	100.00	10.07	0.00	6.67	0.00	0.00	11.11	0.00	
Jackson, MS MSA	7	50.00	2.21	0.00	17.46	0.00	48.16	100.00	32.17	0.00	0.92	0.00	0.00	1.80	0.00	
Limited Review:																
Hattiesburg, MS MSA	3	21.43	2.19	0.00	9.69	0.00	49.69	66.67	38.44	33.33	2.41	0.00	0.00	3.39	0.00	
Pascagoula, MS MSA	2	14.29	0.00	0.00	8.15	0.00	78.15	100.00	13.70	0.00	25.00	0.00	0.00	50.00	0.00	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: MISSISSIPPI						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Gulfport-Biloxi, MS MSA	727	22.99	20.56	3.23	17.60	18.58	22.27	32.31	39.57	45.88	17.05	7.93	15.05	21.44	16.92
Jackson, MS MSA	1,685	53.29	23.29	9.30	16.35	21.08	19.29	24.10	41.07	45.52	17.20	17.60	15.20	17.55	18.10
<b>Limited Review:</b>															
Hattiesburg, MS MSA	381	12.05	23.13	3.34	15.77	15.60	20.95	24.79	40.15	56.27	15.00	5.80	15.11	15.59	15.55
Pascagoula, MS MSA	369	11.67	19.17	7.12	18.56	26.32	23.07	29.10	39.20	37.46	15.28	13.21	18.86	16.33	12.58

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 11.6% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Gulfport-Biloxi, MS MSA	33	25.58	20.56	9.09	17.60	15.15	22.27	24.24	39.57	51.52	4.14	0.00	5.26	5.05	4.23
Jackson, MS MSA	61	47.29	23.29	10.34	16.35	18.97	19.29	27.59	41.07	43.10	4.66	2.24	4.47	5.00	5.81
<b>Limited Review:</b>															
Hattiesburg, MS MSA	16	12.40	23.13	6.25	15.77	18.75	20.95	12.50	40.15	62.50	4.50	0.00	3.23	2.27	6.60
Pascagoula, MS MSA	19	14.73	19.17	0.00	18.56	5.88	23.07	41.18	39.20	52.94	2.28	0.00	1.05	2.41	4.59

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Table 10: Borrower Distribution of Home Mortgage Refinance Loans															
Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MISSISSIPPI						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Gulfport-Biloxi, MS MSA	768	17.91	20.56	3.19	17.60	13.78	22.27	21.18	39.57	61.85	13.27	5.60	13.99	14.95	13.24
Jackson, MS MSA	2,514	58.64	23.29	2.75	16.35	11.73	19.29	20.08	41.07	65.44	16.54	11.32	16.61	15.48	17.24
Limited Review:															
Hattiesburg, MS MSA	562	13.11	23.13	3.80	15.77	7.60	20.95	18.44	40.15	70.15	17.05	15.73	14.53	14.85	18.25
Pascagoula, MS MSA	443	10.33	19.17	5.56	18.56	13.45	23.07	19.01	39.20	61.99	10.66	8.08	9.41	9.94	11.65

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 13.4% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: MISSISSIPPI				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Gulfport-Biloxi, MS MSA	186	24.80	68.16	67.74	91.94	4.84	3.23	4.54	6.85	
Jackson, MS MSA	307	40.93	68.12	69.71	94.46	4.23	1.30	2.22	3.63	
Limited Review:										
Hattiesburg, MS MSA	100	13.33	69.67	67.00	94.00	3.00	3.00	3.15	4.39	
Pascagoula, MS MSA	157	20.93	70.86	62.42	94.90	3.82	1.27	7.90	12.09	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.7% 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: MISSISSIPPI			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*							
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less						
<b>Full Review:</b>															
Gulfport-Biloxi, MS MSA	2	14.29	97.25	100.00	100.00	0.00	0.00	6.67	12.50						
Jackson, MS MSA	7	50.00	97.53	71.43	100.00	0.00	0.00	0.92	0.77						
<b>Limited Review:</b>															
Hattiesburg, MS MSA	3	21.43	96.88	66.67	100.00	0.00	0.00	2.41	1.43						
Pascagoula, MS MSA	2	14.29	96.67	50.00	100.00	0.00	0.00	25.00	0.00						

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 14.3% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MISSISSIPPI		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Gulfport-Biloxi, MS MSA	0	0	6	6,335	6	6,335	65.27	0	0
Jackson, MS MSA	0	0	9	1,746	9	1,746	17.98	0	0
<b>Limited Review:</b>									
Hattiesburg, MS MSA	1	33	2	1,353	3	1,387	14.29	0	0
Pascagoula, MS MSA	1	118	1	121	2	239	2.47	0	0
<b>Statewide:</b>									
Mississippi Statewide	0	0	0	0	0	0	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MISSISSIPPI																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
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>																	
Gulfport-Biloxi, MS MSA	27.87	3	25.00	33.33	33.33	33.33	0.00	0	0	0	0	0	0	1.96	13.86	63.35	20.80
Jackson, MS MSA	37.72	4	33.33	25.00	0.00	50.00	25.00	0	0	0	0	0	0	10.17	18.67	41.66	29.50
<b>Limited Review:</b>																	
Hattiesburg, MS MSA	22.12	2	16.67	0.00	50.00	0.00	50.00	0	0	0	0	0	0	10.03	22.48	34.13	33.37
Pascagoula, MS MSA	12.28	3	25.00	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.81	12.86	65.55	20.78

**Table 1. Lending Volume**

LENDING VOLUME		Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Billings, MT MSA	19.31	5,409	923,856	2,250	109,808	163	16,371	7	3,473	7,829	1,053,508	22.77
Greater MT Non-Metro	54.32	13,408	2,524,757	7,444	285,143	1,168	94,678	8	5,985	22,028	2,910,563	50.07
Limited Review:												
Eastern MT Non-Metro	2.46	400	44,401	307	12,651	291	26,878	0	0	998	83,930	6.41
Fallon County, MT Non-Metro	0.53	125	14,248	61	4,713	29	1,843	0	0	215	20,804	1.50
Great Falls, MT MSA	11.52	3,298	503,296	1,286	66,458	85	6,224	4	2,356	4,673	578,334	10.87
Mineral County, MT Non-Metro	0.48	104	16,672	88	2,930	1	3	0	0	193	19,604	0.63
Missoula, MT MSA	11.38	3,443	676,675	1,166	42,829	6	104	1	6,737	4,616	726,344	7.75

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Billings, MT MSA	1,836	23.73	1.47	0.76	11.90	12.25	68.21	66.67	18.41	20.32	15.25	12.00	14.61	14.84	17.24
Greater MT Non-Metro	3,787	48.94	0.00	0.00	4.79	3.35	64.83	56.51	30.38	40.14	23.50	0.00	27.21	23.70	22.94
<b>Limited Review:</b>															
Eastern MT Non-Metro	126	1.63	0.00	0.00	4.34	1.59	95.66	98.41	0.00	0.00	12.73	0.00	50.00	12.45	0.00
Fallon County, MT Non-Metro	45	0.58	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	50.00	0.00	0.00	50.00	0.00
Great Falls, MT MSA	973	12.57	0.11	0.41	11.87	14.18	72.01	67.93	16.02	17.47	18.79	60.00	18.09	18.88	18.10
Mineral County, MT Non-Metro	25	0.32	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	23.53	0.00	0.00	23.53	0.00
Missoula, MT MSA	946	12.23	0.00	0.00	13.67	21.04	72.98	65.75	13.35	13.21	14.99	0.00	15.05	14.96	15.05

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: MONTANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Billings, MT MSA	216	18.15	1.47	0.93	11.90	7.87	68.21	71.30	18.41	19.91	12.47	9.09	7.89	12.50	14.77
Greater MT Non-Metro	688	57.82	0.00	0.00	4.79	1.74	64.83	58.43	30.38	39.83	29.72	0.00	10.53	31.10	29.81
<b>Limited Review:</b>															
Eastern MT Non-Metro	52	4.37	0.00	0.00	4.34	0.00	95.66	100.00	0.00	0.00	45.71	0.00	0.00	45.71	0.00
Fallon County, MT Non-Metro	16	1.34	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00
Great Falls, MT MSA	129	10.84	0.11	0.00	11.87	8.53	72.01	70.54	16.02	20.93	8.17	0.00	2.27	8.78	8.99
Mineral County, MT Non-Metro	8	0.67	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
Missoula, MT MSA	81	6.81	0.00	0.00	13.67	12.35	72.98	79.01	13.35	8.64	9.34	0.00	5.56	10.34	5.26

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Billings, MT MSA	3,348	19.42	1.47	0.69	11.90	7.80	68.21	68.13	18.41	23.39	17.49	6.98	17.52	17.18	18.94
Greater MT Non-Metro	8,925	51.78	0.00	0.00	4.79	2.12	64.83	59.25	30.38	38.63	26.23	0.00	27.12	26.06	26.43
<b>Limited Review:</b>															
Eastern MT Non-Metro	222	1.29	0.00	0.00	4.34	0.45	95.66	99.55	0.00	0.00	23.61	0.00	0.00	23.71	0.00
Fallon County, MT Non-Metro	64	0.37	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	66.67	0.00	0.00	66.67	0.00
Great Falls, MT MSA	2,190	12.71	0.11	0.00	11.87	8.22	72.01	69.22	16.02	22.56	24.93	0.00	20.73	24.26	28.81
Mineral County, MT Non-Metro	71	0.41	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	19.15	0.00	0.00	19.15	0.00
Missoula, MT MSA	2,416	14.02	0.00	0.00	13.67	11.59	72.98	72.56	13.35	15.85	19.54	0.00	19.89	19.43	19.71

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: MONTANA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Billings, MT MSA	9	39.13	5.83	0.00	16.94	0.00	62.92	77.78	14.31	22.22	7.41	0.00	0.00	5.26	50.00
Greater MT Non-Metro	8	34.78	0.00	0.00	15.50	25.00	56.12	37.50	28.37	37.50	18.18	0.00	66.67	0.00	0.00
<b>Limited Review:</b>															
Eastern MT Non-Metro	0	0.00	0.00	0.00	1.03	0.00	98.97	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Fallon County, MT Non-Metro	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
Great Falls, MT MSA	6	26.09	11.78	0.00	31.62	33.33	53.79	66.67	2.81	0.00	12.50	0.00	11.11	16.67	0.00
Mineral County, MT Non-Metro	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
Missoula, MT MSA	0	0.00	0.00	0.00	36.83	0.00	50.11	0.00	13.06	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses			Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Billings, MT MSA	2,250	17.85	2.84	1.96	11.33	11.78	71.74	70.62	14.09	15.64	15.90	11.54	10.22	17.39	17.49
Greater MT Non-Metro	7,444	59.07	0.00	0.01	5.52	6.89	61.61	56.34	32.87	36.75	19.49	100.00	27.54	20.59	18.90
<b>Limited Review:</b>															
Eastern MT Non-Metro	307	2.44	0.00	0.00	5.39	0.65	94.61	99.35	0.00	0.00	17.11	0.00	14.29	19.00	0.00
Fallon County, MT Non-Metro	61	0.48	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	39.32	0.00	0.00	41.82	0.00
Great Falls, MT MSA	1,286	10.20	8.24	7.23	17.25	19.28	61.58	59.95	12.94	13.53	23.32	19.83	32.75	22.22	20.49
Mineral County, MT Non-Metro	88	0.70	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	40.00	0.00	0.00	44.94	0.00
Missoula, MT MSA	1,166	9.25	0.00	0.00	30.86	28.64	60.64	61.15	8.50	10.21	12.00	0.00	12.27	12.36	12.16

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: MONTANA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Billings, MT MSA	163	9.35	2.84	0.00	11.02	6.75	77.95	71.17	8.18	22.09	14.33	0.00	2.17	14.33	40.91	
Greater MT Non-Metro	1,168	67.01	0.02	0.00	4.93	2.74	77.03	90.84	18.01	6.42	25.39	0.00	6.94	27.20	29.17	
Limited Review:																
Eastern MT Non-Metro	291	16.70	0.00	0.00	11.50	12.71	88.50	87.29	0.00	0.00	28.62	0.00	75.00	27.38	0.00	
Fallon County, MT Non-Metro	29	1.66	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.33	0.00	0.00	13.33	0.00	
Great Falls, MT MSA	85	4.88	2.79	9.41	5.40	0.00	82.75	89.41	9.06	1.18	18.85	100.00	50.00	17.59	0.00	
Mineral County, MT Non-Metro	1	0.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00	
Missoula, MT MSA	6	0.34	0.00	0.00	17.76	16.67	72.81	83.33	9.43	0.00	19.05	0.00	100.00	16.67	0.00	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Billings, MT MSA	1,836	23.73	19.36	6.97	18.21	24.41	23.59	30.17	38.84	38.46	16.10	15.51	13.93	14.99	18.75
Greater MT Non-Metro	3,787	48.94	16.89	4.98	17.30	16.44	23.27	27.70	42.54	50.88	26.02	25.91	24.26	25.40	27.38
<b>Limited Review:</b>															
Eastern MT Non-Metro	126	1.63	17.89	4.31	19.55	17.24	24.99	32.76	37.57	45.69	14.35	0.00	8.33	21.43	13.27
Fallon County, MT Non-Metro	45	0.58	20.98	2.27	19.10	11.36	23.12	31.82	36.81	54.55	54.17	50.00	33.33	40.00	72.73
Great Falls, MT MSA	973	12.57	18.42	7.33	18.98	21.36	24.09	30.71	38.51	40.60	20.11	18.68	17.31	22.32	20.60
Mineral County, MT Non-Metro	25	0.32	24.28	8.70	23.08	34.78	23.18	13.04	29.46	43.48	20.00	0.00	20.00	20.00	23.53
Missoula, MT MSA	946	12.23	19.20	4.08	18.95	21.16	22.65	30.40	39.20	44.36	16.76	18.87	19.25	16.51	15.68

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Billings, MT MSA	216	18.15	19.36	6.19	18.21	17.14	23.59	28.57	38.84	48.10	12.50	5.71	9.89	12.22	15.79
Greater MT Non-Metro	688	57.82	16.89	4.85	17.30	14.24	23.27	24.67	42.54	56.24	30.73	25.81	31.08	31.00	31.22
<b>Limited Review:</b>															
Eastern MT Non-Metro	52	4.37	17.89	2.04	19.55	10.20	24.99	28.57	37.57	59.18	42.42	0.00	33.33	50.00	40.00
Fallon County, MT Non-Metro	16	1.34	20.98	6.25	19.10	0.00	23.12	12.50	36.81	81.25	100.00	0.00	0.00	100.00	100.00
Great Falls, MT MSA	129	10.84	18.42	4.72	18.98	19.69	24.09	25.98	38.51	49.61	8.03	8.11	8.82	9.35	6.84
Mineral County, MT Non-Metro	8	0.67	24.28	12.50	23.08	25.00	23.18	37.50	29.46	25.00	0.00	0.00	0.00	0.00	0.00
Missoula, MT MSA	81	6.81	19.20	7.50	18.95	18.75	22.65	31.25	39.20	42.50	9.36	7.14	10.53	7.84	10.29

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.6% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Table 16: Borrower Distribution of Home Mortgage Refinance Loans															
Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: MONTANA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Billings, MT MSA	3,348	19.42	19.36	4.81	18.21	17.95	23.59	26.76	38.84	50.48	18.61	14.91	19.94	17.41	19.28
Greater MT Non-Metro	8,925	51.78	16.89	2.84	17.30	12.48	23.27	25.72	42.54	58.96	29.46	25.26	27.71	29.82	30.10
Limited Review:															
Eastern MT Non-Metro	222	1.29	17.89	4.90	19.55	10.78	24.99	27.94	37.57	56.37	30.06	28.57	18.18	31.11	32.32
Fallon County, MT Non-Metro	64	0.37	20.98	1.61	19.10	14.52	23.12	24.19	36.81	59.68	76.92	0.00	100.00	57.14	78.57
Great Falls, MT MSA	2,190	12.71	18.42	4.27	18.98	13.56	24.09	25.89	38.51	56.27	24.83	18.68	19.85	23.97	27.54
Mineral County, MT Non-Metro	71	0.41	24.28	8.06	23.08	12.90	23.18	33.87	29.46	45.16	18.92	20.00	14.29	0.00	29.41
Missoula, MT MSA	2,416	14.02	19.20	3.56	18.95	15.62	22.65	28.26	39.20	52.57	21.04	17.80	18.86	23.20	20.95

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 10.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Table 11: Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: MONTANA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Billings, MT MSA	2,250	17.85	67.95	75.24	92.58	3.82	3.60	15.90	23.72	
Greater MT Non-Metro	7,444	59.07	69.79	77.47	94.80	2.93	2.27	19.49	28.35	
Limited Review:										
Eastern MT Non-Metro	307	2.44	66.61	70.03	93.81	3.91	2.28	17.11	23.02	
Fallon County, MT Non-Metro	61	0.48	58.37	68.85	78.69	14.75	6.56	39.32	61.70	
Great Falls, MT MSA	1,286	10.20	68.51	68.35	91.68	4.51	3.81	23.32	30.81	
Mineral County, MT Non-Metro	88	0.70	69.75	88.64	93.18	6.82	0.00	40.00	53.13	
Missoula, MT MSA	1,166	9.25	68.28	82.33	96.23	1.80	1.97	12.00	18.43	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.3% 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: MONTANA									
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011									
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Billings, MT MSA	163	9.35	97.95	71.17	76.69	11.04	12.27	14.33	14.61
Greater MT Non-Metro	1,168	67.01	98.59	71.40	74.91	20.80	4.28	25.39	23.11
<b>Limited Review:</b>									
Eastern MT Non-Metro	291	16.70	99.56	63.92	71.13	23.71	5.15	28.62	22.55
Fallon County, MT Non-Metro	29	1.66	99.00	82.76	75.86	24.14	0.00	13.33	11.11
Great Falls, MT MSA	85	4.88	97.56	49.41	87.06	7.06	5.88	18.85	13.27
Mineral County, MT Non-Metro	1	0.06	100.00	100.00	100.00	0.00	0.00	100.00	0.00
Missoula, MT MSA	6	0.34	98.46	100.00	100.00	0.00	0.00	19.05	25.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2011).

\*\*\*\* 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 23.7% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: MONTANA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Billings, MT MSA	2	1,886	18	27,600	20	29,486	51.45	1	69
Greater MT Non-Metro	14	6,484	23	20,059	37	26,544	46.31	0	0
<b>Limited Review:</b>									
Eastern MT Non-Metro	0	0	1	2	1	2	0.00	0	0
Fallon County, MT Non-Metro	0	0	0	0	0	0	0.00	0	0
Great Falls, MT MSA	0	0	7	16	7	16	0.03	0	0
Mineral County, MT Non-Metro	0	0	2	104	2	104	0.18	0	0
Missoula, MT MSA	2	316	11	598	13	913	1.59	1	19
<b>Statewide:</b>									
Montana Statewide	0	0	1	250	1	250	0.44	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: MONTANA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
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>																	
Billings, MT MSA	22.77	8	17.78	0.00	12.50	75.00	12.50	0	0	0	0	0	0	2.37	11.61	67.09	18.93
Greater MT Non-Metro	50.07	24	53.33	0.00	25.00	66.67	8.33	0	0	0	0	0	0	1.35	13.23	63.52	21.74
<b>Limited Review:</b>																	
Eastern MT Non-Metro	6.41	3	6.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Fallon County, MT Non-Metro	1.50	1	2.22	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Great Falls, MT MSA	10.87	5	11.11	0.00	60.00	20.00	20.00	0	0	0	0	0	0	0.00	19.68	60.30	20.02
Mineral County, MT Non-Metro	0.63	1	2.22	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Missoula, MT MSA	7.75	3	6.67	0.00	33.33	66.67	0.00	0	1	0	0	0	-1	0.00	17.44	56.51	26.05

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NEBRASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Lincoln, NE MSA	58.61	10,985	1,529,564	4,868	199,576	63	3,821	15	9,179	15,931	1,742,141	52.55
Tri-City, NE Non-Metro	20.66	2,970	349,470	1,939	121,088	699	86,148	5	1,302	5,613	558,008	29.72
<b>Limited Review:</b>												
Norfolk, NE Non-Metro	9.04	1,245	133,837	713	29,418	496	50,141	1	950	2,455	214,345	7.23
North Platte, NE Non-Metro	5.28	702	80,048	481	33,804	247	38,891	4	1,200	1,434	153,943	4.57
Northern NE Non-Metro	2.06	119	14,910	195	7,821	245	26,727	0	0	559	49,458	1.31
Red Willow County, NE Non-Metro	1.16	105	10,480	178	7,672	31	2,751	0	0	314	20,903	1.85
Western NE Non-Metro	3.21	331	31,022	193	4,637	347	44,816	0	0	871	80,475	2.76

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEBRASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lincoln, NE MSA	4,378	70.17	0.59	0.48	12.41	11.31	58.91	56.17	28.10	32.05	20.39	12.50	19.55	22.10	18.11
Tri-City, NE Non-Metro	1,067	17.10	0.00	0.00	0.72	0.19	78.13	68.23	21.15	31.58	24.21	0.00	25.00	23.23	26.30
<b>Limited Review:</b>															
Norfolk, NE Non-Metro	372	5.96	0.00	0.00	3.38	5.91	75.16	62.63	21.45	31.45	22.27	0.00	30.00	23.27	19.23
North Platte, NE Non-Metro	235	3.77	0.00	0.00	1.35	0.43	77.45	69.79	21.21	29.79	16.84	0.00	0.00	15.02	22.45
Northern NE Non-Metro	41	0.66	0.00	0.00	16.61	0.00	83.39	100.00	0.00	0.00	38.46	0.00	0.00	38.46	0.00
Red Willow County, NE Non-Metro	39	0.63	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.37	0.00	0.00	7.37	0.00
Western NE Non-Metro	107	1.72	0.00	0.00	0.00	0.00	71.97	71.03	28.03	28.97	23.66	0.00	0.00	24.39	22.45

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: NEBRASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Lincoln, NE MSA	244	46.92	0.59	0.82	12.41	14.75	58.91	50.00	28.10	34.43	8.98	33.33	8.00	7.77	10.53
Tri-City, NE Non-Metro	149	28.65	0.00	0.00	0.72	0.00	78.13	75.84	21.15	24.16	25.00	0.00	0.00	28.00	14.29
Limited Review:															
Norfolk, NE Non-Metro	68	13.08	0.00	0.00	3.38	1.47	75.16	64.71	21.45	33.82	35.71	0.00	0.00	36.67	36.36
North Platte, NE Non-Metro	33	6.35	0.00	0.00	1.35	0.00	77.45	78.79	21.21	21.21	25.00	0.00	0.00	18.18	45.45
Northern NE Non-Metro	6	1.15	0.00	0.00	16.61	16.67	83.39	83.33	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Red Willow County, NE Non-Metro	2	0.38	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
Western NE Non-Metro	18	3.46	0.00	0.00	0.00	0.00	71.97	66.67	28.03	33.33	36.36	0.00	0.00	37.50	33.33

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NEBRASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lincoln, NE MSA	6,345	65.60	0.59	0.17	12.41	6.52	58.91	50.42	28.10	42.88	16.73	10.00	16.11	17.45	16.07
Tri-City, NE Non-Metro	1,749	18.08	0.00	0.00	0.72	0.11	78.13	65.07	21.15	34.82	21.11	0.00	14.29	21.04	21.33
<b>Limited Review:</b>															
Norfolk, NE Non-Metro	804	8.31	0.00	0.00	3.38	3.48	75.16	55.60	21.45	40.92	27.42	0.00	52.00	25.41	28.27
North Platte, NE Non-Metro	434	4.49	0.00	0.00	1.35	0.23	77.45	71.66	21.21	28.11	23.12	0.00	0.00	21.32	28.13
Northern NE Non-Metro	72	0.74	0.00	0.00	16.61	2.78	83.39	97.22	0.00	0.00	21.43	0.00	16.67	21.79	0.00
Red Willow County, NE Non-Metro	64	0.66	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.86	0.00	0.00	13.86	0.00
Western NE Non-Metro	205	2.12	0.00	0.00	0.00	0.00	71.97	60.98	28.03	39.02	36.00	0.00	0.00	40.00	30.91

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEBRASKA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Lincoln, NE MSA	13	65.00	14.11	30.77	32.15	69.23	36.73	0.00	17.02	0.00	0.98	0.00	2.44	0.00	0.00	
Tri-City, NE Non-Metro	5	25.00	0.00	0.00	4.33	0.00	69.57	100.00	26.10	0.00	20.00	0.00	0.00	22.22	0.00	
Limited Review:																
Norfolk, NE Non-Metro	1	5.00	0.00	0.00	31.64	0.00	37.21	100.00	31.16	0.00	25.00	0.00	0.00	50.00	0.00	
North Platte, NE Non-Metro	0	0.00	0.00	0.00	0.16	0.00	44.73	0.00	55.11	0.00	0.00	0.00	0.00	0.00	0.00	
Northern NE Non-Metro	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	
Red Willow County, NE Non-Metro	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	
Western NE Non-Metro	1	5.00	0.00	0.00	0.00	0.00	26.82	0.00	73.18	100.00	0.00	0.00	0.00	0.00	0.00	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses			Geography: NEBRASKA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
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>															
Lincoln, NE MSA	4,848	56.72	1.92	1.34	21.80	24.28	45.64	38.26	29.72	36.12	26.10	24.62	25.86	25.33	28.29
Tri-City, NE Non-Metro	1,939	22.69	0.00	0.00	0.99	4.44	79.62	67.61	19.38	27.95	22.77	0.00	54.76	22.16	26.48
<b>Limited Review:</b>															
Norfolk, NE Non-Metro	713	8.34	0.00	0.00	5.01	3.51	77.76	68.86	17.23	27.63	19.82	0.00	14.63	20.49	22.73
North Platte, NE Non-Metro	481	5.63	0.00	0.00	1.64	2.08	66.00	63.20	32.36	34.72	24.32	0.00	60.00	20.92	32.93
Northern NE Non-Metro	195	2.28	0.00	0.00	24.04	1.54	75.96	98.46	0.00	0.00	28.89	0.00	73.68	27.94	0.00
Red Willow County, NE Non-Metro	178	2.08	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	34.44	0.00	0.00	36.62	0.00
Western NE Non-Metro	193	2.26	0.00	0.00	0.00	0.00	78.94	68.91	21.06	31.09	21.65	0.00	0.00	26.00	15.28

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NEBRASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Lincoln, NE MSA	63	2.96	0.12	0.00	5.66	9.52	74.32	49.21	19.84	41.27	5.80	0.00	33.33	3.23	13.21
Tri-City, NE Non-Metro	699	32.85	0.00	0.00	0.36	0.86	90.59	89.84	9.05	9.30	22.74	0.00	100.00	21.64	36.17
<b>Limited Review:</b>															
Norfolk, NE Non-Metro	496	23.31	0.00	0.00	1.09	0.00	92.11	98.99	6.80	1.01	12.05	0.00	0.00	12.38	4.76
North Platte, NE Non-Metro	247	11.61	0.00	0.00	4.33	11.34	59.79	60.32	35.88	28.34	12.61	0.00	8.70	11.04	19.23
Northern NE Non-Metro	245	11.51	0.00	0.00	42.67	17.14	57.33	82.86	0.00	0.00	26.84	0.00	25.00	28.57	0.00
Red Willow County, NE Non-Metro	31	1.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.33	0.00	0.00	37.50	0.00
Western NE Non-Metro	347	16.31	0.00	0.00	0.00	0.00	88.73	81.84	11.27	18.16	38.25	0.00	0.00	35.22	63.64

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: NEBRASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lincoln, NE MSA	4,383	70.20	17.18	15.85	19.00	32.67	26.42	27.45	37.39	24.03	23.13	22.90	28.67	23.57	17.61
Tri-City, NE Non-Metro	1,067	17.09	15.29	9.33	17.51	25.60	25.51	27.08	41.69	38.00	28.79	26.85	30.47	27.22	29.34
<b>Limited Review:</b>															
Norfolk, NE Non-Metro	372	5.96	15.63	11.46	19.97	23.78	24.77	31.23	39.63	33.52	25.08	22.58	29.51	25.56	23.26
North Platte, NE Non-Metro	235	3.76	16.46	4.11	16.92	17.81	23.39	31.96	43.23	46.12	17.50	5.56	13.24	18.18	20.74
Northern NE Non-Metro	41	0.66	22.47	5.26	22.53	21.05	23.17	34.21	31.82	39.47	37.50	0.00	33.33	37.50	60.00
Red Willow County, NE Non-Metro	39	0.62	17.15	5.26	19.18	15.79	29.81	31.58	33.86	47.37	9.46	0.00	5.88	11.54	13.04
Western NE Non-Metro	107	1.71	18.41	7.84	16.57	15.69	23.67	29.41	41.35	47.06	24.56	9.09	9.52	25.53	37.14

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.0% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: NEBRASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Lincoln, NE MSA	244	46.92	17.18	12.45	19.00	18.26	26.42	32.37	37.39	36.93	9.33	10.00	7.35	9.39	10.07
Tri-City, NE Non-Metro	149	28.65	15.29	7.64	17.51	16.67	25.51	26.39	41.69	49.31	25.49	27.27	21.88	23.91	28.13
<b>Limited Review:</b>															
Norfolk, NE Non-Metro	68	13.08	15.63	6.06	19.97	21.21	24.77	27.27	39.63	45.45	37.14	16.67	50.00	44.44	37.50
North Platte, NE Non-Metro	33	6.35	16.46	9.68	16.92	12.90	23.39	32.26	43.23	45.16	26.19	0.00	0.00	33.33	33.33
Northern NE Non-Metro	6	1.15	22.47	0.00	22.53	16.67	23.17	33.33	31.82	50.00	0.00	0.00	0.00	0.00	0.00
Red Willow County, NE Non-Metro	2	0.38	17.15	50.00	19.18	0.00	29.81	50.00	33.86	0.00	0.00	0.00	0.00	0.00	0.00
Western NE Non-Metro	18	3.46	18.41	0.00	16.57	16.67	23.67	11.11	41.35	72.22	36.36	0.00	0.00	50.00	33.33

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Table 16: Borrower Distribution of Home Mortgage Refinance Loans															
Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEBRASKA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Lincoln, NE MSA	6,345	65.60	17.18	5.78	19.00	19.71	26.42	28.55	37.39	45.97	18.11	15.66	17.66	18.54	18.42
Tri-City, NE Non-Metro	1,749	18.08	15.29	5.28	17.51	15.35	25.51	26.67	41.69	52.70	22.57	26.27	23.51	22.27	21.99
Limited Review:															
Norfolk, NE Non-Metro	804	8.31	15.63	4.31	19.97	14.02	24.77	26.55	39.63	55.12	28.25	28.13	28.18	28.32	28.24
North Platte, NE Non-Metro	434	4.49	16.46	5.54	16.92	9.82	23.39	27.46	43.23	57.18	24.45	36.00	16.07	20.30	27.02
Northern NE Non-Metro	72	0.74	22.47	4.55	22.53	6.06	23.17	24.24	31.82	65.15	22.97	25.00	8.33	21.74	29.03
Red Willow County, NE Non-Metro	64	0.66	17.15	5.17	19.18	12.07	29.81	22.41	33.86	60.34	14.94	9.09	16.67	7.41	21.62
Western NE Non-Metro	205	2.12	18.41	6.21	16.57	11.30	23.67	28.81	41.35	53.67	38.61	36.36	25.00	38.71	42.55

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 10.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Table 11: Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: NEBRASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*			
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Lincoln, NE MSA	4,868	56.82	67.19	68.49	94.70	2.75	2.55	26.10	34.19		
Tri-City, NE Non-Metro	1,939	22.63	69.89	62.61	89.17	5.72	5.11	22.77	29.18		
Limited Review:											
Norfolk, NE Non-Metro	713	8.32	70.07	74.05	93.41	3.51	3.09	19.82	25.28		
North Platte, NE Non-Metro	481	5.61	69.71	65.70	87.94	5.82	6.24	24.32	32.76		
Northern NE Non-Metro	195	2.28	68.21	78.46	95.38	3.59	1.03	28.89	41.67		
Red Willow County, NE Non-Metro	178	2.08	71.89	70.79	93.26	5.06	1.69	34.44	48.44		
Western NE Non-Metro	193	2.25	67.01	88.08	98.45	1.55	0.00	21.65	28.66		

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 18.0% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: NEBRASKA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*			
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Lincoln, NE MSA	63	2.96	98.69	79.37	76.19	23.81	0.00	5.80	5.12		
Tri-City, NE Non-Metro	699	32.85	97.86	58.51	61.80	25.18	13.02	22.74	15.54		
Limited Review:											
Norfolk, NE Non-Metro	496	23.31	98.55	59.48	68.95	17.94	13.10	12.05	9.15		
North Platte, NE Non-Metro	247	11.61	97.94	62.35	44.53	35.63	19.84	12.61	10.12		
Northern NE Non-Metro	245	11.51	98.67	57.55	68.57	20.41	11.02	26.84	20.26		
Red Willow County, NE Non-Metro	31	1.46	99.45	61.29	74.19	22.58	3.23	33.33	40.00		
Western NE Non-Metro	347	16.31	97.11	55.04	61.38	23.34	15.27	38.25	29.55		

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 30.4% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEBRASKA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Lincoln, NE MSA	5	3,827	22	7,764	27	11,591	29.59	0	0
Tri-City, NE Non-Metro	7	6,422	25	18,082	32	24,504	62.56	0	0
<b>Limited Review:</b>									
Norfolk, NE Non-Metro	2	616	4	11	6	627	1.60	1	28
North Platte, NE Non-Metro	1	15	8	1,493	9	1,508	3.85	1	20
Northern NE Non-Metro	0	0	0	0	0	0	0.00	0	0
Red Willow County, NE Non-Metro	0	0	1	15	1	15	0.04	0	0
Western NE Non-Metro	0	0	2	25	2	25	0.06	0	0
<b>Statewide:</b>									
Nebraska Statewide	4	640	1	260	5	900	2.30	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEBRASKA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
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>																	
Lincoln, NE MSA	52.55	9	37.50	22.22	33.33	22.22	22.22	0	2	0	0	-1	-1	11.25	17.88	40.34	30.03
Tri-City, NE Non-Metro	29.72	6	25.00	0.00	33.33	50.00	16.67	0	1	0	0	-1	0	0.00	10.15	65.81	24.03
<b>Limited Review:</b>																	
Norfolk, NE Non-Metro	7.23	3	12.50	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	5.64	80.29	14.07
North Platte, NE Non-Metro	4.57	2	8.33	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	0.00	67.22	32.78
Northern NE Non-Metro	1.31	1	4.17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Red Willow County, NE Non-Metro	1.85	1	4.17	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Western NE Non-Metro	2.76	2	8.33	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	70.45	29.55

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NEVADA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Las Vegas-Paradise, NV MSA	65.19	43,502	7,834,794	36,563	1,000,388	90	3,229	18	90,487	80,173	8,928,898	60.86
<b>Limited Review:</b>												
Carson City, NV MSA	2.60	1,019	183,198	2,170	63,095	5	269	4	7,174	3,198	253,737	3.04
Greater NV Non-Metro	10.35	7,010	1,216,467	5,295	170,970	416	27,514	4	7,002	12,725	1,421,953	5.79
Reno-Sparks, NV MSA	21.86	13,908	2,904,303	12,896	404,440	72	3,467	4	18,348	26,880	3,330,559	30.31

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	29,649	73.70	0.39	0.32	16.32	4.78	44.57	45.54	38.72	49.36	22.69	19.70	33.49	22.65	21.96
<b>Limited Review:</b>															
Carson City, NV MSA	360	0.89	0.00	0.00	6.70	10.83	68.56	71.39	24.74	17.78	20.12	0.00	25.49	21.12	15.07
Greater NV Non-Metro	3,197	7.95	0.00	0.00	12.32	8.82	68.74	67.03	18.94	24.15	25.20	0.00	24.93	25.14	25.47
Reno-Sparks, NV MSA	7,021	17.45	0.98	0.17	16.35	8.18	44.30	45.16	38.38	46.49	27.27	7.69	23.83	27.53	27.67

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	578	47.93	0.39	0.52	16.32	11.25	44.57	41.00	38.72	47.23	32.40	100.00	35.48	35.06	29.60
<b>Limited Review:</b>															
Carson City, NV MSA	32	2.65	0.00	0.00	6.70	6.25	68.56	68.75	24.74	25.00	42.86	0.00	0.00	100.00	25.00
Greater NV Non-Metro	311	25.79	0.00	0.00	12.32	4.18	68.74	61.41	18.94	34.41	34.64	0.00	10.00	29.89	46.43
Reno-Sparks, NV MSA	285	23.63	0.98	0.00	16.35	10.88	44.30	35.09	38.38	54.04	40.40	0.00	36.36	46.15	37.93

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	13,254	55.28	0.39	0.09	16.32	4.64	44.57	37.67	38.72	57.60	23.68	25.00	29.28	24.20	22.98
<b>Limited Review:</b>															
Carson City, NV MSA	626	2.61	0.00	0.00	6.70	6.39	68.56	61.50	24.74	32.11	20.65	0.00	23.53	22.06	17.92
Greater NV Non-Metro	3,498	14.59	0.00	0.00	12.32	6.83	68.74	59.58	18.94	33.59	28.31	0.00	31.00	27.99	28.33
Reno-Sparks, NV MSA	6,596	27.51	0.98	0.15	16.35	5.79	44.30	33.72	38.38	60.34	29.07	23.08	27.33	31.30	28.07

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	15	60.00	5.44	6.67	45.33	33.33	37.71	53.33	11.53	6.67	3.45	0.00	0.00	0.00	16.67
<b>Limited Review:</b>															
Carson City, NV MSA	1	4.00	0.00	0.00	23.09	0.00	63.04	100.00	13.87	0.00	0.00	0.00	0.00	0.00	0.00
Greater NV Non-Metro	3	12.00	0.00	0.00	8.97	0.00	67.64	66.67	23.38	33.33	50.00	0.00	0.00	0.00	100.00
Reno-Sparks, NV MSA	6	24.00	11.64	0.00	53.56	50.00	24.75	50.00	10.04	0.00	9.09	0.00	0.00	33.33	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	36,538	64.22	2.24	1.66	17.24	10.03	37.56	36.42	42.56	51.89	25.27	21.84	27.97	24.09	25.89
<b>Limited Review:</b>															
Carson City, NV MSA	2,170	3.81	0.00	0.00	13.04	10.88	70.05	70.51	16.90	18.62	31.04	0.00	26.75	33.27	27.67
Greater NV Non-Metro	5,293	9.30	0.00	0.00	10.81	9.30	68.33	69.51	20.70	21.20	32.55	0.00	33.62	31.81	39.29
Reno-Sparks, NV MSA	12,896	22.67	2.45	1.91	33.49	28.73	30.21	28.00	33.84	41.36	31.83	30.23	30.65	34.84	31.64

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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	90	15.44	0.84	0.00	13.93	0.00	41.64	35.56	43.48	64.44	63.64	0.00	0.00	60.00	65.22
<b>Limited Review:</b>															
Carson City, NV MSA	5	0.86	0.00	0.00	5.66	0.00	73.58	100.00	20.75	0.00	25.00	0.00	0.00	100.00	0.00
Greater NV Non-Metro	416	71.36	0.00	0.00	11.32	12.50	72.03	74.04	16.46	13.46	64.38	0.00	64.29	62.64	92.00
Reno-Sparks, NV MSA	72	12.35	1.38	6.94	22.31	31.94	38.15	29.17	38.15	31.94	53.85	100.00	72.73	53.85	41.67

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEVADA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	29,652	73.71	18.69	13.18	18.74	24.45	23.47	24.65	39.10	37.72	23.74	25.15	22.96	23.29	24.00
<b>Limited Review:</b>															
Carson City, NV MSA	360	0.89	18.53	15.80	18.74	27.59	22.28	26.72	40.45	29.89	20.40	23.70	18.47	19.72	20.12
Greater NV Non-Metro	3,197	7.95	18.06	8.31	18.74	22.40	25.29	31.58	37.91	37.72	25.50	22.67	26.30	24.83	26.47
Reno-Sparks, NV MSA	7,021	17.45	19.08	15.24	18.90	25.63	23.06	24.22	38.95	34.91	27.35	26.61	25.86	26.33	29.66

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.9% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: NEVADA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	578	47.93	18.69	9.87	18.74	18.31	23.47	29.44	39.10	42.37	30.77	31.82	29.85	32.11	30.00
<b>Limited Review:</b>															
Carson City, NV MSA	32	2.65	18.53	18.75	18.74	15.63	22.28	21.88	40.45	43.75	42.86	50.00	0.00	100.00	33.33
Greater NV Non-Metro	311	25.79	18.06	6.23	18.74	16.07	25.29	35.74	37.91	41.97	32.41	23.53	29.03	36.84	33.90
Reno-Sparks, NV MSA	285	23.63	19.08	8.93	18.90	20.71	23.06	26.43	38.95	43.93	42.45	47.37	53.85	37.93	38.46

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEVADA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Las Vegas-Paradise, NV MSA	13,257	55.29	18.69	6.54	18.74	16.64	23.47	23.44	39.10	53.39	22.97	19.12	21.12	22.86	24.21
<b>Limited Review:</b>															
Carson City, NV MSA	626	2.61	18.53	8.66	18.74	14.50	22.28	29.19	40.45	47.65	19.41	23.26	9.88	23.20	20.00
Greater NV Non-Metro	3,499	14.59	18.06	5.49	18.74	15.02	25.29	29.62	37.91	49.86	26.53	23.08	26.23	26.11	27.23
Reno-Sparks, NV MSA	6,596	27.51	19.08	6.65	18.90	16.30	23.06	24.27	38.95	52.78	30.44	24.15	29.91	32.76	30.54

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 23.4% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEVADA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Las Vegas-Paradise, NV MSA	36,563	64.23	67.00	76.76	97.51	1.46	1.03	25.27	38.28	
Limited Review:										
Carson City, NV MSA	2,170	3.81	67.07	75.35	96.91	1.89	1.20	31.04	43.12	
Greater NV Non-Metro	5,295	9.30	69.31	75.07	96.07	2.47	1.45	32.55	49.13	
Reno-Sparks, NV MSA	12,896	22.65	68.20	74.62	96.72	2.07	1.21	31.83	46.09	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.8% 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: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Las Vegas-Paradise, NV MSA	90	15.44	93.32	88.89	95.56	3.33	1.11	63.64	76.19	
<b>Limited Review:</b>										
Carson City, NV MSA	5	0.86	96.23	20.00	100.00	0.00	0.00	25.00	0.00	
Greater NV Non-Metro	416	71.36	94.39	80.77	83.89	7.21	8.89	64.38	67.78	
Reno-Sparks, NV MSA	72	12.35	93.69	55.56	95.83	0.00	4.17	53.85	45.00	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 16.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEVADA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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	12	18,778	201	50,004	213	68,781	79.88	1	41
<b>Limited Review:</b>									
Carson City, NV MSA	1	604	4	1,669	5	2,273	2.64	0	0
Greater NV Non-Metro	3	742	3	3,791	6	4,533	5.26	1	99
Reno-Sparks, NV MSA	6	5,850	35	3,138	41	8,988	10.44	1	2
<b>Statewide:</b>									
Nevada Statewide	0	0	1	1,530	1	1,530	1.78	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NEVADA				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
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	60.86	81	66.39	6.17	28.40	37.04	28.40	1	7	-1	0	-2	-3	5.29	22.78	42.19	29.74		
<b>Limited Review:</b>																			
Carson City, NV MSA	3.04	3	2.46	0.00	33.33	66.67	0.00	0	1	0	0	-1	0	0.00	19.89	73.22	6.89		
Greater NV Non-Metro	5.79	13	10.66	0.00	23.08	76.92	0.00	0	1	0	0	-1	0	1.04	19.00	62.99	16.98		
Reno-Sparks, NV MSA	30.31	25	20.49	16.00	32.00	24.00	28.00	1	1	0	0	0	0	10.11	22.33	34.85	32.66		

**Table 1. Lending Volume**

LENDING VOLUME												Geography: NEW JERSEY												Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011											
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***																							
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)																								
<b>Full Review:</b>																																			
Edison-New Brunswick, NJ MD		56.62	37,141	9,792,774	8,272	378,794	23	670	7	34,705	45,443	10,206,943	63.52																						
<b>Limited Review:</b>																																			
Atlantic City-Hammonton, NJ MSA		5.76	4,033	826,416	591	21,990	4	339	1	750	4,629	849,495	6.54																						
Camden, NJ MD		25.60	17,342	3,328,427	3,184	153,732	21	1,431	2	13,136	20,549	3,496,726	17.56																						
Ocean City, NJ MSA		4.06	3,075	885,150	185	7,042	0	0	0	0	3,260	892,192	0.52																						
Trenton-Ewing, NJ MSA		7.96	5,146	1,205,035	1,236	57,355	4	48	1	100	6,387	1,262,538	11.86																						

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Edison-New Brunswick, NJ MD	11,458	52.22	3.50	2.30	14.87	13.96	51.71	50.84	29.93	32.91	25.38	20.71	24.78	25.96	25.17
Limited Review:															
Atlantic City-Hammonton, NJ MSA	1,421	6.48	0.98	0.35	9.67	8.02	66.10	66.22	23.26	25.40	26.90	20.00	29.11	28.03	23.76
Camden, NJ MD	6,204	28.28	3.02	1.26	9.38	8.59	62.69	63.38	24.91	26.77	24.63	25.14	26.69	24.90	23.39
Ocean City, NJ MSA	972	4.43	0.00	0.00	21.44	16.98	50.49	47.02	28.06	36.01	19.10	0.00	22.63	17.77	19.23
Trenton-Ewing, NJ MSA	1,885	8.59	6.07	4.51	12.82	10.24	38.98	38.67	42.12	46.58	31.39	43.22	36.25	31.20	29.75

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Edison-New Brunswick, NJ MD	580	52.78	3.50	0.52	14.87	11.03	51.71	52.24	29.93	36.21	12.77	4.92	10.47	12.31	14.97
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	62	5.64	0.98	0.00	9.67	3.23	66.10	58.06	23.26	38.71	9.07	0.00	7.69	7.26	14.41
Camden, NJ MD	308	28.03	3.02	1.62	9.38	7.47	62.69	60.39	24.91	30.52	7.81	7.89	8.44	7.05	9.45
Ocean City, NJ MSA	72	6.55	0.00	0.00	21.44	5.56	50.49	38.89	28.06	55.56	13.86	0.00	6.25	10.37	23.81
Trenton-Ewing, NJ MSA	77	7.01	6.07	5.19	12.82	3.90	38.98	35.06	42.12	55.84	9.52	23.08	5.88	7.84	10.90

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE		Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Edison-New Brunswick, NJ MD	25,101	57.46	3.50	0.99	14.87	10.14	51.71	49.90	29.93	38.97	21.43	21.98	22.44	22.21	20.23
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	2,548	5.83	0.98	0.39	9.67	4.40	66.10	63.89	23.26	31.32	25.31	15.38	31.42	25.22	24.85
Camden, NJ MD	10,827	24.78	3.02	0.32	9.38	4.94	62.69	60.16	24.91	34.57	20.07	18.60	21.06	20.83	18.64
Ocean City, NJ MSA	2,031	4.65	0.00	0.00	21.44	10.88	50.49	41.26	28.06	47.86	22.56	0.00	21.88	21.48	23.88
Trenton-Ewing, NJ MSA	3,180	7.28	6.07	1.32	12.82	4.91	38.98	32.36	42.12	61.42	21.82	25.22	25.96	24.96	19.98

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Edison-New Brunswick, NJ MD	2	22.22	7.81	0.00	24.08	0.00	53.46	100.00	14.66	0.00	1.06	0.00	0.00	2.44	0.00
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	0	0.00	14.40	0.00	27.71	0.00	51.78	0.00	6.10	0.00	0.00	0.00	0.00	0.00	0.00
Camden, NJ MD	3	33.33	6.64	33.33	24.73	33.33	57.35	33.33	11.28	0.00	4.55	50.00	0.00	0.00	0.00
Ocean City, NJ MSA	0	0.00	0.00	0.00	22.14	0.00	53.11	0.00	24.75	0.00	0.00	0.00	0.00	0.00	0.00
Trenton-Ewing, NJ MSA	4	44.44	19.55	0.00	8.94	0.00	40.17	0.00	31.35	100.00	23.53	0.00	0.00	0.00	50.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses		Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
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>															
Edison-New Brunswick, NJ MD	8,256	61.45	3.04	1.76	13.68	10.63	51.01	49.31	32.17	38.30	9.57	5.74	9.13	9.83	10.06
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	591	4.40	5.21	2.20	12.52	10.15	59.81	59.90	22.45	27.75	8.36	6.25	7.65	8.26	10.04
Camden, NJ MD	3,168	23.58	3.82	1.45	9.81	10.20	58.79	56.12	27.33	32.23	10.21	6.67	13.32	10.82	9.39
Ocean City, NJ MSA	185	1.38	0.00	0.00	19.68	15.68	54.95	56.76	25.37	27.57	5.49	0.00	4.13	5.40	7.14
Trenton-Ewing, NJ MSA	1,236	9.20	10.69	8.09	10.70	8.33	32.32	31.15	46.30	52.43	11.71	14.67	13.12	11.97	11.25

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Edison-New Brunswick, NJ MD	23	44.23	1.04	0.00	9.20	21.74	53.74	43.48	36.02	34.78	25.35	0.00	40.00	24.14	24.14	
Limited Review:																
Atlantic City-Hammonton, NJ MSA	4	7.69	0.33	0.00	3.75	0.00	77.16	100.00	18.76	0.00	18.18	0.00	0.00	20.00	0.00	
Camden, NJ MD	21	40.38	0.65	0.00	6.90	0.00	61.56	57.14	30.85	42.86	38.10	0.00	0.00	40.91	41.18	
Ocean City, NJ MSA	0	0.00	0.00	0.00	18.04	0.00	56.01	0.00	25.95	0.00	0.00	0.00	0.00	0.00	0.00	
Trenton-Ewing, NJ MSA	4	7.69	3.01	0.00	9.03	0.00	33.61	0.00	54.35	100.00	21.43	0.00	0.00	0.00	33.33	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Edison-New Brunswick, NJ MD	11,458	52.22	19.11	8.14	18.58	24.48	22.73	28.15	39.58	39.24	26.16	24.86	25.82	27.41	25.88
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	1,421	6.48	19.29	5.99	18.27	21.87	23.34	24.90	39.11	47.24	25.89	23.60	27.74	26.16	25.13
Camden, NJ MD	6,204	28.28	18.85	11.73	18.50	32.09	24.62	27.57	38.03	28.61	24.47	21.52	24.88	25.41	24.48
Ocean City, NJ MSA	972	4.43	18.91	1.69	18.76	6.13	21.69	10.68	40.65	81.50	19.74	22.45	15.94	16.42	20.61
Trenton-Ewing, NJ MSA	1,885	8.59	20.71	16.33	17.30	24.86	21.40	24.24	40.58	34.58	31.99	34.61	31.46	33.03	30.67

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: NEW JERSEY						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Edison-New Brunswick, NJ MD	580	52.78	19.11	7.36	18.58	19.26	22.73	27.85	39.58	45.53	13.17	8.85	11.41	12.68	15.79
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	62	5.64	19.29	3.28	18.27	24.59	23.34	19.67	39.11	52.46	9.27	4.55	10.75	8.04	9.84
Camden, NJ MD	308	28.03	18.85	9.12	18.50	23.65	24.62	26.69	38.03	40.54	7.89	6.18	8.50	7.54	8.36
Ocean City, NJ MSA	72	6.55	18.91	1.41	18.76	9.86	21.69	16.90	40.65	71.83	14.06	5.88	8.33	7.55	18.67
Trenton-Ewing, NJ MSA	77	7.01	20.71	7.89	17.30	21.05	21.40	34.21	40.58	36.84	9.62	5.66	10.10	13.68	7.87

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE		Geography: NEW JERSEY								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Edison-New Brunswick, NJ MD	25,101	57.45	19.11	4.34	18.58	15.67	22.73	26.75	39.58	53.24	23.16	19.58	22.45	22.93	23.93
<b>Limited Review:</b>															
Atlantic City-Hammonton, NJ MSA	2,550	5.84	19.29	3.09	18.27	13.57	23.34	25.46	39.11	57.87	26.48	18.43	23.96	27.99	27.37
Camden, NJ MD	10,827	24.78	18.85	6.03	18.50	19.09	24.62	29.24	38.03	45.63	21.12	19.13	20.01	21.28	21.90
Ocean City, NJ MSA	2,031	4.65	18.91	1.18	18.76	6.04	21.69	13.25	40.65	79.53	24.69	12.40	18.99	25.82	25.52
Trenton-Ewing, NJ MSA	3,180	7.28	20.71	5.40	17.30	14.38	21.40	23.87	40.58	56.35	23.45	22.41	24.25	23.67	23.27

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 9.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NEW JERSEY				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Edison-New Brunswick, NJ MD	8,272	61.42	68.77	57.21	93.47	3.86	2.67	9.57	13.28	
<b>Limited Review:</b>										
Atlantic City-Hammonton, NJ MSA	591	4.39	66.95	60.58	94.42	4.23	1.35	8.36	13.57	
Camden, NJ MD	3,184	23.64	67.46	58.89	92.78	3.86	3.36	10.21	14.18	
Ocean City, NJ MSA	185	1.37	67.33	69.19	98.38	0.54	1.08	5.49	8.47	
Trenton-Ewing, NJ MSA	1,236	9.18	65.33	56.88	92.39	4.21	3.40	11.71	16.71	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 25.5% 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, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size				Market Share*								
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less								
<b>Full Review:</b>																	
Edison-New Brunswick, NJ MD	23	44.23	96.09	69.57	100.00	0.00	0.00	25.35	42.42								
<b>Limited Review:</b>																	
Atlantic City-Hammonton, NJ MSA	4	7.69	95.76	75.00	50.00	50.00	0.00	18.18	28.57								
Camden, NJ MD	21	40.38	95.92	66.67	90.48	0.00	9.52	38.10	55.00								
Ocean City, NJ MSA	0	0.00	96.20	0.00	0.00	0.00	0.00	0.00	0.00								
Trenton-Ewing, NJ MSA	4	7.69	95.65	100.00	100.00	0.00	0.00	21.43	42.86								

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 11.5% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEW JERSEY		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Edison-New Brunswick, NJ MD	0	0	72	101,966	72	101,966	68.43	0	0
<b>Limited Review:</b>									
Atlantic City-Hammonton, NJ MSA	0	0	8	35	8	35	0.02	0	0
Camden, NJ MD	1	4,370	22	21,771	23	26,141	17.54	0	0
Ocean City, NJ MSA	0	0	0	0	0	0	0.00	0	0
Trenton-Ewing, NJ MSA	1	3,074	32	481	33	3,555	2.39	0	0
<b>Statewide:</b>									
New Jersey Statewide	2	16,303	2	1,000	4	17,303	11.61	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NEW JERSEY				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Edison-New Brunswick, NJ MD	63.52	96	61.15	6.25	14.58	51.04	28.13	3	5	0	0	-2	0	6.84	18.20	48.14	26.81		
Limited Review:																			
Atlantic City-Hammonton, NJ MSA	6.54	9	5.73	11.11	11.11	44.44	33.33	0	0	0	0	0	0	6.85	19.82	49.55	22.90		
Camden, NJ MD	17.56	34	21.66	2.94	14.71	47.06	35.29	2	1	0	0	0	1	5.18	17.13	48.03	29.41		
Ocean City, NJ MSA	0.52	1	0.64	0.00	0.00	0.00	100.00	0	0	0	0	0	0	4.19	25.98	43.80	26.04		
Trenton-Ewing, NJ MSA	11.86	17	10.83	29.41	11.76	17.65	41.18	1	1	0	0	0	0	13.57	16.01	31.90	38.00		

**Table 1. Lending Volume**

LENDING VOLUME						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
Geography: NEW MEXICO												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Albuquerque, NM MSA	53.97	18,413	3,283,091	15,445	684,773	171	7,298	23	50,954	34,052	4,026,117	63.42
Greater NM Non-Metro	21.86	8,147	1,238,615	5,066	208,920	571	40,309	10	8,807	13,794	1,496,652	17.14
<b>Limited Review:</b>												
Farmington, NM MSA	5.44	1,893	335,224	1,496	65,906	41	1,324	3	6,423	3,433	408,877	5.00
Las Cruces, NM MSA	10.46	3,870	642,502	2,641	94,836	83	3,291	4	4,500	6,598	745,129	6.71
Santa Fe, NM MSA	8.26	2,484	662,214	2,695	85,566	31	563	2	12,408	5,212	760,752	7.73

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NEW MEXICO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Albuquerque, NM MSA	6,861	51.86	1.39	1.98	23.24	16.75	41.85	37.02	33.52	44.25	17.89	13.84	19.24	16.65	18.69
Greater NM Non-Metro	3,435	25.96	0.58	0.00	16.74	7.13	66.43	62.71	16.25	30.16	21.26	0.00	16.48	22.25	20.74
<b>Limited Review:</b>															
Farmington, NM MSA	873	6.60	4.35	0.11	20.80	4.70	52.16	47.88	22.69	47.31	23.77	12.50	21.84	20.03	30.77
Las Cruces, NM MSA	1,330	10.05	0.00	0.00	27.58	7.59	37.80	42.63	34.62	49.77	13.79	0.00	11.18	12.58	15.42
Santa Fe, NM MSA	732	5.53	0.84	0.55	24.88	13.80	36.23	34.43	38.05	51.23	13.41	5.26	10.82	16.53	12.54

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albuquerque, NM MSA	732	39.35	1.39	1.37	23.24	19.95	41.85	39.07	33.52	39.62	16.34	25.00	20.48	13.37	17.38
Greater NM Non-Metro	650	34.95	0.58	0.15	16.74	15.08	66.43	68.00	16.25	16.77	30.04	33.33	39.71	27.67	30.67
Limited Review:															
Farmington, NM MSA	113	6.08	4.35	0.88	20.80	9.73	52.16	49.56	22.69	39.82	31.20	0.00	50.00	28.57	34.21
Las Cruces, NM MSA	262	14.09	0.00	0.00	27.58	25.19	37.80	31.68	34.62	43.13	46.90	0.00	60.00	39.13	46.38
Santa Fe, NM MSA	103	5.54	0.84	1.94	24.88	18.45	36.23	33.98	38.05	45.63	17.27	0.00	20.00	19.64	14.29

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Albuquerque, NM MSA	10,804	54.86	1.39	1.28	23.24	13.50	41.85	38.59	33.52	46.63	16.28	18.82	18.05	16.62	15.50
Greater NM Non-Metro	4,058	20.61	0.58	0.02	16.74	7.57	66.43	67.87	16.25	24.54	17.55	0.00	16.52	19.14	14.49
Limited Review:															
Farmington, NM MSA	905	4.60	4.35	0.00	20.80	3.09	52.16	52.38	22.69	44.53	19.66	0.00	17.02	19.94	19.53
Las Cruces, NM MSA	2,277	11.56	0.00	0.04	27.58	8.30	37.80	37.24	34.62	54.41	18.76	0.00	17.00	20.54	17.89
Santa Fe, NM MSA	1,648	8.37	0.84	0.97	24.88	12.68	36.23	33.43	38.05	52.91	12.75	14.29	11.75	12.02	13.40

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Albuquerque, NM MSA	16	66.67	3.74	6.25	27.16	37.50	46.31	50.00	22.79	6.25	18.75	0.00	0.00	33.33	0.00
Greater NM Non-Metro	4	16.67	0.15	0.00	13.95	0.00	62.89	100.00	23.01	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Farmington, NM MSA	2	8.33	0.00	0.00	18.38	0.00	46.56	50.00	35.06	50.00	33.33	0.00	0.00	50.00	0.00
Las Cruces, NM MSA	1	4.17	2.29	0.00	25.45	0.00	33.41	100.00	38.84	0.00	7.69	0.00	0.00	50.00	0.00
Santa Fe, NM MSA	1	4.17	2.34	0.00	35.29	100.00	30.73	0.00	31.65	0.00	25.00	0.00	100.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Albuquerque, NM MSA	15,445	56.49	1.63	1.23	21.60	21.70	43.69	39.98	33.08	37.09	30.94	23.12	31.37	33.03	29.89
Greater NM Non-Metro	5,066	18.53	0.03	0.04	13.96	15.34	67.29	65.91	18.72	18.71	27.52	66.67	38.80	29.74	20.48
<b>Limited Review:</b>															
Farmington, NM MSA	1,496	5.47	2.49	0.40	12.39	13.64	59.98	60.70	25.15	25.27	32.09	69.57	43.68	31.27	30.64
Las Cruces, NM MSA	2,641	9.66	0.88	0.38	17.25	16.89	39.49	41.27	42.39	41.46	37.71	63.64	33.85	38.04	40.91
Santa Fe, NM MSA	2,695	9.86	1.78	1.52	17.57	16.18	28.60	31.65	52.06	50.65	22.79	25.81	20.60	26.01	22.90

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NEW MEXICO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Albuquerque, NM MSA	171	19.06	1.58	0.00	22.15	42.69	45.95	32.75	30.32	24.56	61.11	0.00	68.18	60.00	61.90
Greater NM Non-Metro	571	63.66	0.00	0.00	9.43	13.66	77.75	77.41	12.79	8.93	55.62	0.00	88.89	58.72	48.00
<b>Limited Review:</b>															
Farmington, NM MSA	41	4.57	1.18	0.00	11.24	2.44	58.58	85.37	28.99	12.20	76.47	0.00	25.00	91.67	100.00
Las Cruces, NM MSA	83	9.25	0.41	0.00	34.08	33.73	32.65	32.53	32.86	33.73	65.22	0.00	70.59	72.73	66.67
Santa Fe, NM MSA	31	3.46	1.49	3.23	15.17	16.13	36.32	6.45	47.01	74.19	76.92	0.00	100.00	50.00	100.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEW MEXICO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Albuquerque, NM MSA	6,861	51.86	21.03	7.81	17.68	23.82	21.02	27.51	40.27	40.86	19.12	18.25	16.85	20.24	19.99
Greater NM Non-Metro	3,435	25.96	22.53	2.39	17.03	11.19	19.88	23.01	40.56	63.40	22.57	15.52	21.22	22.61	23.33
<b>Limited Review:</b>															
Farmington, NM MSA	873	6.60	22.47	1.66	16.42	11.06	20.54	28.54	40.57	58.74	24.47	18.42	21.02	23.18	27.25
Las Cruces, NM MSA	1,330	10.05	23.12	1.70	16.27	11.14	18.83	23.36	41.78	63.81	16.29	10.00	11.46	17.22	17.34
Santa Fe, NM MSA	732	5.53	22.01	4.56	17.85	14.12	18.89	21.54	41.25	59.77	14.81	9.20	14.56	15.41	15.32

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.8% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: NEW MEXICO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Albuquerque, NM MSA	732	39.35	21.03	8.01	17.68	22.61	21.02	25.56	40.27	43.82	15.46	12.96	16.49	16.36	15.09
Greater NM Non-Metro	650	34.95	22.53	5.56	17.03	15.90	19.88	20.06	40.56	58.49	32.45	24.24	35.94	24.24	36.41
<b>Limited Review:</b>															
Farmington, NM MSA	113	6.08	22.47	6.19	16.42	9.73	20.54	21.24	40.57	62.83	31.45	40.00	25.00	34.48	30.77
Las Cruces, NM MSA	262	14.09	23.12	6.61	16.27	14.40	18.83	27.24	41.78	51.75	47.83	55.56	45.45	58.82	42.47
Santa Fe, NM MSA	103	5.54	22.01	2.91	17.85	20.39	18.89	22.33	41.25	54.37	17.91	9.09	12.50	23.53	19.30

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEW MEXICO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Albuquerque, NM MSA	10,804	54.86	21.03	4.88	17.68	16.70	21.02	26.39	40.27	52.04	16.20	12.13	15.20	17.43	16.45
Greater NM Non-Metro	4,058	20.61	22.53	2.01	17.03	9.86	19.88	20.15	40.56	67.97	18.42	12.36	15.73	22.84	17.89
<b>Limited Review:</b>															
Farmington, NM MSA	905	4.60	22.47	1.67	16.42	8.34	20.54	20.15	40.57	69.83	20.76	15.63	21.55	19.92	21.20
Las Cruces, NM MSA	2,277	11.56	23.12	1.56	16.27	7.65	18.83	18.13	41.78	72.66	20.26	15.52	21.47	22.72	19.68
Santa Fe, NM MSA	1,648	8.37	22.01	3.05	17.85	12.81	18.89	25.22	41.25	58.93	14.11	11.32	9.41	16.47	14.86

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 16.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: NEW MEXICO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*			
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Albuquerque, NM MSA	15,445	56.49	69.25	74.35	93.56	3.57	2.87	30.94	44.94		
Greater NM Non-Metro	5,066	18.53	64.49	76.43	94.04	3.59	2.37	27.52	45.68		
Limited Review:											
Farminaton, NM MSA	1,496	5.47	64.64	71.32	92.78	4.75	2.47	32.09	52.81		
Las Cruces, NM MSA	2,641	9.66	65.31	74.25	95.57	2.46	1.97	37.71	57.95		
Santa Fe, NM MSA	2,695	9.86	66.63	77.29	96.51	2.41	1.08	22.79	34.42		

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.6% 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 MEXICO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Albuquerque, NM MSA	171	19.06	96.63	83.63	90.06	9.36	0.58	61.11	69.70
Greater NM Non-Metro	571	63.66	95.41	77.23	82.49	11.38	6.13	55.62	70.66
<b>Limited Review:</b>									
Farminaton, NM MSA	41	4.57	98.22	97.56	100.00	0.00	0.00	76.47	81.25
Las Cruces, NM MSA	83	9.25	92.24	71.08	95.18	3.61	1.20	65.22	79.31
Santa Fe, NM MSA	31	3.46	97.51	87.10	100.00	0.00	0.00	76.92	81.82

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 8.6% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEW MEXICO		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Albuquerque, NM MSA	11	8,781	62	26,126	73	34,907	49.12	1	98
Greater NM Non-Metro	7	5,736	21	14,736	28	20,472	28.81	0	0
<b>Limited Review:</b>									
Farmington, NM MSA	2	266	5	7,623	7	7,889	11.10	1	5
Las Cruces, NM MSA	3	936	2	25	5	961	1.35	0	0
Santa Fe, NM MSA	6	4,043	29	162	35	4,205	5.92	0	0
<b>Statewide:</b>									
New Mexico Statewide	4	2,225	1	400	5	2,625	3.69	1	74

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NEW MEXICO		Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
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>																	
Albuquerque, NM MSA	63.42	37	38.95	5.41	40.54	18.92	35.14	0	0	0	0	0	0	4.46	31.72	33.64	30.17
Greater NM Non-Metro	17.14	32	33.68	0.00	21.88	62.50	15.63	0	1	0	0	-1	0	1.22	24.64	52.27	21.87
<b>Limited Review:</b>																	
Farmington, NM MSA	5.00	7	7.37	14.29	28.57	57.14	0.00	0	0	0	0	0	0	5.84	11.27	67.07	15.82
Las Cruces, NM MSA	6.71	9	9.47	22.22	44.44	0.00	33.33	0	0	0	0	0	0	9.56	34.48	18.17	37.79
Santa Fe, NM MSA	7.73	10	10.53	0.00	20.00	70.00	10.00	0	0	0	0	0	0	5.94	23.86	35.11	34.44

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: NEW YORK												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Nassau-Suffolk, NY MD	80.52	25,881	7,948,622	3,642	157,031	10	310	4	14,989	29,537	8,120,951	45.55
Limited Review:												
Kingston, NY MSA	3.09	880	169,375	245	7,517	8	204	0	0	1,133	177,096	40.58
Poughkeepsie-Newburgh-Middletown, NY MSA	16.39	5,121	1,165,964	884	28,474	8	340	0	0	6,013	1,194,777	13.86

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nassau-Suffolk, NY MD	11,609	80.73	0.22	0.17	12.21	13.11	66.17	66.18	21.40	20.54	27.05	16.67	24.90	27.32	27.89
Limited Review:															
Kingston, NY MSA	366	2.55	0.00	0.00	8.34	10.11	76.90	76.23	14.76	13.66	18.57	0.00	14.85	19.29	17.35
Poughkeepsie-Newburgh-Middletown, NY MSA	2,405	16.72	2.07	3.37	8.38	7.57	66.59	62.04	22.96	27.03	27.93	22.78	24.88	27.66	30.85

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT		Geography: NEW YORK								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nassau-Suffolk, NY MD	591	85.53	0.22	0.00	12.21	13.71	66.17	65.99	21.40	20.30	13.74	0.00	11.67	14.16	14.00
Limited Review:															
Kingston, NY MSA	24	3.47	0.00	0.00	8.34	4.17	76.90	83.33	14.76	12.50	4.35	0.00	0.00	4.58	4.65
Poughkeepsie-Newburgh-Middletown, NY MSA	76	11.00	2.07	3.95	8.38	5.26	66.59	63.16	22.96	27.63	6.78	25.00	6.52	5.72	8.46

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nassau-Suffolk, NY MD	13,680	81.38	0.22	0.11	12.21	8.39	66.17	67.21	21.40	24.29	20.02	19.15	19.10	20.29	19.66
<b>Limited Review:</b>															
Kingston, NY MSA	490	2.91	0.00	0.00	8.34	4.29	76.90	71.22	14.76	24.49	14.15	0.00	14.41	13.73	15.68
Poughkeepsie-Newburgh-Middletown, NY MSA	2,640	15.70	2.07	0.80	8.38	4.73	66.59	59.92	22.96	34.55	19.66	12.64	18.32	18.81	22.07

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nassau-Suffolk, NY MD	0	0.00	3.51	0.00	27.94	0.00	58.07	0.00	10.49	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Kingston, NY MSA	0	0.00	0.00	0.00	30.39	0.00	63.99	0.00	5.62	0.00	5.88	0.00	0.00	0.00	20.00
Poughkeepsie-Newburgh-Middletown, NY MSA	0	0.00	15.63	0.00	20.85	0.00	59.37	0.00	4.16	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: NEW YORK				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Nassau-Suffolk, NY MD	3,642	76.34	0.58	0.30	12.84	11.23	62.87	63.45	23.70	25.01	2.40	2.19	2.32	2.53	2.31
<b>Limited Review:</b>															
Kingston, NY MSA	245	5.14	0.00	0.00	10.70	6.12	74.98	71.43	14.32	22.45	5.26	0.00	3.36	5.51	6.69
Poughkeepsie-Newburgh-	884	18.53	7.60	6.56	10.86	7.47	61.92	58.14	19.61	27.83	4.82	3.95	4.07	4.90	5.94

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nassau-Suffolk, NY MD	10	38.46	0.34	0.00	17.96	0.00	65.40	80.00	16.29	20.00	9.38	0.00	4.17	13.21	11.11
Limited Review:															
Kingston, NY MSA	8	30.77	0.00	0.00	5.45	0.00	73.39	75.00	21.16	25.00	22.22	0.00	0.00	25.00	20.00
Poughkeepsie-Newburgh-Middletown, NY MSA	8	30.77	0.82	0.00	7.34	25.00	65.42	50.00	26.43	25.00	6.67	0.00	50.00	6.25	4.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nassau-Suffolk, NY MD	11,609	80.73	18.03	4.60	18.61	23.79	24.19	34.04	39.18	37.56	28.11	22.63	25.32	30.38	29.16
<b>Limited Review:</b>															
Kingston, NY MSA	366	2.55	19.23	1.79	18.20	21.43	23.74	27.98	38.83	48.81	17.51	6.52	14.76	19.42	19.11
Poughkeepsie-Newburgh-Middletown, NY MSA	2,405	16.72	19.14	4.44	18.04	23.47	24.40	35.56	38.41	36.53	27.38	24.04	25.81	28.74	27.89

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nassau-Suffolk, NY MD	591	85.53	18.03	6.43	18.61	23.65	24.19	31.65	39.18	38.26	13.79	6.44	13.71	15.63	14.60
<b>Limited Review:</b>															
Kingston, NY MSA	24	3.47	19.23	18.18	18.20	27.27	23.74	22.73	38.83	31.82	3.82	6.00	3.26	2.78	4.00
Poughkeepsie-Newburgh-Middletown, NY MSA	76	11.00	19.14	2.74	18.04	20.55	24.40	28.77	38.41	47.95	6.60	1.32	6.02	7.32	8.51

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.0% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NEW YORK						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nassau-Suffolk, NY MD	13,681	81.38	18.03	5.27	18.61	16.98	24.19	28.82	39.18	48.93	21.46	21.15	20.04	21.13	22.37
<b>Limited Review:</b>															
Kingston, NY MSA	490	2.91	19.23	4.98	18.20	13.57	23.74	23.08	38.83	58.37	14.04	11.40	12.18	11.11	16.76
Poughkeepsie-Newburgh-Middletown, NY MSA	2,640	15.70	19.14	3.25	18.04	14.61	24.40	26.21	38.41	55.92	20.16	16.01	16.63	19.05	22.97

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 4.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: NEW YORK			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Nassau-Suffolk, NY MD	3,642	76.34	70.83	66.53	94.26	4.42	1.32	2.40	4.96
Limited Review:									
Kingston, NY MSA	245	5.14	70.04	79.18	95.92	3.27	0.82	5.26	10.70
Poughkeepsie-Newburgh-Middletown, NY MSA	884	18.53	68.85	67.65	97.29	2.26	0.45	4.82	8.40

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 9.9% 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, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*							
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less						
<b>Full Review:</b>															
Nassau-Suffolk, NY MD	10	38.46	96.73	100.00	100.00	0.00	0.00	9.38	44.44						
<b>Limited Review:</b>															
Kingston, NY MSA	8	30.77	97.19	100.00	100.00	0.00	0.00	22.22	80.00						
Poughkeepsie-Newburgh-Middletown, NY MSA	8	30.77	96.52	75.00	100.00	0.00	0.00	6.67	16.67						

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 7.7% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NEW YORK		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Nassau-Suffolk, NY MD	1	8,901	40	9,035	41	17,936	60.21	0	0
<b>Limited Review:</b>									
Kingston, NY MSA	0	0	1	88	1	88	0.29	0	0
Poughkeepsie-Newburgh-Middletown, NY MSA	2	4,470	2	103	4	4,572	15.35	0	0
<b>Statewide:</b>									
New York Statewide	1	7,191	0	0	1	7,191	24.14	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NEW YORK								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nassau-Suffolk, NY MD	45.55	15	71.43	0.00	6.67	40.00	53.33	2	2	0	0	0	0	2.32	17.95	58.87	20.71
Limited Review:																	
Kingston, NY MSA	40.58	2	9.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	12.30	72.27	15.43
Poughkeepsie-Newburgh-Middletown,	13.86	4	19.05	0.00	0.00	75.00	25.00	0	0	0	0	0	0	8.13	14.68	52.78	24.11

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: NORTH CAROLINA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Greensboro-High Point, NC MSA	10.00	9,540	1,491,438	2,018	104,499	28	1,301	3	6,325	11,589	1,603,563	8.98
Northwestern NC Non-Metro	9.70	8,726	1,582,527	2,480	138,044	37	1,383	0	0	11,243	1,721,954	9.94
Raleigh-Cary, NC MSA	23.93	23,500	4,730,155	4,185	196,115	36	1,757	7	70,238	27,728	4,998,265	27.60
Winston-Salem, NC MSA	6.57	6,239	975,086	1,357	73,277	10	871	0	0	7,606	1,049,234	10.35
Limited Review:												
Asheville, NC MSA	5.97	5,501	1,010,526	1,394	80,454	9	167	7	7,889	6,911	1,099,036	6.50
Burlington, NC MSA	1.81	1,703	237,666	390	30,344	3	581	1	2,120	2,097	270,710	2.14
Camden-Pasquotank, NC Non-Metro	0.68	621	124,544	146	10,721	18	2,768	0	0	785	138,033	0.66
Dare County, NC Non-Metro	1.31	1,302	315,427	214	14,386	1	4	0	0	1,517	329,817	0.65
Durham-Chapel Hill, NC MSA	6.92	6,611	1,319,237	1,376	68,065	32	1,350	3	19,105	8,022	1,407,757	11.42
Eastern NC Non-Metro	3.98	3,454	600,956	1,077	56,055	83	12,191	0	0	4,614	669,201	3.75
Fayetteville, NC MSA	5.95	6,423	1,065,396	456	31,542	7	514	2	25,290	6,888	1,122,742	1.78
Goldsboro, NC MSA	1.39	1,430	208,142	174	8,665	7	355	1	2,800	1,612	219,962	1.04
Greenville, NC MSA	1.91	1,777	275,619	396	28,074	34	3,563	0	0	2,207	307,255	1.88
Hickory-Lenoir-Morganton, NC MSA	3.14	2,935	426,868	692	44,196	6	155	0	0	3,633	471,219	3.54
Jacksonville, NC MSA	4.10	4,462	771,238	293	17,002	0	0	0	0	4,755	788,240	0.71
Lee-Moore, NC Non-Metro	2.18	2,292	439,349	228	15,658	2	13	0	0	2,522	455,020	1.12
Rocky Mount, NC MSA	0.95	870	118,541	223	16,280	7	1,011	0	0	1,100	135,833	0.84
Southern NC Non-Metro	0.84	751	92,290	202	10,758	18	2,698	0	0	971	105,746	0.94
Western NC Non-Metro	1.07	926	189,868	304	11,160	3	115	1	750	1,234	201,893	1.27
Wilmington, NC MSA	6.86	6,875	1,375,587	1,060	50,436	10	166	0	0	7,945	1,426,188	4.09
Wilson County, NC Non-Metro	0.75	657	87,158	206	15,596	8	840	0	0	871	103,594	0.79

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	3,215	9.49	1.58	1.00	13.70	7.84	56.38	49.61	28.34	41.56	26.30	30.26	26.13	26.78	25.65
Northwestern NC Non-Metro	2,611	7.71	0.11	0.08	4.01	2.76	76.45	54.73	19.43	42.44	17.34	20.00	18.03	15.42	20.57
Raleigh-Cary, NC MSA	7,395	21.84	0.78	1.11	18.90	9.11	54.17	61.68	26.14	28.10	22.60	27.67	25.00	22.44	21.98
Winston-Salem, NC MSA	2,113	6.24	0.91	0.85	13.46	8.33	56.06	54.28	29.57	36.54	25.00	50.00	26.28	25.44	23.70
<b>Limited Review:</b>															
Asheville, NC MSA	1,407	4.16	0.55	0.64	6.31	7.75	81.77	78.32	11.36	13.29	15.79	13.79	20.43	15.58	14.87
Burlington, NC MSA	611	1.80	0.00	0.00	12.07	11.78	76.04	74.96	11.89	13.26	25.03	0.00	31.58	25.04	21.21
Camden-Pasquotank, NC Non-Metro	216	0.64	2.17	2.78	11.17	4.63	86.66	92.59	0.00	0.00	23.19	25.00	10.81	24.04	0.00
Dare County, NC Non-Metro	444	1.31	0.00	0.00	0.00	0.00	52.83	45.27	47.17	54.73	21.65	0.00	0.00	23.39	20.41
Durham-Chapel Hill, NC MSA	2,095	6.19	2.82	1.29	10.54	7.59	52.16	50.88	34.48	40.24	18.34	14.15	22.46	18.30	17.94
Eastern NC Non-Metro	1,226	3.62	0.43	0.00	17.16	7.83	62.17	57.01	20.24	35.15	22.36	0.00	21.71	23.98	20.08
Fayetteville, NC MSA	3,176	9.38	1.15	0.31	7.45	5.64	70.71	75.66	20.69	18.39	31.28	28.00	36.77	31.50	29.17
Goldsboro, NC MSA	665	1.96	1.16	0.45	18.30	10.68	62.30	55.19	18.23	33.68	43.33	50.00	43.75	40.89	48.08
Greenville, NC MSA	621	1.83	1.48	1.13	9.91	6.28	54.67	44.44	33.94	48.15	19.01	20.00	28.72	18.17	18.70
Hickory-Lenoir-Morganton, NC MSA	885	2.61	0.00	0.00	8.05	6.44	85.34	81.36	6.61	12.20	19.17	0.00	20.98	18.49	24.19
Jacksonville, NC MSA	2,932	8.66	0.69	0.34	3.33	1.47	77.08	80.05	18.90	18.14	46.25	66.67	50.00	46.41	44.64
Lee-Moore, NC Non-Metro	875	2.58	0.00	0.00	7.89	5.14	41.74	36.46	50.37	58.40	26.28	0.00	22.14	23.23	29.00
Rocky Mount, NC MSA	296	0.87	0.11	0.34	12.49	7.43	70.39	69.26	17.01	22.97	19.56	100.00	20.34	18.53	22.56
Southern NC Non-Metro	339	1.00	1.69	0.29	28.85	18.29	63.99	74.04	5.47	7.37	20.58	0.00	21.24	21.19	15.65
Western NC Non-Metro	202	0.60	0.00	0.00	0.00	0.00	84.19	66.83	15.81	33.17	11.42	0.00	0.00	9.94	15.55
Wilmington, NC MSA	2,338	6.90	1.66	0.34	18.83	13.69	60.15	66.55	19.37	19.42	22.63	21.21	21.25	22.26	25.29
Wilson County, NC Non-Metro	199	0.59	1.56	2.51	14.41	7.54	60.73	61.31	23.30	28.64	21.51	33.33	16.22	22.28	20.51

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	139	7.68	1.58	1.44	13.70	5.04	56.38	60.43	28.34	33.09	18.20	20.00	3.45	19.57	21.88
Northwestern NC Non-Metro	271	14.98	0.11	0.00	4.01	1.85	76.45	73.43	19.43	24.72	17.51	0.00	12.00	18.03	16.74
Raleigh-Cary, NC MSA	343	18.96	0.78	0.87	18.90	10.20	54.17	54.81	26.14	34.11	23.80	25.00	17.97	22.95	28.33
Winston-Salem, NC MSA	97	5.36	0.91	0.00	13.46	7.22	56.06	56.70	29.57	36.08	12.40	0.00	7.84	13.62	12.61
<b>Limited Review:</b>															
Asheville, NC MSA	130	7.19	0.55	0.00	6.31	8.46	81.77	78.46	11.36	13.08	21.41	0.00	22.73	22.47	16.67
Burlington, NC MSA	37	2.05	0.00	0.00	12.07	8.11	76.04	83.78	11.89	8.11	27.78	0.00	12.50	31.51	11.11
Camden-Pasquotank, NC Non-Metro	18	1.00	2.17	0.00	11.17	0.00	86.66	100.00	0.00	0.00	18.31	0.00	0.00	19.12	0.00
Dare County, NC Non-Metro	18	1.00	0.00	0.00	0.00	0.00	52.83	50.00	47.17	50.00	22.92	0.00	0.00	24.00	21.74
Durham-Chapel Hill, NC MSA	127	7.02	2.82	0.00	10.54	12.60	52.16	44.09	34.48	43.31	18.82	0.00	21.62	17.24	21.77
Eastern NC Non-Metro	115	6.36	0.43	0.00	17.16	6.96	62.17	67.83	20.24	25.22	14.49	0.00	11.90	15.02	14.16
Fayetteville, NC MSA	118	6.52	1.15	0.00	7.45	2.54	70.71	64.41	20.69	33.05	17.88	0.00	15.79	16.49	22.58
Goldsboro, NC MSA	34	1.88	1.16	0.00	18.30	17.65	62.30	58.82	18.23	23.53	19.39	0.00	20.00	17.74	25.00
Greenville, NC MSA	30	1.66	1.48	3.33	9.91	3.33	54.67	60.00	33.94	33.33	11.67	0.00	11.11	13.24	9.30
Hickory-Lenoir-Morganton, NC MSA	80	4.42	0.00	0.00	8.05	3.75	85.34	88.75	6.61	7.50	18.28	0.00	11.76	19.38	12.50
Jacksonville, NC MSA	41	2.27	0.69	0.00	3.33	4.88	77.08	65.85	18.90	29.27	7.78	0.00	8.33	7.69	8.20
Lee-Moore, NC Non-Metro	38	2.10	0.00	0.00	7.89	5.26	41.74	39.47	50.37	55.26	12.50	0.00	14.29	10.87	13.33
Rocky Mount, NC MSA	19	1.05	0.11	0.00	12.49	10.53	70.39	42.11	17.01	47.37	14.89	0.00	25.00	8.57	37.50
Southern NC Non-Metro	22	1.22	1.69	0.00	28.85	22.73	63.99	63.64	5.47	13.64	6.47	0.00	2.33	8.26	0.00
Western NC Non-Metro	31	1.71	0.00	0.00	0.00	0.00	84.19	70.97	15.81	29.03	22.50	0.00	0.00	19.70	35.71
Wilmington, NC MSA	82	4.53	1.66	2.44	18.83	12.20	60.15	62.20	19.37	23.17	13.88	33.33	11.11	12.26	22.22
Wilson County, NC Non-Metro	19	1.05	1.56	0.00	14.41	10.53	60.73	68.42	23.30	21.05	28.85	0.00	33.33	25.71	36.36

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	6,183	10.16	1.58	0.50	13.70	4.82	56.38	41.24	28.34	53.44	25.51	22.78	20.39	23.08	28.72
Northwestern NC Non-Metro	5,835	9.58	0.11	0.00	4.01	1.77	76.45	55.06	19.43	43.17	17.58	0.00	19.94	15.55	21.11
Raleigh-Cary, NC MSA	15,756	25.88	0.78	0.44	18.90	6.01	54.17	57.23	26.14	36.32	22.61	22.22	20.08	24.05	21.05
Winston-Salem, NC MSA	4,027	6.61	0.91	0.22	13.46	5.04	56.06	47.16	29.57	47.58	23.97	23.81	20.73	23.44	25.05
<b>Limited Review:</b>															
Asheville, NC MSA	3,963	6.51	0.55	0.58	6.31	5.32	81.77	80.07	11.36	14.03	20.00	12.73	20.48	20.06	19.73
Burlington, NC MSA	1,055	1.73	0.00	0.00	12.07	5.21	76.04	73.36	11.89	21.42	21.84	0.00	19.86	21.56	23.53
Camden-Pasquotank, NC Non-Metro	385	0.63	2.17	1.04	11.17	7.27	86.66	91.69	0.00	0.00	21.55	12.50	26.00	21.36	0.00
Dare County, NC Non-Metro	840	1.38	0.00	0.00	0.00	0.00	52.83	39.17	47.17	60.83	22.01	0.00	0.00	23.63	21.00
Durham-Chapel Hill, NC MSA	4,384	7.20	2.82	0.71	10.54	4.81	52.16	47.47	34.48	47.01	18.23	13.87	18.91	19.28	17.24
Eastern NC Non-Metro	2,112	3.47	0.43	0.00	17.16	5.21	62.17	55.21	20.24	39.58	18.56	0.00	11.65	19.06	19.29
Fayetteville, NC MSA	3,125	5.13	1.15	0.19	7.45	4.03	70.71	68.45	20.69	27.33	24.33	18.52	26.56	24.00	25.00
Goldsboro, NC MSA	731	1.20	1.16	0.14	18.30	10.12	62.30	54.17	18.23	35.57	24.80	8.33	24.86	24.00	26.52
Greenville, NC MSA	1,125	1.85	1.48	0.09	9.91	2.13	54.67	36.18	33.94	61.60	21.77	0.00	12.80	19.23	24.51
Hickory-Lenoir-Morganton, NC MSA	1,968	3.23	0.00	0.00	8.05	3.96	85.34	82.62	6.61	13.41	18.78	0.00	18.65	18.42	21.44
Jacksonville, NC MSA	1,487	2.44	0.69	0.40	3.33	2.69	77.08	78.48	18.90	18.43	23.80	66.67	33.78	23.28	24.62
Lee-Moore, NC Non-Metro	1,379	2.27	0.00	0.00	7.89	3.77	41.74	31.76	50.37	64.47	22.49	0.00	22.13	19.05	24.52
Rocky Mount, NC MSA	554	0.91	0.11	0.00	12.49	5.60	70.39	62.45	17.01	31.95	17.61	0.00	23.17	16.46	19.54
Southern NC Non-Metro	390	0.64	1.69	0.26	28.85	18.72	63.99	72.05	5.47	8.97	12.38	0.00	11.94	12.59	12.03
Western NC Non-Metro	693	1.14	0.00	0.00	0.00	0.00	84.19	67.24	15.81	32.76	16.08	0.00	0.00	14.75	19.32
Wilmington, NC MSA	4,453	7.31	1.66	0.45	18.83	11.77	60.15	62.65	19.37	25.13	22.93	21.21	24.20	22.56	23.38
Wilson County, NC Non-Metro	439	0.72	1.56	0.68	14.41	5.47	60.73	55.58	23.30	38.27	25.14	0.00	20.00	25.34	25.88

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	3	7.32	6.20	0.00	18.44	66.67	42.14	0.00	33.21	33.33	7.69	0.00	12.50	10.00	0.00
Northwestern NC Non-Metro	9	21.95	0.54	0.00	11.71	0.00	65.43	88.89	22.32	11.11	15.15	0.00	0.00	14.29	25.00
Raleigh-Cary, NC MSA	6	14.63	6.77	0.00	18.84	50.00	51.09	33.33	23.30	16.67	2.94	0.00	14.29	0.00	0.00
Winston-Salem, NC MSA	2	4.88	4.17	0.00	22.45	50.00	52.40	0.00	20.98	50.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Asheville, NC MSA	1	2.44	6.05	0.00	17.36	0.00	56.25	100.00	20.34	0.00	0.00	0.00	0.00	0.00	0.00
Burlington, NC MSA	0	0.00	0.00	0.00	14.11	0.00	70.63	0.00	15.26	0.00	0.00	0.00	0.00	0.00	0.00
Camden-Pasquotank, NC Non-Metro	2	4.88	34.13	50.00	22.79	0.00	43.09	50.00	0.00	0.00	50.00	0.00	0.00	50.00	0.00
Dare County, NC Non-Metro	0	0.00	0.00	0.00	0.00	0.00	39.12	0.00	60.88	0.00	0.00	0.00	0.00	0.00	0.00
Durham-Chapel Hill, NC MSA	5	12.20	14.14	20.00	24.69	20.00	31.01	40.00	30.15	20.00	4.55	0.00	0.00	11.11	0.00
Eastern NC Non-Metro	1	2.44	4.71	0.00	24.35	0.00	34.99	100.00	35.94	0.00	0.00	0.00	0.00	0.00	0.00
Fayetteville, NC MSA	4	9.76	3.10	0.00	21.70	25.00	56.62	75.00	18.58	0.00	0.00	0.00	0.00	0.00	0.00
Goldsboro, NC MSA	0	0.00	9.97	0.00	35.49	0.00	21.17	0.00	33.36	0.00	0.00	0.00	0.00	0.00	0.00
Greenville, NC MSA	1	2.44	4.14	0.00	9.49	0.00	47.76	0.00	38.62	100.00	0.00	0.00	0.00	0.00	0.00
Hickory-Lenoir-Morganton, NC MSA	2	4.88	0.00	0.00	26.29	0.00	63.50	100.00	10.21	0.00	0.00	0.00	0.00	0.00	0.00
Jacksonville, NC MSA	2	4.88	2.30	0.00	18.16	0.00	76.61	100.00	2.93	0.00	10.00	0.00	0.00	11.11	0.00
Lee-Moore, NC Non-Metro	0	0.00	0.00	0.00	16.45	0.00	40.54	0.00	43.02	0.00	0.00	0.00	0.00	0.00	0.00
Rocky Mount, NC MSA	1	2.44	1.91	0.00	16.08	0.00	56.53	100.00	25.48	0.00	0.00	0.00	0.00	0.00	0.00
Southern NC Non-Metro	0	0.00	16.78	0.00	23.53	0.00	41.31	0.00	18.38	0.00	0.00	0.00	0.00	0.00	0.00
Western NC Non-Metro	0	0.00	0.00	0.00	0.00	0.00	70.80	0.00	29.20	0.00	0.00	0.00	0.00	0.00	0.00
Wilmington, NC MSA	2	4.88	3.33	0.00	30.57	0.00	45.11	100.00	21.00	0.00	0.00	0.00	0.00	0.00	0.00
Wilson County, NC Non-Metro	0	0.00	12.02	0.00	30.18	0.00	47.97	0.00	9.84	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Greensboro-High Point, NC MSA	2,018	10.71	2.60	1.73	15.57	14.27	49.59	46.28	32.24	37.71	14.54	9.91	13.44	15.12	15.24
Northwestern NC Non-Metro	2,480	13.16	0.41	0.28	5.26	5.44	67.26	58.83	27.07	35.44	13.57	7.02	16.19	13.40	15.23
Raleigh-Cary, NC MSA	4,185	22.20	1.36	0.74	13.81	8.94	57.01	53.52	27.82	36.80	14.34	51.90	9.63	13.58	16.62
Winston-Salem, NC MSA	1,357	7.20	1.46	0.66	11.74	9.21	57.44	53.21	29.36	36.92	14.46	8.77	11.23	14.07	17.19
<b>Limited Review:</b>															
Asheville, NC MSA	1,394	7.40	2.10	4.38	11.93	13.77	74.40	69.44	11.58	12.41	15.28	15.61	16.31	15.94	13.86
Burlington, NC MSA	390	2.07	0.00	0.00	12.45	8.72	71.68	67.44	15.87	23.85	18.18	0.00	26.14	17.33	18.97
Camden-Pasquotank, NC Non-Metro	146	0.77	5.07	2.74	25.38	27.40	69.55	69.86	0.00	0.00	13.03	11.76	18.18	11.92	0.00
Dare County, NC Non-Metro	214	1.14	0.00	0.00	0.00	0.00	41.04	26.17	58.96	73.83	18.14	0.00	0.00	21.29	18.48
Durham-Chapel Hill, NC MSA	1,355	7.19	4.80	3.54	11.35	12.40	48.78	48.04	33.53	36.01	13.75	11.96	15.78	14.04	12.35
Eastern NC Non-Metro	1,077	5.71	0.62	0.00	18.41	20.80	57.91	60.45	23.06	18.76	17.91	0.00	20.65	20.06	12.70
Fayetteville, NC MSA	456	2.42	5.18	6.80	12.17	10.09	61.03	60.53	21.62	22.59	9.06	10.47	12.09	9.52	7.52
Goldsboro, NC MSA	174	0.92	5.65	2.87	18.37	14.94	52.49	58.05	23.49	24.14	12.05	6.90	20.81	10.56	10.16
Greenville, NC MSA	396	2.10	1.35	0.51	13.87	8.84	44.59	53.79	40.19	36.87	12.98	11.11	17.08	15.33	9.68
Hickory-Lenoir-Morganton, NC MSA	692	3.67	0.00	0.00	12.35	11.85	77.73	77.31	9.92	10.84	13.02	0.00	9.16	13.99	12.68
Jacksonville, NC MSA	293	1.55	4.48	5.46	5.97	6.14	72.87	71.67	16.67	16.72	13.84	12.64	14.71	14.76	11.91
Lee-Moore, NC Non-Metro	228	1.21	0.00	0.00	12.32	7.46	44.91	49.12	42.77	43.42	7.17	0.00	3.68	11.21	5.72
Rocky Mount, NC MSA	223	1.18	0.84	0.00	14.67	18.39	68.08	56.95	16.42	24.66	12.19	0.00	17.92	10.06	16.67
Southern NC Non-Metro	202	1.07	2.03	1.98	26.12	19.31	64.62	58.91	7.24	19.80	8.19	8.33	8.47	6.93	18.78
Western NC Non-Metro	304	1.61	0.00	0.00	0.00	0.00	79.09	74.34	20.91	25.66	15.19	0.00	0.00	13.96	25.45
Wilmington, NC MSA	1,060	5.62	2.28	2.55	20.22	19.15	56.64	46.04	20.86	32.26	11.04	12.06	13.52	8.84	14.90
Wilson County, NC Non-Metro	206	1.09	5.03	2.43	17.26	13.11	54.07	49.03	23.64	35.44	15.55	60.32	10.47	13.10	13.98

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NORTH CAROLINA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Greensboro-High Point, NC MSA	28	7.80	1.36	3.57	7.68	0.00	66.31	85.71	24.65	10.71	23.00	100.00	0.00	21.84	50.00	
Northwestern NC Non-Metro	37	10.31	0.20	0.00	1.83	2.70	78.49	86.49	19.48	10.81	10.97	0.00	0.00	10.33	21.05	
Raleigh-Cary, NC MSA	36	10.03	0.45	0.00	23.05	16.67	57.67	66.67	18.83	16.67	9.52	0.00	2.94	15.53	36.36	
Winston-Salem, NC MSA	10	2.79	0.13	0.00	13.12	10.00	64.45	60.00	22.30	30.00	10.96	0.00	11.11	7.84	25.00	
Limited Review:																
Asheville, NC MSA	9	2.51	0.28	0.00	7.80	0.00	83.50	88.89	8.43	11.11	20.00	0.00	0.00	20.00	33.33	
Burlington, NC MSA	3	0.84	0.00	0.00	7.63	0.00	86.01	100.00	6.36	0.00	14.29	0.00	0.00	16.67	0.00	
Camden-Pasquotank, NC Non-Metro	18	5.01	2.75	0.00	8.24	0.00	89.01	100.00	0.00	0.00	13.48	0.00	0.00	13.64	0.00	
Dare County, NC Non-Metro	1	0.28	0.00	0.00	0.00	0.00	46.72	100.00	53.28	0.00	25.00	0.00	0.00	40.00	0.00	
Durham-Chapel Hill, NC MSA	32	8.91	1.42	0.00	7.84	3.13	67.74	90.63	22.78	6.25	32.26	0.00	11.11	39.53	22.22	
Eastern NC Non-Metro	83	23.12	0.29	0.00	19.54	6.02	69.74	92.77	10.43	1.20	11.25	0.00	2.07	17.82	11.11	
Fayetteville, NC MSA	7	1.95	1.34	0.00	7.59	0.00	69.05	85.71	22.02	14.29	13.51	0.00	0.00	14.81	12.50	
Goldsboro, NC MSA	7	1.95	1.29	0.00	5.17	0.00	78.23	71.43	15.31	28.57	3.47	0.00	0.00	3.20	6.67	
Greenville, NC MSA	34	9.47	0.58	0.00	6.76	8.82	68.63	70.59	24.03	20.59	15.45	0.00	20.00	14.61	18.18	
Hickory-Lenoir-Morganton, NC MSA	6	1.67	0.00	0.00	5.15	0.00	89.27	100.00	5.57	0.00	10.91	0.00	0.00	12.00	0.00	
Jacksonville, NC MSA	0	0.00	1.72	0.00	4.01	0.00	80.23	0.00	14.04	0.00	6.25	0.00	0.00	7.69	0.00	
Lee-Moore, NC Non-Metro	2	0.56	0.00	0.00	5.98	0.00	51.32	100.00	42.71	0.00	1.54	0.00	0.00	4.00	0.00	
Rocky Mount, NC MSA	7	1.95	0.00	0.00	6.05	14.29	81.34	85.71	12.61	0.00	4.50	0.00	50.00	2.86	25.00	
Southern NC Non-Metro	18	5.01	0.21	0.00	20.19	5.56	75.73	88.89	3.87	5.56	4.84	0.00	5.56	4.92	0.00	
Western NC Non-Metro	3	0.84	0.00	0.00	0.00	0.00	79.49	100.00	20.51	0.00	10.00	0.00	0.00	12.50	0.00	
Wilmington, NC MSA	10	2.79	0.28	0.00	21.27	20.00	63.06	70.00	15.38	10.00	12.20	0.00	7.14	17.39	0.00	
Wilson County, NC Non-Metro	8	2.23	0.00	0.00	6.29	12.50	75.87	87.50	17.83	0.00	12.90	0.00	0.00	12.90	0.00	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	3,215	9.49	19.32	10.72	18.43	27.57	23.23	23.56	39.02	38.15	25.75	26.97	26.02	26.32	24.97
Northwestern NC Non-Metro	2,611	7.71	16.93	6.76	17.46	18.75	22.97	21.81	42.64	52.68	16.62	15.60	13.55	15.20	18.92
Raleigh-Cary, NC MSA	7,395	21.84	19.58	13.82	18.24	24.08	23.50	24.87	38.68	37.23	23.27	22.04	21.19	23.60	25.08
Winston-Salem, NC MSA	2,113	6.24	19.32	12.87	18.45	27.47	23.31	25.24	38.92	34.42	24.11	23.05	22.85	28.54	22.72
<b>Limited Review:</b>															
Asheville, NC MSA	1,407	4.16	18.01	5.66	19.26	20.94	23.76	24.07	38.96	49.33	16.66	12.72	14.67	17.60	18.02
Burlington, NC MSA	611	1.80	18.81	12.64	18.16	31.60	23.65	23.42	39.38	32.34	24.53	27.86	24.93	25.24	22.65
Camden-Pasquotank, NC Non-Metro	216	0.64	24.11	2.60	17.48	16.67	20.71	29.69	37.70	51.04	22.31	30.00	21.18	21.29	23.08
Dare County, NC Non-Metro	444	1.31	11.49	0.23	15.97	3.20	21.83	10.53	50.72	86.04	24.51	0.00	20.51	25.26	24.75
Durham-Chapel Hill, NC MSA	2,095	6.19	21.15	10.14	17.67	23.60	21.48	21.58	39.70	44.68	19.49	23.37	19.26	20.68	18.26
Eastern NC Non-Metro	1,226	3.62	21.61	3.19	18.06	16.22	21.30	30.50	39.02	50.09	21.86	21.51	23.28	24.19	20.37
Fayetteville, NC MSA	3,176	9.38	19.32	2.91	18.02	14.15	23.43	40.07	39.22	42.87	32.23	32.88	29.13	35.01	30.97
Goldsboro, NC MSA	665	1.96	18.92	4.43	19.11	18.57	23.15	33.90	38.82	43.10	42.24	32.56	35.53	49.16	41.56
Greenville, NC MSA	621	1.83	23.33	4.99	16.32	24.96	19.71	24.60	40.63	45.45	18.06	13.83	18.51	17.09	18.88
Hickory-Lenoir-Morganton, NC MSA	885	2.61	17.58	15.17	19.21	26.68	24.99	23.89	38.22	34.26	17.94	22.54	14.75	16.39	20.00
Jacksonville, NC MSA	2,932	8.66	17.36	0.97	19.59	15.62	24.25	47.91	38.80	35.50	47.37	48.48	47.24	50.77	43.25
Lee-Moore, NC Non-Metro	875	2.58	15.68	2.30	14.77	10.53	21.04	22.52	48.51	64.65	27.84	19.61	22.11	27.20	29.52
Rocky Mount, NC MSA	296	0.87	21.93	10.20	16.94	29.41	21.11	26.67	40.02	33.73	17.62	20.00	18.91	17.53	16.40
Southern NC Non-Metro	339	1.00	28.18	9.25	18.21	22.78	21.38	26.33	32.23	41.64	18.66	24.59	13.40	19.30	21.28
Western NC Non-Metro	202	0.60	18.08	3.61	18.10	10.82	24.39	14.95	39.43	70.62	12.51	8.70	9.04	12.21	14.07
Wilmington, NC MSA	2,338	6.90	20.49	4.71	18.06	19.04	22.04	22.57	39.41	53.67	23.57	19.20	22.17	26.09	23.47
Wilson County, NC Non-Metro	199	0.59	21.91	7.78	16.16	25.15	21.21	35.93	40.72	31.14	19.65	16.67	20.86	24.65	15.63

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	139	7.68	19.32	10.45	18.43	25.37	23.23	17.91	39.02	46.27	18.60	9.46	16.50	17.50	24.28
Northwestern NC Non-Metro	271	14.98	16.93	11.28	17.46	25.19	22.97	20.30	42.64	43.23	17.79	17.44	19.12	16.32	17.89
Raleigh-Cary, NC MSA	343	18.96	19.58	10.00	18.24	17.88	23.50	29.70	38.68	42.42	23.95	21.57	19.35	27.69	24.73
Winston-Salem, NC MSA	97	5.36	19.32	7.37	18.45	24.21	23.31	25.26	38.92	43.16	12.33	10.20	13.98	11.11	12.88
<b>Limited Review:</b>															
Asheville, NC MSA	130	7.19	18.01	8.73	19.26	21.43	23.76	26.19	38.96	43.65	21.67	23.68	18.31	23.61	21.83
Burlington, NC MSA	37	2.05	18.81	10.81	18.16	18.92	23.65	24.32	39.38	45.95	29.41	13.33	25.93	29.41	42.31
Camden-Pasquotank, NC Non-Metro	18	1.00	24.11	0.00	17.48	27.78	20.71	16.67	37.70	55.56	19.40	0.00	37.50	18.18	17.78
Dare County, NC Non-Metro	18	1.00	11.49	0.00	15.97	0.00	21.83	11.11	50.72	88.89	23.40	0.00	0.00	25.00	28.57
Durham-Chapel Hill, NC MSA	127	7.02	21.15	8.06	17.67	22.58	21.48	16.94	39.70	52.42	19.26	9.43	20.48	19.30	21.88
Eastern NC Non-Metro	115	6.36	21.61	7.89	18.06	20.18	21.30	31.58	39.02	40.35	14.77	18.52	20.00	19.10	11.01
Fayetteville, NC MSA	118	6.52	19.32	5.56	18.02	13.89	23.43	21.30	39.22	59.26	16.40	23.53	22.92	16.87	14.29
Goldensboro, NC MSA	34	1.88	18.92	5.88	19.11	17.65	23.15	20.59	38.82	55.88	20.21	0.00	29.41	20.00	21.28
Greenville, NC MSA	30	1.66	23.33	24.14	16.32	27.59	19.71	13.79	40.63	34.48	11.67	25.00	16.13	11.11	6.78
Hickory-Lenoir-Morganton, NC MSA	80	4.42	17.58	12.99	19.21	29.87	24.99	20.78	38.22	36.36	18.25	7.89	21.74	18.52	19.78
Jacksonville, NC MSA	41	2.27	17.36	0.00	19.59	20.51	24.25	28.21	38.80	51.28	7.60	0.00	16.13	8.25	6.31
Lee-Moore, NC Non-Metro	38	2.10	15.68	2.78	14.77	25.00	21.04	25.00	48.51	47.22	12.61	0.00	10.53	18.75	11.67
Rocky Mount, NC MSA	19	1.05	21.93	10.53	16.94	10.53	21.11	15.79	40.02	63.16	16.47	66.67	11.11	4.00	23.08
Southern NC Non-Metro	22	1.22	28.18	9.09	18.21	13.64	21.38	31.82	32.23	45.45	6.59	13.33	2.86	7.69	6.15
Western NC Non-Metro	31	1.71	18.08	6.67	18.10	10.00	24.39	23.33	39.43	60.00	22.08	22.22	7.69	14.81	35.71
Wilmington, NC MSA	82	4.53	20.49	6.49	18.06	19.48	22.04	31.17	39.41	42.86	13.42	9.09	9.72	15.71	15.45
Wilson County, NC Non-Metro	19	1.05	21.91	0.00	16.16	15.79	21.21	26.32	40.72	57.89	30.61	0.00	23.08	30.00	40.91

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.2% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greensboro-High Point, NC MSA	6,183	10.16	19.32	4.43	18.43	13.48	23.23	21.16	39.02	60.92	26.56	24.45	24.46	24.93	27.92
Northwestern NC Non-Metro	5,835	9.58	16.93	3.34	17.46	10.66	22.97	18.91	42.64	67.10	18.37	15.34	15.35	15.84	20.12
Raleigh-Cary, NC MSA	15,756	25.88	19.58	6.48	18.24	17.09	23.50	24.40	38.68	52.03	24.05	23.62	24.62	23.67	24.08
Winston-Salem, NC MSA	4,027	6.61	19.32	5.78	18.45	15.23	23.31	21.97	38.92	57.02	24.59	21.36	23.16	23.88	25.88
<b>Limited Review:</b>															
Asheville, NC MSA	3,963	6.51	18.01	5.21	19.26	17.55	23.76	24.13	38.96	53.11	21.80	18.11	21.43	22.34	22.18
Burlington, NC MSA	1,055	1.73	18.81	4.01	18.16	14.92	23.65	23.72	39.38	57.35	23.02	16.26	18.90	23.49	24.90
Camden-Pasquotank, NC Non-Metro	385	0.63	24.11	4.21	17.48	6.67	20.71	21.75	37.70	67.37	20.66	31.25	10.00	21.43	21.36
Dare County, NC Non-Metro	840	1.38	11.49	1.25	15.97	3.76	21.83	14.29	50.72	80.70	25.12	26.32	16.67	26.52	25.36
Durham-Chapel Hill, NC MSA	4,384	7.20	21.15	4.12	17.67	13.77	21.48	21.27	39.70	60.84	19.57	19.87	19.73	21.39	18.83
Eastern NC Non-Metro	2,112	3.47	21.61	2.58	18.06	9.87	21.30	19.79	39.02	67.76	18.07	13.57	17.18	17.35	18.62
Fayetteville, NC MSA	3,125	5.13	19.32	2.73	18.02	9.74	23.43	24.30	39.22	63.24	17.06	12.61	16.08	17.81	17.17
Goldsboro, NC MSA	731	1.20	18.92	4.77	19.11	10.50	23.15	20.76	38.82	63.96	19.26	18.75	20.00	19.66	18.97
Greenville, NC MSA	1,125	1.85	23.33	2.97	16.32	10.15	19.71	18.97	40.63	67.90	22.84	17.14	22.41	20.54	23.99
Hickory-Lenoir-Morganton, NC MSA	1,968	3.23	17.58	6.50	19.21	17.02	24.99	22.81	38.22	53.66	19.82	19.88	19.95	18.79	20.25
Jacksonville, NC MSA	1,487	2.44	17.36	2.21	19.59	9.78	24.25	21.14	38.80	66.88	17.03	17.39	21.31	14.25	17.37
Lee-Moore, NC Non-Metro	1,379	2.27	15.68	1.67	14.77	8.00	21.04	18.91	48.51	71.42	23.17	13.92	19.29	21.77	24.74
Rocky Mount, NC MSA	554	0.91	21.93	5.37	16.94	11.98	21.11	24.17	40.02	58.47	18.96	12.24	18.35	23.33	17.81
Southern NC Non-Metro	390	0.64	28.18	3.18	18.21	13.38	21.38	25.48	32.23	57.96	11.47	9.62	12.86	10.88	11.45
Western NC Non-Metro	693	1.14	18.08	2.62	18.10	10.94	24.39	16.80	39.43	69.65	17.50	14.49	13.33	15.92	18.96
Wilmington, NC MSA	4,453	7.31	20.49	3.78	18.06	12.68	22.04	20.76	39.41	62.79	24.52	19.94	22.92	23.60	25.56
Wilson County, NC Non-Metro	439	0.72	21.91	5.36	16.16	12.76	21.21	25.26	40.72	56.63	26.11	29.17	19.39	26.40	27.31

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 15.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Greensboro-High Point, NC MSA	2,018	10.69	66.30	57.88	90.83	5.45	3.72	14.54	18.33	
Northwestern NC Non-Metro	2,480	13.14	68.66	53.95	89.96	5.56	4.48	13.57	16.37	
Raleigh-Cary, NC MSA	4,185	22.18	68.06	59.43	92.14	4.44	3.42	14.34	17.67	
Winston-Salem, NC MSA	1,357	7.19	66.13	57.70	91.08	5.23	3.68	14.46	16.96	
<b>Limited Review:</b>										
Asheville, NC MSA	1,394	7.39	64.63	57.17	89.45	5.52	5.02	15.28	17.86	
Burlington, NC MSA	390	2.07	65.99	48.72	84.10	9.74	6.15	18.18	21.30	
Camden-Pasquotank, NC Non-Metro	146	0.77	67.97	46.58	89.04	4.79	6.16	13.03	13.07	
Dare County, NC Non-Metro	214	1.13	66.72	63.08	90.65	3.27	6.07	18.14	18.73	
Durham-Chapel Hill, NC MSA	1,376	7.29	66.24	60.76	92.30	3.92	3.78	13.75	17.01	
Eastern NC Non-Metro	1,077	5.71	69.52	50.05	90.53	5.57	3.90	17.91	16.18	
Fayetteville, NC MSA	456	2.42	67.20	56.80	87.06	7.24	5.70	9.06	10.20	
Goldensboro, NC MSA	174	0.92	69.59	48.28	92.53	4.60	2.87	12.05	12.21	
Greenville, NC MSA	396	2.10	67.21	44.95	86.36	7.58	6.06	12.98	12.17	
Hickory-Lenoir-Morganton, NC MSA	692	3.67	67.24	52.02	89.02	5.49	5.49	13.02	14.26	
Jacksonville, NC MSA	293	1.55	69.35	49.15	88.74	6.83	4.44	13.84	15.11	
Lee-Moore, NC Non-Metro	228	1.21	66.01	64.04	89.04	3.07	7.89	7.17	8.13	
Rocky Mount, NC MSA	223	1.18	67.37	59.19	88.34	4.48	7.17	12.19	14.31	
Southern NC Non-Metro	202	1.07	66.30	46.53	93.07	2.97	3.96	8.19	7.57	
Western NC Non-Metro	304	1.61	70.02	56.91	94.74	2.63	2.63	15.19	16.75	
Wilmington, NC MSA	1,060	5.62	69.97	58.40	92.08	4.06	3.87	11.04	12.37	
Wilson County, NC Non-Metro	206	1.09	68.34	46.60	86.41	6.31	7.28	15.55	17.23	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 29.3% 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: NORTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Greensboro-High Point, NC MSA	28	7.80	98.30	89.29	96.43	0.00	3.57	23.00	25.61
Northwestern NC Non-Metro	37	10.31	98.43	81.08	94.59	2.70	2.70	10.97	11.76
Raleigh-Cary, NC MSA	36	10.03	95.85	66.67	86.11	13.89	0.00	9.52	8.38
Winston-Salem, NC MSA	10	2.79	98.74	80.00	80.00	0.00	20.00	10.96	12.07
<b>Limited Review:</b>									
Asheville, NC MSA	9	2.51	98.40	88.89	100.00	0.00	0.00	20.00	22.73
Burlington, NC MSA	3	0.84	98.47	66.67	66.67	0.00	33.33	14.29	18.18
Camden-Pasquotank, NC Non-Metro	18	5.01	97.80	83.33	44.44	27.78	27.78	13.48	14.93
Dare County, NC Non-Metro	1	0.28	96.72	100.00	100.00	0.00	0.00	25.00	28.57
Durham-Chapel Hill, NC MSA	32	8.91	96.94	87.50	90.63	6.25	3.13	32.26	42.22
Eastern NC Non-Metro	83	23.12	97.68	67.47	56.63	19.28	24.10	11.25	9.77
Fayetteville, NC MSA	7	1.95	97.32	85.71	71.43	28.57	0.00	13.51	15.38
Goldsboro, NC MSA	7	1.95	96.31	71.43	85.71	14.29	0.00	3.47	2.46
Greenville, NC MSA	34	9.47	96.69	67.65	58.82	35.29	5.88	15.45	15.22
Hickory-Lenoir-Morganton, NC MSA	6	1.67	98.21	100.00	100.00	0.00	0.00	10.91	12.20
Jacksonville, NC MSA	0	0.00	97.13	0.00	0.00	0.00	0.00	6.25	6.67
Lee-Moore, NC Non-Metro	2	0.56	98.59	100.00	100.00	0.00	0.00	1.54	2.38
Rocky Mount, NC MSA	7	1.95	95.63	28.57	42.86	57.14	0.00	4.50	3.57
Southern NC Non-Metro	18	5.01	94.56	72.22	61.11	11.11	27.78	4.84	4.85
Western NC Non-Metro	3	0.84	98.73	33.33	100.00	0.00	0.00	10.00	14.29
Wilmington, NC MSA	10	2.79	96.87	100.00	100.00	0.00	0.00	12.20	17.86
Wilson County, NC Non-Metro	8	2.23	95.45	87.50	50.00	25.00	25.00	12.90	18.18

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 9.2% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NORTH CAROLINA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Greensboro-High Point, NC MSA	2	207	27	21,337	29	21,543	17.18	0	0
Northwestern NC Non-Metro	1	314	31	9,585	32	9,899	7.90	0	0
Raleigh-Cary, NC MSA	3	2,062	73	20,691	76	22,754	18.15	0	0
Winston-Salem, NC MSA	2	1,091	59	4,760	61	5,851	4.67	0	0
<b>Limited Review:</b>									
Asheville, NC MSA	3	5,392	21	282	24	5,674	4.53	0	0
Burlington, NC MSA	1	1,357	2	60	3	1,417	1.13	0	0
Camden-Pasquotank, NC Non-Metro	0	0	2	20	2	20	0.02	0	0
Dare County, NC Non-Metro	0	0	0	0	0	0	0.00	0	0
Durham-Chapel Hill, NC MSA	4	10,532	38	3,430	42	13,962	11.14	0	0
Eastern NC Non-Metro	2	1,817	8	44	10	1,861	1.48	0	0
Fayetteville, NC MSA	3	990	8	26,724	11	27,714	22.11	0	0
Goldsboro, NC MSA	1	425	5	1,138	6	1,563	1.25	0	0
Greenville, NC MSA	0	0	6	56	6	56	0.04	0	0
Hickory-Lenoir-Morganton, NC MSA	2	4,071	7	116	9	4,187	3.34	0	0
Jacksonville, NC MSA	1	180	1	3	2	183	0.15	0	0
Lee-Moore, NC Non-Metro	1	104	2	10	3	114	0.09	0	0
Rocky Mount, NC MSA	0	0	3	24	3	24	0.02	0	0
Southern NC Non-Metro	1	673	0	0	1	673	0.54	0	0
Western NC Non-Metro	0	0	0	0	0	0	0.00	0	0
Wilmington, NC MSA	1	4,242	8	95	9	4,337	3.46	0	0
Wilson County, NC Non-Metro	1	190	3	20	4	210	0.17	0	0
<b>Statewide:</b>									
North Carolina Statewide	1	130	2	3,200	3	3,330	2.66	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NORTH CAROLINA				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography					
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp		
Full Review:																			
Greensboro-High Point, NC MSA	8.98	31	12.81	9.68	22.58	38.71	29.03	0	0	0	0	0	0	6.16	23.07	42.77	28.00		
Northwestern NC Non-Metro	9.94	34	14.05	0.00	26.47	52.94	20.59	1	2	-1	0	0	0	1.64	11.34	59.42	27.60		
Raleigh-Cary, NC MSA	27.60	41	16.94	4.88	17.07	31.71	46.34	0	1	0	-1	0	0	6.12	27.04	36.50	29.97		
Winston-Salem, NC MSA	10.35	20	8.26	10.00	30.00	20.00	40.00	0	0	0	0	0	0	6.33	21.22	40.85	31.59		
Limited Review:																			
Asheville, NC MSA	6.50	16	6.61	6.25	25.00	37.50	31.25	0	0	0	0	0	0	1.72	16.21	63.66	18.41		
Burlington, NC MSA	2.14	6	2.48	0.00	0.00	83.33	16.67	0	0	0	0	0	0	0.00	21.89	47.90	30.21		
Camden-Pasquotank, NC Non-Metro	0.66	2	0.83	0.00	50.00	50.00	0.00	0	0	0	0	0	0	5.85	3.42	30.21	60.52		
Dare County, NC Non-Metro	0.65	3	1.24	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	17.93	82.07		
Durham-Chapel Hill, NC MSA	11.42	17	7.02	5.88	23.53	29.41	41.18	0	0	0	0	0	0	10.26	20.62	35.88	31.78		
Eastern NC Non-Metro	3.75	19	7.85	5.26	10.53	52.63	31.58	0	0	0	0	0	0	3.04	10.04	65.64	21.29		
Fayetteville, NC MSA	1.78	5	2.07	20.00	0.00	80.00	0.00	0	0	0	0	0	0	2.52	13.96	53.82	28.73		
Goldsboro, NC MSA	1.04	3	1.24	33.33	33.33	33.33	0.00	0	0	0	0	0	0	2.30	12.47	62.71	22.52		
Greenville, NC MSA	1.88	5	2.07	0.00	40.00	60.00	0.00	0	0	0	0	0	0	2.61	20.62	45.27	31.50		
Hickory-Lenoir-Morganton, NC MSA	3.54	11	4.55	0.00	27.27	54.55	18.18	0	0	0	0	0	0	0.00	16.86	66.53	16.61		
Jacksonville, NC MSA	0.71	2	0.83	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	8.36	63.06	21.72		
Lee-Moore, NC Non-Metro	1.12	4	1.65	0.00	0.00	50.00	50.00	0	0	0	0	0	0	2.22	5.35	38.00	54.44		
Rocky Mount, NC MSA	0.84	2	0.83	0.00	0.00	50.00	50.00	0	1	0	-1	0	0	0.00	17.34	56.27	26.39		
Southern NC Non-Metro	0.94	4	1.65	0.00	25.00	75.00	0.00	0	0	0	0	0	0	6.55	37.17	54.61	1.66		
Western NC Non-Metro	1.27	6	2.48	0.00	0.00	83.33	16.67	0	0	0	0	0	0	0.00	13.60	74.07	12.33		
Wilmington, NC MSA	4.09	9	3.72	11.11	22.22	22.22	44.44	1	1	0	0	0	0	4.66	16.13	52.94	26.26		
Wilson County, NC Non-Metro	0.79	2	0.83	0.00	0.00	100.00	0.00	0	0	0	0	0	0	11.40	11.60	55.32	21.68		

**Table 1. Lending Volume**

LENDING VOLUME		Geography: NORTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Bismarck, ND MSA	38.74	4,053	656,843	1,759	139,342	314	21,637	0	0	6,126	817,822	42.53
Minot, ND Non-Metro	19.01	2,045	319,782	786	53,119	174	18,429	2	4,776	3,007	396,105	18.68
Limited Review:												
Bowman County, ND Non-Metro	2.86	78	9,669	163	11,507	212	17,575	0	0	453	38,750	3.15
Dickinson, ND Non-Metro	9.28	791	106,121	481	33,246	194	18,033	1	4,200	1,467	161,601	9.96
Jamestown, ND Non-Metro	11.30	541	62,334	663	26,178	582	79,013	1	450	1,787	167,975	13.93
Northeastern ND Non-Metro	4.81	185	14,831	325	16,597	249	25,538	1	88	760	57,054	3.33
Traill County, ND Non-Metro	3.12	245	27,521	101	4,429	148	21,924	0	0	494	53,874	1.21
Wahpeton, ND Non-Metro	10.88	462	54,794	463	40,853	795	98,183	0	0	1,720	193,830	7.21

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: NORTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bismarck, ND MSA	1,326	42.26	0.00	0.00	19.62	9.58	69.12	71.04	11.26	19.38	14.34	0.00	8.20	15.95	12.67
Minot, ND Non-Metro	957	30.50	0.00	0.00	9.91	9.51	66.31	60.50	23.78	29.99	16.54	0.00	17.60	15.56	18.36
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	30	0.96	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	53.33	0.00	0.00	53.33	0.00
Dickinson, ND Non-Metro	309	9.85	0.00	0.00	0.00	0.00	87.99	76.70	12.01	23.30	11.25	0.00	0.00	10.06	16.03
Jamestown, ND Non-Metro	188	5.99	0.00	0.00	0.00	0.00	84.92	84.04	15.08	15.96	11.85	0.00	0.00	11.51	14.29
Northeastern ND Non-Metro	82	2.61	0.00	0.00	0.00	0.00	84.67	84.15	15.33	15.85	23.46	0.00	0.00	22.97	28.57
Traill County, ND Non-Metro	98	3.12	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	32.39	0.00	0.00	32.39	0.00
Wahpeton, ND Non-Metro	148	4.72	0.00	0.00	0.50	0.00	58.72	58.78	40.78	41.22	28.07	0.00	0.00	27.78	28.57

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: NORTH DAKOTA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Bismarck, ND MSA	138	33.91	0.00	0.00	19.62	17.39	69.12	71.01	11.26	11.59	10.14	0.00	20.45	9.76	2.13	
Minot, ND Non-Metro	126	30.96	0.00	0.00	9.91	7.14	66.31	70.63	23.78	22.22	12.12	0.00	16.67	12.82	8.77	
Limited Review:																
Bowman County, ND Non-Metro	1	0.25	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	25.00	0.00	0.00	25.00	0.00	
Dickinson, ND Non-Metro	29	7.13	0.00	0.00	0.00	0.00	87.99	86.21	12.01	13.79	12.94	0.00	0.00	13.16	11.11	
Jamestown, ND Non-Metro	35	8.60	0.00	0.00	0.00	0.00	84.92	82.86	15.08	17.14	7.76	0.00	0.00	8.42	4.76	
Northeastern ND Non-Metro	17	4.18	0.00	0.00	0.00	0.00	84.67	94.12	15.33	5.88	22.22	0.00	0.00	25.00	14.29	
Traill County, ND Non-Metro	20	4.91	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	40.00	0.00	0.00	40.00	0.00	
Wahpeton, ND Non-Metro	41	10.07	0.00	0.00	0.50	0.00	58.72	48.78	40.78	51.22	29.79	0.00	0.00	29.17	30.43	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: NORTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bismarck, ND MSA	2,582	53.44	0.00	0.00	19.62	9.53	69.12	70.95	11.26	19.52	20.40	0.00	20.07	20.41	20.54
Minot, ND Non-Metro	952	19.70	0.00	0.00	9.91	7.88	66.31	58.09	23.78	34.03	21.86	0.00	23.08	20.56	24.18
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	47	0.97	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	50.00	0.00	0.00	50.00	0.00
Dickinson, ND Non-Metro	453	9.38	0.00	0.00	0.00	0.00	87.99	77.48	12.01	22.52	20.74	0.00	0.00	18.30	29.09
Jamestown, ND Non-Metro	315	6.52	0.00	0.00	0.00	0.00	84.92	83.49	15.08	16.51	22.40	0.00	0.00	23.10	19.75
Northeastern ND Non-Metro	84	1.74	0.00	0.00	0.00	0.00	84.67	84.52	15.33	15.48	20.41	0.00	0.00	19.75	23.53
Traill County, ND Non-Metro	126	2.61	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	37.82	0.00	0.00	37.82	0.00
Wahpeton, ND Non-Metro	273	5.65	0.00	0.00	0.50	0.37	58.72	50.92	40.78	48.72	35.21	0.00	0.00	33.04	38.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: NORTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bismarck, ND MSA	7	30.43	0.00	0.00	4.08	0.00	84.44	85.71	11.48	14.29	8.33	0.00	0.00	5.00	100.00
Minot, ND Non-Metro	10	43.48	0.00	0.00	15.07	0.00	71.92	90.00	13.01	10.00	10.00	0.00	0.00	14.29	0.00
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	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
Dickinson, ND Non-Metro	0	0.00	0.00	0.00	0.00	0.00	93.24	0.00	6.76	0.00	0.00	0.00	0.00	0.00	0.00
Jamestown, ND Non-Metro	3	13.04	0.00	0.00	0.00	0.00	93.25	66.67	6.75	33.33	0.00	0.00	0.00	0.00	0.00
Northeastern ND Non-Metro	2	8.70	0.00	0.00	0.00	0.00	84.60	100.00	15.40	0.00	0.00	0.00	0.00	0.00	0.00
Traill County, ND Non-Metro	1	4.35	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
Wahpeton, ND Non-Metro	0	0.00	0.00	0.00	0.00	0.00	93.56	0.00	6.44	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: NORTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Bismarck, ND MSA	1,759	37.10	0.00	0.00	19.30	21.49	68.43	68.73	12.27	9.78	23.97	0.00	21.13	27.20	17.67
Minot, ND Non-Metro	786	16.58	0.00	0.00	7.85	15.01	72.07	63.49	20.08	21.50	19.02	0.00	21.19	21.36	17.06
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	163	3.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	54.26	0.00	0.00	57.95	0.00
Dickinson, ND Non-Metro	481	10.15	0.00	0.00	0.00	0.00	87.49	86.69	12.51	13.31	20.83	0.00	0.00	24.42	10.92
Jamestown, ND Non-Metro	663	13.98	0.00	0.00	0.00	0.00	85.86	88.24	14.14	11.76	21.97	0.00	0.00	23.22	20.21
Northeastern ND Non-Metro	325	6.86	0.00	0.00	0.00	0.00	82.43	97.85	17.57	2.15	20.62	0.00	0.00	25.67	1.75
Traill County, ND Non-Metro	101	2.13	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	28.46	0.00	0.00	32.46	0.00
Wahpeton, ND Non-Metro	463	9.77	0.00	0.00	1.28	0.00	57.58	57.24	41.13	42.76	34.46	0.00	0.00	36.13	33.97

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: NORTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Bismarck, ND MSA	314	11.77	0.00	0.00	29.84	21.66	62.20	70.70	7.96	7.64	59.63	0.00	54.17	67.12	30.00
Minot, ND Non-Metro	174	6.52	0.00	0.00	2.99	4.60	85.71	71.26	11.29	24.14	18.81	0.00	100.00	14.97	37.93
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	212	7.95	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	92.45	0.00	0.00	94.23	0.00
Dickinson, ND Non-Metro	194	7.27	0.00	0.00	0.00	0.00	95.22	96.91	4.78	3.09	26.63	0.00	0.00	26.23	100.00
Jamestown, ND Non-Metro	582	21.81	0.00	0.00	0.00	0.00	76.66	82.30	23.34	17.70	20.29	0.00	0.00	19.57	24.39
Northeastern ND Non-Metro	249	9.33	0.00	0.00	0.00	0.00	86.63	89.56	13.37	10.44	21.95	0.00	0.00	21.01	62.50
Traill County, ND Non-Metro	148	5.55	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	63.46	0.00	0.00	68.75	0.00
Wahpeton, ND Non-Metro	795	29.80	0.00	0.00	1.28	0.00	40.15	25.53	58.57	74.47	54.87	0.00	0.00	48.45	57.68

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: NORTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bismarck, ND MSA	1,326	42.26	17.38	7.35	18.54	24.35	27.27	31.93	36.81	36.37	16.74	9.86	16.58	18.52	18.20
Minot, ND Non-Metro	957	30.50	16.07	2.92	19.29	22.51	24.61	30.41	40.03	44.16	17.89	13.04	16.55	18.21	19.05
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	30	0.96	17.90	3.57	17.03	14.29	27.84	42.86	37.23	39.29	57.14	50.00	0.00	62.50	66.67
Dickinson, ND Non-Metro	309	9.85	17.19	3.30	17.27	18.48	24.48	30.36	41.05	47.85	11.94	9.09	9.57	11.89	13.33
Jamestown, ND Non-Metro	188	5.99	16.03	5.08	17.31	18.64	23.95	35.59	42.71	40.68	12.45	7.14	12.00	15.28	12.16
Northeastern ND Non-Metro	82	2.61	14.62	16.05	16.92	25.93	26.08	35.80	42.37	22.22	24.00	16.67	23.81	24.14	30.77
Traill County, ND Non-Metro	98	3.12	12.48	12.63	13.90	26.32	26.34	29.47	47.28	31.58	32.81	16.67	30.00	37.04	36.36
Wahpeton, ND Non-Metro	148	4.72	12.67	5.56	14.10	28.47	27.06	25.69	46.17	40.28	27.36	12.50	27.59	28.00	33.33

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: NORTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Bismarck, ND MSA	138	33.91	17.38	3.65	18.54	18.25	27.27	27.74	36.81	50.36	10.64	3.33	16.00	9.28	11.43
Minot, ND Non-Metro	126	30.96	16.07	2.42	19.29	20.97	24.61	30.65	40.03	45.97	12.50	0.00	14.29	13.04	13.21
Limited Review:															
Bowman County, ND Non-Metro	1	0.25	17.90	0.00	17.03	100.00	27.84	0.00	37.23	0.00	33.33	0.00	50.00	0.00	0.00
Dickinson, ND Non-Metro	29	7.13	17.19	0.00	17.27	17.86	24.48	21.43	41.05	60.71	13.25	0.00	11.11	12.50	17.14
Jamestown, ND Non-Metro	35	8.60	16.03	11.43	17.31	20.00	23.95	22.86	42.71	45.71	8.33	11.11	5.00	7.89	9.76
Northeastern ND Non-Metro	17	4.18	14.62	0.00	16.92	29.41	26.08	23.53	42.37	47.06	22.22	0.00	25.00	14.29	42.86
Traill County, ND Non-Metro	20	4.91	12.48	5.00	13.90	35.00	26.34	25.00	47.28	35.00	40.00	100.00	66.67	50.00	14.29
Wahpeton, ND Non-Metro	41	10.07	12.67	0.00	14.10	23.08	27.06	25.64	46.17	51.28	27.27	0.00	23.08	27.27	31.58

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: NORTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Bismarck, ND MSA	2,582	53.44	17.38	4.48	18.54	17.44	27.27	31.05	36.81	47.03	23.11	21.95	20.79	24.20	23.70
Minot, ND Non-Metro	952	19.70	16.07	2.10	19.29	14.10	24.61	26.34	40.03	57.46	24.53	19.44	24.63	24.31	25.14
<b>Limited Review:</b>															
Bowman County, ND Non-Metro	47	0.97	17.90	4.88	17.03	9.76	27.84	17.07	37.23	68.29	46.15	0.00	16.67	100.00	46.67
Dickinson, ND Non-Metro	453	9.38	17.19	4.42	17.27	12.09	24.48	27.21	41.05	56.28	22.14	16.13	13.43	20.00	26.70
Jamestown, ND Non-Metro	315	6.52	16.03	1.66	17.31	14.62	23.95	26.58	42.71	57.14	23.78	3.85	25.35	27.18	24.16
Northeastern ND Non-Metro	84	1.74	14.62	2.56	16.92	24.36	26.08	30.77	42.37	42.31	23.81	0.00	47.37	24.00	16.13
Traill County, ND Non-Metro	126	2.61	12.48	2.54	13.90	10.17	26.34	29.66	47.28	57.63	39.22	10.00	66.67	39.47	40.00
Wahpeton, ND Non-Metro	273	5.65	12.67	3.50	14.10	12.45	27.06	22.96	46.17	61.09	38.17	18.18	30.00	39.47	43.30

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 6.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: NORTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Bismarck, ND MSA	1,759	37.10	70.11	63.56	86.07	6.14	7.79	23.97	34.14
Minot, ND Non-Metro	786	16.58	69.38	62.72	91.35	3.44	5.22	19.02	27.17
<b>Limited Review:</b>									
Bowman County, ND Non-Metro	163	3.44	62.38	69.33	84.66	11.04	4.29	54.26	67.31
Dickinson, ND Non-Metro	481	10.15	71.69	59.46	88.57	4.16	7.28	20.83	26.46
Jamestown, ND Non-Metro	663	13.98	71.70	72.40	94.27	3.62	2.11	21.97	33.33
Northeastern ND Non-Metro	325	6.86	64.89	74.15	90.15	6.77	3.08	20.62	41.32
Trail County, ND Non-Metro	101	2.13	66.61	78.22	93.07	4.95	1.98	28.46	53.70
Wahpeton, ND Non-Metro	463	9.77	72.85	67.82	83.80	6.05	10.15	34.46	50.93

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.5% 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: NORTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Bismarck, ND MSA	314	11.77	99.07	77.39	89.17	4.78	6.05	59.63	67.90
Minot, ND Non-Metro	174	6.52	99.59	68.97	63.79	28.74	7.47	18.81	14.69
<b>Limited Review:</b>									
Bowman County, ND Non-Metro	212	7.95	100.00	72.64	75.00	18.87	6.13	92.45	90.91
Dickinson, ND Non-Metro	194	7.27	99.66	76.80	66.49	30.41	3.09	26.63	21.82
Jamestown, ND Non-Metro	582	21.81	98.37	61.34	56.53	28.18	15.29	20.29	22.00
Northeastern ND Non-Metro	249	9.33	96.86	50.20	75.50	14.06	10.44	21.95	13.17
Traill County, ND Non-Metro	148	5.55	98.63	55.41	56.76	17.57	25.68	63.46	66.67
Wahpeton, ND Non-Metro	795	29.80	99.23	65.66	57.36	29.56	13.08	54.87	51.26

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 18.9% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: NORTH DAKOTA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Bismarck, ND MSA	6	3,847	14	2,889	20	7,307	56.69	1	69
Minot, ND Non-Metro	5	609	4	2,229	9	3,408	22.25	0	0
<b>Limited Review:</b>									
Bowman County, ND Non-Metro	0	0	0	0	0	0	0.00	0	0
Dickinson, ND Non-Metro	0	0	1	711	1	711	6.28	0	0
Jamestown, ND Non-Metro	1	1,523	0	0	1	1,523	13.46	0	0
Northeastern ND Non-Metro	0	0	0	0	0	0	0.00	0	0
Trail County, ND Non-Metro	0	0	0	0	0	0	0.00	0	0
Wahpeton, ND Non-Metro	0	0	0	0	0	0	0.00	0	0
<b>Statewide:</b>									
North Dakota Statewide	1	125	1	25	2	150	1.33	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: NORTH DAKOTA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Bismarck, ND MSA	42.53	4	26.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	3.60	7.95	69.18	19.27
Minot, ND Non-Metro	18.68	4	26.67	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	14.57	72.38	13.05
Limited Review:																	
Bowman County, ND Non-Metro	3.15	1	6.67	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	0.00	100.00	0.00
Dickinson, ND Non-Metro	9.96	1	6.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Jamestown, ND Non-Metro	13.93	2	13.33	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	0.00	100.00	0.00
Northeastern ND Non-Metro	3.33	1	6.67	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	0.00	100.00	0.00
Trails County, ND Non-Metro	1.21	1	6.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Wahpeton, ND Non-Metro	7.21	1	6.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	62.07	37.93

**Table 1. Lending Volume**

LENDING VOLUME		Geography: OHIO						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
<b>Full Review:</b>												
Van Wert, OH Non-Metro	3.32	239	23,634	342	7,906	225	21,997	0	0	806	53,537	100.00
<b>Limited Review:</b>												
Cleveland-Elyria-Mentor, OH MSA	96.68	19,252	2,975,349	4,166	155,663	40	1,272	0	0	23,458	3,132,284	0.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	84	0.88	0.00	0.00	4.45	10.71	79.08	75.00	16.47	14.29	12.69	0.00	30.77	11.64	10.53
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	9,433	99.12	4.83	1.29	12.41	6.92	48.22	49.49	34.54	42.30	14.53	11.78	17.85	15.36	13.25

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	12	6.15	0.00	0.00	4.45	0.00	79.08	83.33	16.47	16.67	9.09	0.00	0.00	8.00	14.29
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	183	93.85	4.83	3.28	12.41	13.66	48.22	39.34	34.54	43.72	3.66	2.35	5.34	3.01	4.04

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	143	1.46	0.00	0.00	4.45	2.10	79.08	76.92	16.47	20.98	7.43	0.00	0.00	7.58	7.27
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	9,634	98.54	4.83	0.94	12.41	4.17	48.22	41.54	34.54	53.34	8.36	10.96	9.66	9.15	7.68

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	0	0.00	0.00	0.00	36.71	0.00	58.45	0.00	4.83	0.00	0.00	0.00	0.00	0.00	0.00
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	2	100.00	12.81	0.00	25.25	0.00	44.29	100.00	17.66	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Van Wert, OH Non-Metro	342	7.64	0.00	0.00	6.84	6.14	80.06	79.53	13.11	14.33	21.80	0.00	28.13	21.32	21.67
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	4,137	92.36	6.40	3.87	13.31	11.58	40.66	40.73	38.74	43.82	2.92	2.14	2.75	3.19	2.91

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Van Wert, OH Non-Metro	225	84.91	0.00	0.00	1.08	0.00	75.95	78.22	22.97	21.78	42.17	0.00	0.00	45.16	35.00
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	40	15.09	1.81	0.00	6.21	0.00	52.22	65.00	39.69	35.00	13.64	0.00	0.00	18.92	7.69

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	84	0.88	12.22	14.49	19.57	36.23	27.43	21.74	40.79	27.54	8.43	9.38	11.86	2.94	7.32
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	9,433	99.12	20.34	12.60	18.08	27.43	22.21	26.22	39.37	33.75	14.34	14.75	15.19	15.30	13.02

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	12	6.15	12.22	8.33	19.57	41.67	27.43	16.67	40.79	33.33	9.38	0.00	33.33	0.00	10.53
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	183	93.85	20.34	10.20	18.08	17.69	22.21	21.77	39.37	50.34	1.98	1.73	1.66	1.28	2.86

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 18.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Van Wert, OH Non-Metro	143	1.46	12.22	4.20	19.57	26.05	27.43	26.89	40.79	42.86	5.44	4.17	5.88	5.06	5.69
<b>Limited Review:</b>															
Cleveland-Elyria-Mentor, OH MSA	9,634	98.54	20.34	5.15	18.08	14.79	22.21	24.24	39.37	55.82	7.39	6.40	6.55	7.25	7.78

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 21.0% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: OHIO			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Van Wert, OH Non-Metro	342	7.59	66.01	74.56	97.66	1.46	0.88	21.80	32.40
<b>Limited Review:</b>									
Cleveland-Elyria-Mentor, OH MSA	4,166	92.41	64.75	75.61	95.73	3.53	0.74	2.92	5.47

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 7.5% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OHIO				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Van Wert, OH Non-Metro	225	84.91	99.19	43.11	74.67	17.33	8.00	42.17	30.00	
Limited Review:										
Cleveland-Elyria-Mentor, OH MSA	40	15.09	97.38	90.00	90.00	10.00	0.00	13.64	30.43	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 43.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: OHIO		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Van Wert, OH Non-Metro	0	0	2	1	2	1	0.01	0	0
<b>Limited Review:</b>									
Cleveland-Elyria-Mentor, OH MSA	0	0	13	8,551	13	8,551	76.55	0	0
<b>Statewide:</b>									
Ohio Statewide	1	2,618	0	0	1	2,618	23.44	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OHIO								Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Van Wert, OH Non-Metro	100.00	1	50.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	12.43	71.86	15.71
Limited Review:																	
Cleveland-Elvria-Mentor, OH MSA	0.00	1	50.00	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.38	17.42	38.71	33.49

**Table 1. Lending Volume**

LENDING VOLUME		Geography: OREGON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***	
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)		
Full Review:													
Eugene-Springfield, OR MSA	17.49	11,563	2,306,573	3,490	140,479	108	3,346	2	7,841	15,163	2,458,239	19.88	
Salem, OR MSA	20.91	13,676	2,580,695	4,164	166,276	285	12,292	3	4,313	18,128	2,763,577	21.82	
Southwestern OR Non-Metro	11.52	6,879	1,230,171	2,943	94,981	165	6,193	3	12,060	9,990	1,343,406	11.32	
Limited Review:													
Bend, OR MSA	12.88	7,591	1,711,056	3,479	137,940	92	2,275	2	9,600	11,164	1,860,870	14.26	
Coastal OR Non-Metro	6.74	4,448	999,953	1,249	41,489	147	4,601	2	500	5,846	1,046,542	4.08	
Corvallis, OR MSA	4.53	2,613	569,038	1,263	38,432	47	753	0	0	3,923	608,223	5.89	
Eastern OR Non-Metro	4.85	3,076	439,082	989	36,461	139	6,670	2	3,150	4,206	485,363	2.99	
Medford, OR MSA	10.70	5,475	1,136,022	3,639	113,438	157	4,768	2	8,495	9,273	1,262,723	11.41	
Northern OR Non-Metro	10.37	6,250	1,103,997	2,506	94,210	230	9,925	3	10,102	8,989	1,218,233	8.33	

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: OREGON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Eugene-Springfield, OR MSA	3,397	17.75	0.53	0.71	10.64	10.13	65.10	62.94	23.73	26.23	19.48	22.22	16.79	19.76	19.79
Salem, OR MSA	3,968	20.73	0.09	0.08	14.36	15.15	59.70	51.26	25.85	33.52	25.01	33.33	28.28	22.98	27.15
Southwestern OR Non-Metro	2,072	10.82	0.00	0.00	13.29	13.66	74.85	73.12	11.86	13.22	17.42	0.00	30.19	16.26	11.81
Limited Review:															
Bend, OR MSA	3,000	15.67	0.00	0.00	18.64	15.40	48.92	47.77	32.44	36.83	22.37	0.00	22.28	21.83	23.18
Coastal OR Non-Metro	1,147	5.99	0.00	0.00	3.49	9.76	81.22	77.16	15.29	13.08	20.84	0.00	31.31	20.26	18.65
Corvallis, OR MSA	687	3.59	0.00	0.00	26.55	27.51	28.42	21.40	45.02	51.09	18.36	0.00	21.40	14.21	18.52
Eastern OR Non-Metro	1,014	5.30	0.00	0.00	5.20	2.56	79.35	81.76	15.45	15.68	19.18	0.00	10.00	20.66	14.10
Medford, OR MSA	2,038	10.65	0.31	0.29	15.60	16.98	56.76	55.50	27.33	27.23	18.87	25.00	19.56	17.99	20.28
Northern OR Non-Metro	1,818	9.50	0.00	0.00	0.85	0.00	72.51	74.37	26.64	25.63	21.92	0.00	0.00	22.27	20.83

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: OREGON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Eugene-Springfield, OR MSA	3,397	17.75	0.53	0.71	10.64	10.13	65.10	62.94	23.73	26.23	19.48	22.22	16.79	19.76	19.79
Salem, OR MSA	3,968	20.73	0.09	0.08	14.36	15.15	59.70	51.26	25.85	33.52	25.01	33.33	28.28	22.98	27.15
Southwestern OR Non-Metro	2,072	10.82	0.00	0.00	13.29	13.66	74.85	73.12	11.86	13.22	17.42	0.00	30.19	16.26	11.81
Limited Review:															
Bend, OR MSA	3,000	15.67	0.00	0.00	18.64	15.40	48.92	47.77	32.44	36.83	22.37	0.00	22.28	21.83	23.18
Coastal OR Non-Metro	1,147	5.99	0.00	0.00	3.49	9.76	81.22	77.16	15.29	13.08	20.84	0.00	31.31	20.26	18.65
Corvallis, OR MSA	687	3.59	0.00	0.00	26.55	27.51	28.42	21.40	45.02	51.09	18.36	0.00	21.40	14.21	18.52
Eastern OR Non-Metro	1,014	5.30	0.00	0.00	5.20	2.56	79.35	81.76	15.45	15.68	19.18	0.00	10.00	20.66	14.10
Medford, OR MSA	2,038	10.65	0.31	0.29	15.60	16.98	56.76	55.50	27.33	27.23	18.87	25.00	19.56	17.99	20.28
Northern OR Non-Metro	1,818	9.50	0.00	0.00	0.85	0.00	72.51	74.37	26.64	25.63	21.92	0.00	0.00	22.27	20.83

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: OREGON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Eugene-Springfield, OR MSA	295	17.71	0.53	0.34	10.64	6.78	65.10	58.98	23.73	33.90	29.19	0.00	14.81	31.06	32.00
Salem, OR MSA	346	20.77	0.09	0.29	14.36	13.58	59.70	56.36	25.85	29.77	28.13	0.00	32.35	32.00	18.46
Southwestern OR Non-Metro	184	11.04	0.00	0.00	13.29	13.59	74.85	75.54	11.86	10.87	20.22	0.00	52.63	17.27	10.00
Limited Review:															
Bend, OR MSA	149	8.94	0.00	0.00	18.64	20.13	48.92	41.61	32.44	38.26	36.51	0.00	28.57	42.31	34.78
Coastal OR Non-Metro	218	13.09	0.00	0.00	3.49	2.75	81.22	83.94	15.29	13.30	31.93	0.00	100.00	31.63	30.00
Corvallis, OR MSA	75	4.50	0.00	0.00	26.55	20.00	28.42	22.67	45.02	57.33	21.82	0.00	15.38	9.09	29.03
Eastern OR Non-Metro	108	6.48	0.00	0.00	5.20	1.85	79.35	84.26	15.45	13.89	12.67	0.00	25.00	13.79	6.67
Medford, OR MSA	100	6.00	0.31	0.00	15.60	10.00	56.76	53.00	27.33	37.00	17.92	0.00	22.73	18.18	13.79
Northern OR Non-Metro	191	11.46	0.00	0.00	0.85	0.00	72.51	75.39	26.64	24.61	24.79	0.00	0.00	25.32	23.81

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Eugene-Springfield, OR MSA	7,864	19.31	0.53	0.39	10.64	7.53	65.10	62.54	23.73	29.54	23.92	27.78	24.72	24.19	23.06
Salem, OR MSA	9,351	22.96	0.09	0.10	14.36	10.58	59.70	55.97	25.85	33.35	27.86	14.29	28.92	27.21	28.66
Southwestern OR Non-Metro	4,620	11.34	0.00	0.00	13.29	12.19	74.85	73.42	11.86	14.39	21.46	0.00	40.95	19.35	16.05
Limited Review:															
Bend, OR MSA	4,442	10.91	0.00	0.00	18.64	14.45	48.92	41.60	32.44	43.94	24.89	0.00	23.39	27.16	23.29
Coastal OR Non-Metro	3,080	7.56	0.00	0.00	3.49	5.75	81.22	76.56	15.29	17.69	24.26	0.00	28.07	23.70	26.10
Corvallis, OR MSA	1,846	4.53	0.00	0.00	26.55	20.86	28.42	23.13	45.02	56.01	22.79	0.00	23.21	23.60	22.22
Eastern OR Non-Metro	1,950	4.79	0.00	0.00	5.20	2.56	79.35	78.05	15.45	19.38	24.62	0.00	19.70	24.11	27.66
Medford, OR MSA	3,333	8.18	0.31	0.06	15.60	12.48	56.76	52.81	27.33	34.65	21.13	20.00	24.70	21.43	19.50
Northern OR Non-Metro	4,241	10.41	0.00	0.00	0.85	0.00	72.51	69.54	26.64	30.46	26.43	0.00	0.00	27.12	25.09

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Eugene-Springfield, OR MSA	7	18.92	14.02	28.57	28.02	28.57	42.14	28.57	15.82	14.29	3.85	0.00	0.00	7.69	0.00
Salem, OR MSA	11	29.73	0.46	0.00	40.27	45.45	41.61	36.36	17.66	18.18	9.68	0.00	22.22	0.00	16.67
Southwestern OR Non-Metro	3	8.11	0.00	0.00	16.83	0.00	72.89	100.00	10.28	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	27.32	0.00	57.45	0.00	15.23	0.00	0.00	0.00	0.00	0.00	0.00
Coastal OR Non-Metro	3	8.11	0.00	0.00	19.01	0.00	72.45	100.00	8.55	0.00	0.00	0.00	0.00	0.00	0.00
Corvallis, OR MSA	5	13.51	0.00	0.00	69.50	80.00	11.08	0.00	19.41	20.00	11.11	0.00	11.11	0.00	0.00
Eastern OR Non-Metro	4	10.81	0.00	0.00	7.39	50.00	73.47	50.00	19.14	0.00	14.29	0.00	0.00	14.29	0.00
Medford, OR MSA	4	10.81	4.18	0.00	38.22	50.00	32.71	50.00	24.89	0.00	0.00	0.00	0.00	0.00	0.00
Northern OR Non-Metro	0	0.00	0.00	0.00	0.11	0.00	80.10	0.00	19.79	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Eugene-Springfield, OR MSA	3,490	14.71	4.10	5.33	16.15	17.79	57.63	54.99	22.12	21.89	14.70	13.36	13.40	15.95	15.34
Salem, OR MSA	4,164	17.55	0.24	0.17	20.52	20.56	56.65	55.28	22.58	23.99	17.66	25.00	15.81	19.09	18.37
Southwestern OR Non-Metro	2,943	12.41	0.00	0.00	14.21	27.52	70.96	62.90	14.83	9.58	16.35	0.00	27.57	14.91	17.39
<b>Limited Review:</b>															
Bend, OR MSA	3,479	14.67	0.00	0.00	20.66	15.52	44.06	40.93	35.28	43.55	21.12	0.00	14.95	23.96	22.55
Coastal OR Non-Metro	1,249	5.27	0.00	0.00	6.54	10.17	78.48	76.86	14.97	12.97	16.93	0.00	15.82	17.49	21.65
Corvallis, OR MSA	1,263	5.32	0.00	0.00	41.84	45.61	23.27	24.94	34.89	29.45	25.68	0.00	28.90	32.07	19.43
Eastern OR Non-Metro	989	4.17	0.00	0.00	6.93	9.10	79.55	68.66	13.52	22.24	13.12	0.00	15.33	12.18	20.17
Medford, OR MSA	3,639	15.34	5.09	4.15	21.11	26.02	49.48	46.36	24.32	23.47	20.38	13.73	18.89	22.93	20.32
Northern OR Non-Metro	2,506	10.56	0.00	0.00	0.51	0.08	76.04	78.41	23.45	21.51	19.25	0.00	30.00	19.41	21.04

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
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>															
Eugene-Springfield, OR MSA	108	7.88	1.34	0.00	8.25	0.93	70.59	60.19	19.82	38.89	55.22	0.00	0.00	54.55	65.00
Salem, OR MSA	285	20.80	0.09	0.00	8.04	3.16	72.74	67.02	19.13	29.82	25.66	0.00	20.00	21.59	43.28
Southwestern OR Non-Metro	165	12.04	0.00	0.00	15.22	23.64	71.30	60.00	13.48	16.36	35.95	0.00	55.56	32.08	39.29
<b>Limited Review:</b>															
Bend, OR MSA	92	6.72	0.00	0.00	13.70	6.52	48.86	43.48	37.44	50.00	58.82	0.00	50.00	55.17	65.00
Coastal OR Non-Metro	147	10.73	0.00	0.00	2.13	1.36	79.15	78.23	18.72	20.41	33.04	0.00	100.00	30.34	40.91
Corvallis, OR MSA	47	3.43	0.00	0.00	20.90	10.64	53.52	51.06	25.59	38.30	44.44	0.00	50.00	36.67	66.67
Eastern OR Non-Metro	139	10.15	0.00	0.00	4.67	5.76	85.13	87.05	10.20	7.19	9.66	0.00	8.33	10.22	6.52
Medford, OR MSA	157	11.46	1.93	3.18	14.34	22.29	59.01	56.69	24.72	17.83	53.95	100.00	33.33	60.00	61.54
Northern OR Non-Metro	230	16.79	0.00	0.00	0.16	0.00	73.67	81.74	26.17	18.26	21.76	0.00	0.00	21.03	27.27

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Eugene-Springfield, OR MSA	3,397	17.75	19.02	4.53	18.57	22.45	22.91	30.64	39.49	42.38	19.55	16.98	17.27	19.59	21.30
Salem, OR MSA	3,968	20.73	18.49	5.56	18.97	24.03	23.62	31.93	38.92	38.48	24.58	27.65	24.13	22.73	25.71
Southwestern OR Non-Metro	2,072	10.82	20.90	3.93	19.27	19.11	22.72	28.87	37.11	48.08	17.17	13.10	15.83	16.84	19.39
<b>Limited Review:</b>															
Bend, OR MSA	3,000	15.67	17.37	6.25	20.54	18.67	22.66	23.44	39.43	51.65	23.28	21.15	20.38	23.55	25.05
Coastal OR Non-Metro	1,147	5.99	18.12	2.13	17.94	6.84	22.35	17.07	41.59	73.96	21.85	24.39	20.13	20.50	22.57
Corvallis, OR MSA	687	3.59	19.62	3.55	18.42	17.31	22.30	29.73	39.65	49.41	19.40	14.00	15.20	21.92	20.26
Eastern OR Non-Metro	1,014	5.30	18.85	4.70	18.84	19.20	22.97	28.91	39.34	47.19	19.52	16.67	13.94	18.12	25.54
Medford, OR MSA	2,038	10.65	19.34	6.15	18.89	19.29	21.45	28.26	40.32	46.30	19.55	20.45	17.86	19.33	20.59
Northern OR Non-Metro	1,818	9.50	16.44	4.35	17.28	17.33	22.94	27.75	43.33	50.57	21.59	24.31	21.60	18.07	23.73

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Eugene-Springfield, OR MSA	295	17.71	19.02	3.17	18.57	20.77	22.91	25.70	39.49	50.35	28.93	23.53	42.00	21.74	26.19
Salem, OR MSA	346	20.77	18.49	8.12	18.97	16.52	23.62	25.22	38.92	50.14	28.97	31.25	35.90	26.79	27.18
Southwestern OR Non-Metro	184	11.04	20.90	7.07	19.27	15.22	22.72	29.35	37.11	48.37	21.82	25.00	27.91	23.91	15.00
<b>Limited Review:</b>															
Bend, OR MSA	149	8.94	17.37	8.78	20.54	10.14	22.66	26.35	39.43	54.73	41.07	42.86	28.57	25.00	50.00
Coastal OR Non-Metro	218	13.09	18.12	1.86	17.94	10.70	22.35	24.19	41.59	63.26	32.46	42.86	30.77	35.48	30.16
Corvallis, OR MSA	75	4.50	19.62	2.67	18.42	18.67	22.30	33.33	39.65	45.33	22.22	0.00	15.38	42.86	22.58
Eastern OR Non-Metro	108	6.48	18.85	2.78	18.84	13.89	22.97	26.85	39.34	56.48	13.29	9.09	25.00	3.57	13.16
Medford, OR MSA	100	6.00	19.34	5.00	18.89	14.00	21.45	23.00	40.32	58.00	19.59	12.50	10.00	8.00	31.82
Northern OR Non-Metro	191	11.46	16.44	2.13	17.28	13.30	22.94	20.74	43.33	63.83	24.32	12.50	34.78	26.67	20.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: OREGON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Eugene-Springfield, OR MSA	7,864	19.31	19.02	3.84	18.57	15.96	22.91	27.65	39.49	52.55	25.05	19.26	22.71	24.81	26.72
Salem, OR MSA	9,351	22.96	18.49	3.52	18.97	14.97	23.62	27.86	38.92	53.66	28.99	24.44	26.06	27.62	31.43
Southwestern OR Non-Metro	4,620	11.34	20.90	3.65	19.27	14.44	22.72	26.17	37.11	55.75	22.28	14.67	18.24	22.60	24.64
<b>Limited Review:</b>															
Bend, OR MSA	4,442	10.91	17.37	3.97	20.54	13.46	22.66	21.71	39.43	60.87	27.58	20.90	25.68	26.53	29.20
Coastal OR Non-Metro	3,080	7.56	18.12	1.79	17.94	8.20	22.35	17.98	41.59	72.03	26.64	13.89	20.93	23.32	29.61
Corvallis, OR MSA	1,846	4.53	19.62	4.53	18.42	15.64	22.30	27.10	39.65	52.73	24.29	22.68	23.87	20.78	26.75
Eastern OR Non-Metro	1,950	4.79	18.85	3.38	18.84	13.10	22.97	25.71	39.34	57.82	26.18	21.52	24.07	24.54	28.17
Medford, OR MSA	3,333	8.18	19.34	3.42	18.89	14.12	21.45	25.12	40.32	57.35	22.60	21.67	20.48	21.75	23.82
Northern OR Non-Metro	4,241	10.41	16.44	2.20	17.28	11.95	22.94	24.92	43.33	60.92	26.72	21.32	26.20	25.56	27.98

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 12.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: OREGON			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Eugene-Springfield, OR MSA	3,490	14.71	70.00	74.15	94.30	3.84	1.86	14.70	24.84	
Salem, OR MSA	4,164	17.55	70.24	70.58	94.21	3.87	1.92	17.66	27.90	
Southwestern OR Non-Metro	2,943	12.41	68.10	76.55	96.43	2.72	0.85	16.35	24.95	
<b>Limited Review:</b>										
Bend, OR MSA	3,479	14.67	71.63	76.26	94.14	3.74	2.13	21.12	32.57	
Coastal OR Non-Metro	1,249	5.27	71.99	76.30	96.88	2.16	0.96	16.93	24.58	
Corvallis, OR MSA	1,263	5.32	68.07	76.33	96.52	2.61	0.87	25.68	38.29	
Eastern OR Non-Metro	989	4.17	70.51	71.69	96.56	1.52	1.92	13.12	19.71	
Medford, OR MSA	3,639	15.34	72.66	75.76	95.91	3.30	0.80	20.38	33.19	
Northern OR Non-Metro	2,506	10.56	70.38	77.02	94.73	3.63	1.64	19.25	32.00	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 13.7% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS			Geography: OREGON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*		
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
Full Review:										
Eugene-Springfield, OR MSA	108	7.88	97.25	88.89	98.15	0.93	0.93	55.22	72.09	
Salem, OR MSA	285	20.80	93.39	67.02	94.74	3.86	1.40	25.66	30.94	
Southwestern OR Non-Metro	165	12.04	97.09	78.79	95.15	4.24	0.61	35.95	38.26	
Limited Review:										
Bend, OR MSA	92	6.72	97.95	80.43	98.91	1.09	0.00	58.82	67.65	
Coastal OR Non-Metro	147	10.73	97.21	73.47	97.96	1.36	0.68	33.04	46.03	
Corvallis, OR MSA	47	3.43	96.48	72.34	100.00	0.00	0.00	44.44	51.85	
Eastern OR Non-Metro	139	10.15	96.08	84.17	89.21	8.63	2.16	9.66	10.75	
Medford, OR MSA	157	11.46	97.61	80.25	95.54	3.18	1.27	53.95	83.33	
Northern OR Non-Metro	230	16.79	96.29	77.83	93.91	4.35	1.74	21.76	26.11	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 13.6% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: OREGON		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Eugene-Springfield, OR MSA	4	1,384	23	8,730	27	10,114	9.22	0	0
Salem, OR MSA	5	2,495	16	15,447	21	17,942	16.36	1	14
Southwestern OR Non-Metro	10	4,935	9	15,946	19	20,881	19.04	0	0
<b>Limited Review:</b>									
Bend, OR MSA	3	476	14	1,699	17	2,175	1.98	0	0
Coastal OR Non-Metro	1	752	5	65	7	817	0.74	0	0
Corvallis, OR MSA	0	0	2	6	2	6	0.01	0	0
Eastern OR Non-Metro	7	3,156	4	25,536	11	28,692	26.16	0	0
Medford, OR MSA	0	0	9	4,358	9	4,358	3.97	0	0
Northern OR Non-Metro	2	657	6	17,525	8	18,182	16.58	0	0
<b>Statewide:</b>									
Oregon Statewide	3	5,461	2	1,047	5	6,508	5.93	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: OREGON																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
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>																	
Eugene-Springfield, OR MSA	19.88	8	13.33	0.00	50.00	50.00	0.00	0	0	0	0	0	0	2.90	21.40	53.69	22.01
Salem, OR MSA	21.82	14	23.33	0.00	35.71	57.14	7.14	0	1	0	0	-1	0	0.00	21.03	56.99	21.98
Southwestern OR Non-Metro	11.32	6	10.00	16.67	0.00	66.67	16.67	0	0	0	0	0	0	1.04	11.53	78.00	9.42
<b>Limited Review:</b>																	
Bend, OR MSA	14.26	5	8.33	0.00	40.00	60.00	0.00	0	0	0	0	0	0	0.00	15.70	64.32	19.99
Coastal OR Non-Metro	4.08	4	6.67	0.00	0.00	75.00	25.00	0	0	0	0	0	0	0.00	5.54	75.68	18.78
Corvallis, OR MSA	5.89	3	5.00	33.33	0.00	33.33	33.33	0	0	0	0	0	0	6.43	32.25	36.77	24.54
Eastern OR Non-Metro	2.99	4	6.67	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	8.26	81.92	9.82
Medford, OR MSA	11.41	8	13.33	12.50	12.50	75.00	0.00	1	0	0	0	1	0	0.88	11.86	69.85	17.41
Northern OR Non-Metro	8.33	8	13.33	0.00	12.50	87.50	0.00	0	0	0	0	0	0	0.00	9.40	63.48	27.12

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: PENNSYLVANIA												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Philadelphia, PA MD	64.94	60,026	13,307,420	12,010	696,393	64	2,636	21	88,143	72,121	14,094,592	79.33
Limited Review:												
Harrisburg-Carlisle, PA MSA	6.55	6,637	1,092,616	623	34,656	16	328	2	11,000	7,278	1,138,599	3.65
Lancaster, PA MSA	7.31	7,215	1,161,866	883	46,547	23	620	1	1,875	8,122	1,210,908	3.14
Lebanon, PA MSA	1.41	1,338	203,052	224	14,459	3	120	0	0	1,565	217,631	1.18
Monroe-Wayne, PA Non-Metro	2.25	2,213	350,727	290	9,102	1	6	0	0	2,504	359,835	0.78
Northumberland-Schuylkill, PA Non-Metro	1.50	1,259	147,127	391	13,352	11	391	0	0	1,661	160,870	1.42
Reading, PA MSA	5.57	5,183	811,066	975	62,794	24	1,899	2	250	6,184	876,009	5.18
Scranton--Wilkes-Barre, PA MSA	4.36	3,718	515,965	1,105	64,388	16	971	2	1,300	4,841	582,624	3.73
York-Hanover, PA MSA	6.11	6,260	1,041,563	515	28,105	9	213	0	0	6,784	1,069,881	1.59

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	19,043	60.15	8.68	3.81	18.44	17.09	33.17	33.36	39.71	45.74	23.99	22.57	25.46	23.97	23.60
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	2,447	7.73	1.55	0.69	13.09	11.32	62.34	56.64	23.01	31.34	21.74	28.30	22.97	20.48	23.51
Lancaster, PA MSA	2,594	8.19	1.17	1.35	6.39	9.02	81.91	77.95	10.53	11.68	23.92	27.50	27.59	23.72	22.49
Lebanon, PA MSA	504	1.59	0.00	0.00	11.94	11.31	69.36	63.89	18.70	24.80	20.04	0.00	26.71	18.47	21.49
Monroe-Wayne, PA Non-Metro	930	2.94	0.00	0.00	0.00	0.00	51.95	56.24	48.05	43.76	24.10	0.00	0.00	20.80	28.75
Northumberland-Schuylkill, PA Non-Metro	583	1.84	0.00	0.00	13.67	12.01	77.89	77.19	8.44	10.81	20.47	0.00	23.64	20.60	17.47
Reading, PA MSA	1,856	5.86	3.01	1.51	10.08	7.33	70.43	68.86	16.49	22.31	24.50	24.36	27.15	23.77	25.99
Scranton--Wilkes-Barre, PA MSA	1,275	4.03	0.03	0.00	7.89	5.80	74.88	65.65	17.20	28.55	16.58	0.00	15.10	15.94	18.80
York-Hanover, PA MSA	2,429	7.67	1.50	1.93	5.60	6.30	84.99	83.29	7.91	8.48	23.12	38.30	32.38	22.62	20.64

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Philadelphia, PA MD	1,458	62.66	8.68	5.21	18.44	14.06	33.17	30.52	39.71	50.21	11.06	7.43	8.79	10.07	13.75
Limited Review:															
Harrisburg-Carlisle, PA MSA	158	6.79	1.55	0.00	13.09	6.96	62.34	60.13	23.01	32.91	6.31	0.00	3.39	5.91	8.93
Lancaster, PA MSA	180	7.74	1.17	0.00	6.39	5.00	81.91	87.22	10.53	7.78	10.02	0.00	8.33	10.68	6.60
Lebanon, PA MSA	46	1.98	0.00	0.00	11.94	15.22	69.36	63.04	18.70	21.74	9.06	0.00	23.08	7.55	8.33
Monroe-Wayne, PA Non-Metro	32	1.38	0.00	0.00	0.00	0.00	51.95	65.63	48.05	34.38	3.68	0.00	0.00	3.95	3.16
Northumberland-Schuylkill, PA Non-Metro	48	2.06	0.00	0.00	13.67	12.50	77.89	70.83	8.44	16.67	6.25	0.00	2.00	6.08	13.51
Reading, PA MSA	120	5.16	3.01	1.67	10.08	5.83	70.43	70.83	16.49	21.67	7.58	2.78	4.00	8.47	8.63
Scranton--Wilkes-Barre, PA MSA	140	6.02	0.03	0.00	7.89	2.14	74.88	59.29	17.20	38.57	3.98	0.00	1.60	2.83	9.76
York-Hanover, PA MSA	145	6.23	1.50	1.38	5.60	4.83	84.99	79.31	7.91	14.48	7.86	5.88	6.52	7.51	11.43

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	39,509	66.03	8.68	1.46	18.44	7.40	33.17	29.12	39.71	62.02	21.17	16.78	18.91	20.95	21.76
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	4,031	6.74	1.55	0.45	13.09	7.29	62.34	58.27	23.01	33.99	15.87	15.87	15.69	15.43	16.76
Lancaster, PA MSA	4,437	7.42	1.17	0.32	6.39	3.16	81.91	81.79	10.53	14.74	22.67	19.64	23.53	22.62	22.84
Lebanon, PA MSA	788	1.32	0.00	0.00	11.94	5.71	69.36	63.96	18.70	30.33	15.64	0.00	17.24	14.81	17.27
Monroe-Wayne, PA Non-Metro	1,251	2.09	0.00	0.00	0.00	0.00	51.95	54.20	48.05	45.80	16.79	0.00	0.00	16.20	17.48
Northumberland-Schuylkill, PA Non-Metro	628	1.05	0.00	0.00	13.67	7.48	77.89	75.00	8.44	17.52	15.73	0.00	18.35	15.34	16.72
Reading, PA MSA	3,204	5.35	3.01	0.59	10.08	2.03	70.43	72.78	16.49	24.59	22.60	22.45	23.81	22.14	23.94
Scranton--Wilkes-Barre, PA MSA	2,302	3.85	0.03	0.00	7.89	3.48	74.88	60.95	17.20	35.58	16.72	0.00	14.84	15.62	19.34
York-Hanover, PA MSA	3,684	6.16	1.50	1.03	5.60	2.12	84.99	84.17	7.91	12.68	18.93	31.82	20.28	18.87	18.38

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	11	50.00	7.67	0.00	21.08	36.36	39.16	9.09	32.08	54.55	1.44	0.00	2.47	0.00	3.23
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	1	4.55	6.40	0.00	23.25	100.00	55.26	0.00	15.09	0.00	0.00	0.00	0.00	0.00	0.00
Lancaster, PA MSA	4	18.18	8.06	0.00	11.61	50.00	67.83	50.00	12.49	0.00	7.32	0.00	22.22	3.57	0.00
Lebanon, PA MSA	0	0.00	0.00	0.00	37.39	0.00	48.01	0.00	14.60	0.00	0.00	0.00	0.00	0.00	0.00
Monroe-Wayne, PA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	66.88	0.00	33.12	0.00	0.00	0.00	0.00	0.00	0.00
Northumberland-Schuylkill, PA Non-Metro	0	0.00	0.00	0.00	30.55	0.00	64.06	0.00	5.39	0.00	0.00	0.00	0.00	0.00	0.00
Reading, PA MSA	3	13.64	24.92	0.00	11.67	0.00	47.61	66.67	15.81	33.33	0.00	0.00	0.00	0.00	0.00
Scranton--Wilkes-Barre, PA MSA	1	4.55	6.46	0.00	23.06	0.00	60.87	0.00	9.60	100.00	0.00	0.00	0.00	0.00	0.00
York-Hanover, PA MSA	2	9.09	10.18	0.00	15.29	0.00	73.13	100.00	1.41	0.00	3.33	0.00	0.00	4.55	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Philadelphia, PA MD	11,951	70.48	7.35	4.07	15.75	11.24	29.30	28.73	46.94	55.95	11.93	12.31	11.93	11.81	12.37
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	623	3.67	2.10	0.96	14.07	15.41	61.68	63.24	22.15	20.39	5.19	2.15	6.64	5.30	4.87
Lancaster, PA MSA	883	5.21	3.28	3.96	7.19	7.70	77.05	71.23	12.48	17.10	6.35	15.45	7.51	5.82	8.76
Lebanon, PA MSA	224	1.32	0.00	0.00	14.38	16.96	67.22	66.07	18.41	16.96	9.76	0.00	13.58	9.21	11.95
Monroe-Wayne, PA Non-Metro	290	1.71	0.00	0.00	0.00	0.00	56.49	50.69	43.51	49.31	8.34	0.00	0.00	9.27	9.41
Northumberland-Schuylkill, PA Non-Metro	391	2.31	0.00	0.00	16.07	12.79	73.92	78.26	10.01	8.95	9.70	0.00	10.61	10.53	7.93
Reading, PA MSA	975	5.75	7.83	6.46	6.99	5.44	64.60	71.18	20.58	16.92	10.78	13.94	10.12	11.37	9.68
Scranton--Wilkes-Barre, PA MSA	1,105	6.52	2.97	1.36	8.56	8.33	70.02	69.23	18.45	21.09	8.32	3.93	8.91	8.74	8.86
York-Hanover, PA MSA	515	3.04	5.86	5.83	7.23	4.47	78.81	80.97	8.10	8.74	5.98	10.81	3.71	6.24	5.16

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Philadelphia, PA MD	64	38.32	1.56	0.00	5.23	0.00	35.78	26.56	57.36	73.44	12.62	0.00	0.00	5.38	29.59
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	16	9.58	0.24	0.00	5.09	12.50	81.33	68.75	13.33	18.75	7.02	0.00	6.67	5.88	15.38
Lancaster, PA MSA	23	13.77	0.56	0.00	2.77	4.35	92.55	95.65	4.11	0.00	1.07	0.00	1.33	1.07	0.00
Lebanon, PA MSA	3	1.80	0.00	0.00	1.48	0.00	81.89	0.00	16.64	100.00	1.61	0.00	0.00	0.00	33.33
Monroe-Wayne, PA Non-Metro	1	0.60	0.00	0.00	0.00	0.00	62.75	100.00	37.25	0.00	10.00	0.00	0.00	33.33	0.00
Northumberland-Schuylkill, PA Non-Metro	11	6.59	0.00	0.00	3.63	0.00	80.51	81.82	15.86	18.18	15.79	0.00	0.00	19.05	12.50
Reading, PA MSA	24	14.37	0.83	0.00	0.90	0.00	86.52	83.33	11.75	16.67	11.97	0.00	0.00	10.87	50.00
Scranton--Wilkes-Barre, PA MSA	16	9.58	0.29	0.00	3.85	0.00	70.19	68.75	25.67	31.25	30.00	0.00	0.00	41.18	25.00
York-Hanover, PA MSA	9	5.39	0.47	0.00	1.48	0.00	91.62	100.00	6.44	0.00	5.95	0.00	0.00	6.25	0.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	19,044	60.15	22.16	10.52	17.16	23.09	20.53	24.82	40.14	41.57	24.61	22.02	24.45	25.40	25.00
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	2,447	7.73	17.85	11.64	19.30	29.84	24.27	28.30	38.57	30.22	22.51	19.16	24.01	22.55	22.63
Lancaster, PA MSA	2,594	8.19	15.76	12.08	19.70	32.10	26.55	29.63	37.99	26.19	24.64	23.73	25.88	26.03	22.09
Lebanon, PA MSA	504	1.59	16.79	11.52	19.96	31.07	25.27	25.10	37.97	32.30	20.34	17.71	24.59	17.85	19.95
Monroe-Wayne, PA Non-Metro	930	2.94	14.35	2.86	15.81	14.44	21.38	28.52	48.46	54.18	22.95	19.67	22.97	25.83	21.56
Northumberland-Schuylkill, PA Non-Metro	583	1.84	18.03	11.01	20.28	29.78	24.77	27.44	36.92	31.77	20.13	17.39	19.73	20.00	21.46
Reading, PA MSA	1,856	5.86	17.73	10.26	19.00	30.54	24.38	27.52	38.90	31.68	24.24	23.42	23.71	24.55	24.85
Scranton--Wilkes-Barre, PA MSA	1,275	4.03	19.02	10.97	18.75	25.99	22.88	24.98	39.34	38.06	16.13	18.38	15.91	15.60	16.02
York-Hanover, PA MSA	2,429	7.67	15.97	11.17	19.58	29.54	27.05	28.60	37.40	30.70	23.01	20.89	20.72	24.43	25.18

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.7% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	1,458	62.66	22.16	11.11	17.16	17.27	20.53	24.63	40.14	46.99	11.29	7.53	9.58	11.92	13.54
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	158	6.79	17.85	12.34	19.30	23.38	24.27	29.87	38.57	34.42	6.24	6.91	6.07	6.50	5.89
Lancaster, PA MSA	180	7.74	15.76	6.78	19.70	24.86	26.55	34.46	37.99	33.90	10.03	6.38	10.71	12.75	8.36
Lebanon, PA MSA	46	1.98	16.79	10.87	19.96	17.39	25.27	36.96	37.97	34.78	9.25	6.25	13.04	9.38	8.47
Monroe-Wayne, PA Non-Metro	32	1.38	14.35	0.00	15.81	12.90	21.38	19.35	48.46	67.74	3.56	0.00	3.70	3.17	4.19
Northumberland-Schuylkill, PA Non-Metro	48	2.06	18.03	6.38	20.28	21.28	24.77	25.53	36.92	46.81	6.30	6.82	7.87	4.50	6.54
Reading, PA MSA	120	5.16	17.73	9.48	19.00	21.55	24.38	19.83	38.90	49.14	7.58	2.74	8.00	4.55	12.50
Scranton--Wilkes-Barre, PA MSA	140	6.02	19.02	9.42	18.75	21.74	22.88	18.84	39.34	50.00	4.09	2.38	4.98	2.93	5.10
York-Hanover, PA MSA	145	6.23	15.97	7.80	19.58	27.66	27.05	29.79	37.40	34.75	7.65	6.31	11.31	6.37	6.67

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.8% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: PENNSYLVANIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Philadelphia, PA MD	39,513	66.03	22.16	4.39	17.16	13.50	20.53	22.68	40.14	59.43	23.49	19.90	21.99	22.67	24.61
<b>Limited Review:</b>															
Harrisburg-Carlisle, PA MSA	4,031	6.74	17.85	6.57	19.30	20.05	24.27	26.81	38.57	46.56	16.39	15.34	15.61	15.47	17.59
Lancaster, PA MSA	4,437	7.42	15.76	5.96	19.70	20.19	26.55	31.39	37.99	42.45	23.62	25.86	22.90	24.34	23.10
Lebanon, PA MSA	788	1.32	16.79	6.12	19.96	21.19	25.27	30.01	37.97	42.67	15.50	16.77	15.78	15.18	15.36
Monroe-Wayne, PA Non-Metro	1,251	2.09	14.35	2.95	15.81	8.40	21.38	20.11	48.46	68.54	17.03	12.96	16.47	16.38	17.60
Northumberland-Schuylkill, PA Non-Metro	628	1.05	18.03	4.20	20.28	16.08	24.77	23.60	36.92	56.12	16.26	16.47	15.36	15.32	17.03
Reading, PA MSA	3,204	5.35	17.73	5.47	19.00	17.65	24.38	24.92	38.90	51.95	24.48	25.07	22.71	22.41	26.42
Scranton--Wilkes-Barre, PA MSA	2,302	3.85	19.02	4.70	18.75	13.02	22.88	24.87	39.34	57.42	17.58	14.63	14.56	17.68	18.71
York-Hanover, PA MSA	3,684	6.16	15.97	5.63	19.58	19.36	27.05	28.77	37.40	46.24	19.36	17.29	17.42	20.33	20.04

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 6.8% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES					Geography: PENNSYLVANIA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Philadelphia, PA MD	12,010	70.58	64.12	55.53	90.70	4.85	4.45	11.93	15.59	
<b>Limited Review:</b>										
Harrisburg-Carlisle, PA MSA	623	3.66	63.75	65.01	91.01	4.65	4.33	5.19	8.19	
Lancaster, PA MSA	883	5.19	66.75	57.98	91.28	4.87	3.85	6.35	8.99	
Lebanon, PA MSA	224	1.32	68.46	60.27	91.07	4.02	4.91	9.76	14.48	
Monroe-Wayne, PA Non-Metro	290	1.70	68.61	67.93	95.52	3.10	1.38	8.34	12.57	
Northumberland-Schuylkill, PA Non-Metro	391	2.30	66.67	63.43	96.68	1.79	1.53	9.70	14.11	
Reading, PA MSA	975	5.73	66.31	56.41	88.00	6.77	5.23	10.78	14.78	
Scranton--Wilkes-Barre, PA MSA	1,105	6.49	64.93	64.16	90.86	5.25	3.89	8.32	11.43	
York-Hanover, PA MSA	515	3.03	67.35	64.66	92.43	3.11	4.47	5.98	9.15	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 25.2% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Borrower Distribution: SMALL LOANS TO FARMS			Geography: PENNSYLVANIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Philadelphia, PA MD	64	38.32	95.60	82.81	93.75	4.69	1.56	12.62	14.41
<b>Limited Review:</b>									
Harrisburg-Carlisle, PA MSA	16	9.58	98.36	62.50	100.00	0.00	0.00	7.02	6.10
Lancaster, PA MSA	23	13.77	97.36	82.61	100.00	0.00	0.00	1.07	1.01
Lebanon, PA MSA	3	1.80	98.52	100.00	100.00	0.00	0.00	1.61	1.80
Monroe-Wayne, PA Non-Metro	1	0.60	97.86	100.00	100.00	0.00	0.00	10.00	50.00
Northumberland-Schuylkill, PA Non-Metro	11	6.59	96.53	72.73	100.00	0.00	0.00	15.79	16.28
Reading, PA MSA	24	14.37	97.21	58.33	83.33	8.33	8.33	11.97	9.09
Scranton--Wilkes-Barre, PA MSA	16	9.58	97.50	81.25	93.75	0.00	6.25	30.00	38.89
York-Hanover, PA MSA	9	5.39	97.79	88.89	100.00	0.00	0.00	5.95	6.45

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 6.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: PENNSYLVANIA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Philadelphia, PA MD	10	47,633	206	106,923	216	154,556	67.44	0	0
<b>Limited Review:</b>									
Harrisburg-Carlisle, PA MSA	1	3,711	26	21,175	27	24,887	10.86	0	0
Lancaster, PA MSA	0	0	13	574	13	574	0.25	0	0
Lebanon, PA MSA	0	0	1	4	1	4	0.00	0	0
Monroe-Wayne, PA Non-Metro	0	0	8	55	8	55	0.02	0	0
Northumberland-Schuylkill, PA Non-Metro	0	0	4	40	4	40	0.02	0	0
Reading, PA MSA	0	0	16	195	16	195	0.09	0	0
Scranton--Wilkes-Barre, PA MSA	3	16,471	27	14,747	30	31,217	13.62	0	0
York-Hanover, PA MSA	0	0	5	13,654	5	13,654	5.96	0	0
<b>Statewide:</b>									
Pennsylvania Statewide	1	2,905	4	1,088	5	3,994	1.74	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: PENNSYLVANIA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
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>																	
Philadelphia, PA MD	79.33	154	64.17	8.44	16.88	29.22	45.45	4	4	0	0	0	0	16.29	17.66	28.84	36.80
<b>Limited Review:</b>																	
Harrisburg-Carlisle, PA MSA	3.65	10	4.17	0.00	40.00	50.00	10.00	0	1	0	0	0	-1	4.57	19.81	50.67	24.32
Lancaster, PA MSA	3.14	16	6.67	6.25	6.25	75.00	12.50	0	1	0	-1	0	0	4.71	8.28	75.44	11.58
Lebanon, PA MSA	1.18	6	2.50	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.00	11.55	65.51	22.94
Monroe-Wayne, PA Non-Metro	0.78	4	1.67	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	2.01	59.35	38.64
Northumberland-Schuylkill, PA Non-	1.42	9	3.75	0.00	33.33	66.67	0.00	0	1	0	0	-1	0	0.00	18.36	72.39	9.25
Reading, PA MSA	5.18	18	7.50	16.67	5.56	61.11	16.67	1	1	0	0	0	0	14.95	6.51	53.63	24.92
Scranton--Wilkes-Barre, PA MSA	3.73	16	6.67	6.25	18.75	68.75	6.25	1	3	-2	0	0	0	2.16	18.36	58.38	21.09
York-Hanover, PA MSA	1.59	7	2.92	14.29	14.29	57.14	14.29	0	0	0	0	0	0	6.68	7.48	66.08	19.76

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: SOUTH CAROLINA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Charleston-North Charleston-Summerville, SC MSA	22.20	8,773	1,977,800	1,933	143,271	17	1,141	3	5,986	10,726	2,128,198	17.83
Columbia, SC MSA	19.11	7,665	1,253,006	1,544	99,647	23	1,526	2	1,500	9,234	1,355,679	36.41
Greenville-Mauldin-Easley, SC MSA	18.12	7,381	1,231,807	1,364	69,953	5	127	3	7,538	8,753	1,309,425	15.21
Limited Review:												
Anderson, SC MSA	4.24	1,770	256,114	275	17,798	5	353	0	0	2,050	274,264	2.77
Florence, SC MSA	3.57	1,348	192,782	368	23,002	8	355	1	1,100	1,725	217,239	5.26
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	7.72	3,222	512,809	504	31,950	2	32	0	0	3,728	544,791	4.14
Northeastern SC Non-Metro	3.78	1,450	273,673	370	18,024	7	585	0	0	1,827	292,282	3.77
Northwestern SC Non-Metro	2.68	1,011	129,623	275	15,920	8	507	0	0	1,294	146,050	2.94
Oconee County, SC Non-Metro	1.45	582	121,160	119	5,173	1	18	0	0	702	126,351	1.32
Southern SC Non-Metro	9.13	3,710	875,153	692	35,613	6	107	1	8,625	4,409	919,498	5.37
Spartanburg, SC MSA	6.31	2,534	368,422	513	39,115	2	170	0	0	3,049	407,707	3.49
Sumter, SC MSA	1.68	624	89,234	184	10,291	4	159	0	0	812	99,684	1.49

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston-North Charleston-Summerville, SC MSA	4,274	23.32	2.42	0.54	16.78	5.08	49.56	60.15	31.24	34.23	20.99	11.32	18.76	22.17	19.73
Columbia, SC MSA	3,167	17.28	0.96	0.38	23.50	11.05	42.68	34.86	32.86	53.71	19.79	16.13	17.23	19.02	20.96
Greenville-Mauldin-Easley, SC MSA	3,341	18.23	1.08	0.87	16.80	8.44	56.73	49.60	25.39	41.10	23.06	24.07	24.39	23.07	22.80
<b>Limited Review:</b>															
Anderson, SC MSA	815	4.45	0.00	0.00	13.81	7.12	68.46	62.33	17.73	30.55	23.43	0.00	26.45	23.04	23.65
Florence, SC MSA	605	3.30	2.33	0.33	20.03	5.45	55.83	46.45	21.81	47.77	22.19	50.00	15.86	21.35	24.54
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	1,680	9.17	0.00	0.00	9.72	4.17	72.14	76.43	18.13	19.40	19.45	0.00	16.55	18.92	22.73
Northeastern SC Non-Metro	571	3.12	0.00	0.00	20.08	6.83	63.25	31.00	16.67	62.17	14.40	0.00	18.30	13.80	14.30
Northwestern SC Non-Metro	387	2.11	0.00	0.00	4.36	2.07	78.08	60.98	17.56	36.95	15.46	0.00	18.52	14.24	17.76
Oconee County, SC Non-Metro	217	1.18	0.00	0.00	0.00	0.00	72.37	65.90	27.63	34.10	17.75	0.00	0.00	19.47	14.62
Southern SC Non-Metro	1,724	9.41	0.35	0.06	14.17	1.91	52.84	16.36	32.63	81.67	25.56	16.67	15.15	16.67	29.17
Spartanburg, SC MSA	1,231	6.72	1.89	0.73	12.54	6.90	69.00	68.81	16.57	23.56	24.18	42.86	24.76	24.56	22.73
Sumter, SC MSA	313	1.71	0.00	0.00	25.98	19.17	42.80	37.38	31.22	43.45	13.73	0.00	21.08	10.85	14.20

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston-North Charleston-Summerville, SC MSA	173	18.93	2.42	1.73	16.78	4.62	49.56	50.29	31.24	43.35	12.04	30.00	1.61	9.64	22.75
Columbia, SC MSA	201	21.99	0.96	1.99	23.50	13.43	42.68	34.33	32.86	50.25	20.00	50.00	15.15	17.73	23.50
Greenville-Mauldin-Easley, SC MSA	140	15.32	1.08	1.43	16.80	8.57	56.73	48.57	25.39	41.43	13.35	14.29	6.49	14.24	15.00
<b>Limited Review:</b>															
Anderson, SC MSA	56	6.13	0.00	0.00	13.81	8.93	68.46	71.43	17.73	19.64	17.80	0.00	18.75	18.06	16.13
Florence, SC MSA	51	5.58	2.33	1.96	20.03	19.61	55.83	47.06	21.81	31.37	11.22	0.00	11.11	11.57	10.53
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	46	5.03	0.00	0.00	9.72	13.04	72.14	67.39	18.13	19.57	10.43	0.00	5.00	9.49	18.18
Northeastern SC Non-Metro	44	4.81	0.00	0.00	20.08	18.18	63.25	56.82	16.67	25.00	11.16	0.00	6.67	12.80	11.11
Northwestern SC Non-Metro	52	5.69	0.00	0.00	4.36	0.00	78.08	67.31	17.56	32.69	21.43	0.00	0.00	19.13	34.38
Oconee County, SC Non-Metro	18	1.97	0.00	0.00	0.00	0.00	72.37	61.11	27.63	38.89	11.27	0.00	0.00	7.27	25.00
Southern SC Non-Metro	55	6.02	0.35	0.00	14.17	3.64	52.84	36.36	32.63	60.00	10.63	0.00	4.35	5.42	24.44
Spartanburg, SC MSA	53	5.80	1.89	1.89	12.54	11.32	69.00	56.60	16.57	30.19	16.67	25.00	26.67	13.77	21.95
Sumter, SC MSA	25	2.74	0.00	0.00	25.98	12.00	42.80	48.00	31.22	40.00	16.67	0.00	15.00	17.95	16.22

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: SOUTH CAROLINA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Charleston-North Charleston-Summerville, SC MSA	4,318	20.75	2.42	0.74	16.78	5.81	49.56	48.77	31.24	44.67	18.33	12.50	18.58	19.41	17.31	
Columbia, SC MSA	4,293	20.63	0.96	0.14	23.50	8.97	42.68	33.05	32.86	57.84	17.01	8.82	16.21	17.00	17.20	
Greenville-Mauldin-Easley, SC MSA	3,897	18.73	1.08	0.41	16.80	5.16	56.73	46.88	25.39	47.55	17.02	13.43	16.62	17.23	16.90	
Limited Review:																
Anderson, SC MSA	897	4.31	0.00	0.00	13.81	4.79	68.46	57.75	17.73	37.46	17.49	0.00	15.75	16.60	19.27	
Florence, SC MSA	690	3.32	2.33	0.14	20.03	9.86	55.83	43.04	21.81	46.96	17.00	0.00	17.32	15.64	18.51	
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	1,494	7.18	0.00	0.00	9.72	3.88	72.14	77.84	18.13	18.27	16.23	0.00	14.10	16.60	15.17	
Northeastern SC Non-Metro	835	4.01	0.00	0.00	20.08	7.90	63.25	27.78	16.67	64.31	14.53	0.00	13.85	12.32	15.92	
Northwestern SC Non-Metro	572	2.75	0.00	0.00	4.36	1.75	78.08	67.13	17.56	31.12	14.77	0.00	13.16	15.49	13.32	
Oconee County, SC Non-Metro	347	1.67	0.00	0.00	0.00	0.00	72.37	60.23	27.63	39.77	17.47	0.00	0.00	19.34	14.87	
Southern SC Non-Metro	1,931	9.28	0.35	0.05	14.17	2.38	52.84	22.37	32.63	75.19	18.81	0.00	8.88	15.70	20.48	
Spartanburg, SC MSA	1,249	6.00	1.89	0.24	12.54	6.33	69.00	62.13	16.57	31.31	17.34	6.67	22.03	16.29	18.80	
Sumter, SC MSA	286	1.37	0.00	0.00	25.98	16.78	42.80	36.01	31.22	47.20	12.05	0.00	15.38	10.70	12.36	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: SOUTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston-North Charleston-Summerville, SC MSA	8	40.00	8.85	12.50	16.36	0.00	46.36	50.00	28.43	37.50	4.76	0.00	0.00	8.33	0.00
Columbia, SC MSA	3	15.00	9.41	0.00	28.46	0.00	39.61	0.00	22.51	100.00	10.00	0.00	0.00	0.00	18.18
Greenville-Mauldin-Easley, SC MSA	3	15.00	2.90	0.00	26.00	33.33	44.53	0.00	26.57	66.67	6.67	0.00	0.00	0.00	25.00
Limited Review:															
Anderson, SC MSA	1	5.00	0.00	0.00	13.95	0.00	63.05	100.00	23.00	0.00	25.00	0.00	0.00	25.00	0.00
Florence, SC MSA	2	10.00	6.03	0.00	21.70	50.00	31.33	50.00	40.94	0.00	0.00	0.00	0.00	0.00	0.00
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	2	10.00	0.00	0.00	6.30	0.00	46.59	50.00	47.11	50.00	5.00	0.00	0.00	0.00	25.00
Northeastern SC Non-Metro	0	0.00	0.00	0.00	21.04	0.00	31.04	0.00	47.92	0.00	0.00	0.00	0.00	0.00	0.00
Northwestern SC Non-Metro	0	0.00	0.00	0.00	11.22	0.00	66.12	0.00	22.65	0.00	0.00	0.00	0.00	0.00	0.00
Oconee County, SC Non-Metro	0	0.00	0.00	0.00	0.00	0.00	55.11	0.00	44.89	0.00	0.00	0.00	0.00	0.00	0.00
Southern SC Non-Metro	0	0.00	1.44	0.00	6.24	0.00	20.92	0.00	71.41	0.00	0.00	0.00	0.00	0.00	0.00
Spartanburg, SC MSA	1	5.00	8.26	0.00	33.42	0.00	34.42	100.00	23.89	0.00	0.00	0.00	0.00	0.00	0.00
Sumter, SC MSA	0	0.00	0.00	0.00	51.20	0.00	13.10	0.00	35.71	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses* **	% BANK Loans****	% of Businesses* **	% BANK Loans	% of Businesses* **	% BANK Loans	% of Businesses* **	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston-North Charleston-Summerville, SC MSA	1,933	23.86	4.05	3.93	15.82	11.80	47.07	42.01	33.06	42.27	14.21	11.97	13.03	13.12	16.41
Columbia, SC MSA	1,510	18.64	3.50	3.97	22.29	18.28	35.98	31.59	35.59	46.16	11.91	11.54	10.76	11.20	13.16
Greenville-Mauldin-Easley, SC MSA	1,364	16.84	2.73	3.81	15.22	13.20	52.34	46.04	29.70	36.95	11.10	12.22	9.45	12.88	10.43
Limited Review:															
Anderson, SC MSA	268	3.31	0.00	0.00	12.85	11.94	63.10	57.46	22.58	30.60	11.33	0.00	9.18	10.73	11.86
Florence, SC MSA	368	4.54	3.35	3.26	22.78	14.67	49.13	48.64	24.74	33.42	15.74	20.93	21.97	14.70	14.45
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	504	6.22	0.00	0.00	13.80	13.10	64.84	61.71	21.36	25.20	8.01	0.00	9.93	7.28	9.46
Northeastern SC Non-Metro	370	4.57	0.00	0.00	19.91	17.03	49.98	36.76	30.10	46.22	12.64	0.00	21.04	11.83	11.37
Northwestern SC Non-Metro	275	3.40	0.00	0.00	5.81	9.09	73.41	74.18	20.78	16.73	13.86	0.00	28.89	14.86	10.14
Oconee County, SC Non-Metro	119	1.47	0.00	0.00	0.00	0.00	66.32	41.18	33.68	58.82	12.05	0.00	0.00	9.58	16.44
Southern SC Non-Metro	692	8.54	1.34	1.16	9.38	5.49	42.84	28.47	46.44	64.88	12.15	15.38	12.21	9.94	14.14
Spartanburg, SC MSA	513	6.33	4.76	5.07	13.59	17.74	60.91	49.12	20.74	28.07	11.32	25.95	11.72	10.09	12.91
Sumter, SC MSA	184	2.27	0.00	0.00	29.08	34.78	37.84	32.07	33.07	33.15	14.29	0.00	17.29	16.16	10.24

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: SOUTH CAROLINA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston-North Charleston-Summerville, SC MSA	17	19.32	2.03	0.00	16.85	0.00	51.56	52.94	29.56	47.06	27.08	0.00	0.00	42.86	58.33
Columbia, SC MSA	23	26.14	1.11	0.00	22.84	21.74	47.48	56.52	28.33	21.74	15.05	0.00	5.56	22.50	23.08
Greenville-Mauldin-Easley, SC MSA	5	5.68	1.42	0.00	11.17	0.00	66.42	60.00	21.00	40.00	16.67	0.00	0.00	12.50	33.33
Limited Review:															
Anderson, SC MSA	5	5.68	0.00	0.00	8.71	0.00	73.47	80.00	17.62	20.00	33.33	0.00	0.00	33.33	50.00
Florence, SC MSA	8	9.09	0.95	0.00	14.77	25.00	68.94	75.00	15.34	0.00	17.65	0.00	12.50	21.74	0.00
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	2	2.27	0.00	0.00	12.33	0.00	77.10	100.00	10.57	0.00	1.20	0.00	0.00	1.45	0.00
Northeastern SC Non-Metro	7	7.95	0.00	0.00	19.46	14.29	62.04	57.14	18.50	28.57	6.38	0.00	5.26	5.56	33.33
Northwestern SC Non-Metro	8	9.09	0.00	0.00	3.56	0.00	81.46	87.50	14.98	12.50	24.00	0.00	0.00	26.32	16.67
Oconee County, SC Non-Metro	1	1.14	0.00	0.00	0.00	0.00	78.60	100.00	21.40	0.00	12.50	0.00	0.00	14.29	0.00
Southern SC Non-Metro	6	6.82	0.22	0.00	13.93	0.00	56.29	100.00	29.55	0.00	3.26	0.00	0.00	6.12	0.00
Spartanburg, SC MSA	2	2.27	0.61	0.00	8.37	0.00	76.10	0.00	14.92	100.00	15.38	0.00	0.00	12.50	20.00
Sumter, SC MSA	4	4.55	0.00	0.00	26.84	25.00	54.55	75.00	18.61	0.00	16.67	0.00	25.00	15.38	0.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: SOUTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston-North Charleston-Summerville, SC MSA	4,274	23.32	21.35	8.40	17.45	23.63	21.13	26.01	40.08	41.96	21.19	19.86	21.35	21.81	20.99
Columbia, SC MSA	3,167	17.28	20.66	15.02	17.72	28.05	22.17	26.20	39.45	30.72	19.28	21.21	19.22	20.37	17.68
Greenville-Mauldin-Easley, SC MSA	3,341	18.23	19.99	11.34	18.25	26.03	22.03	25.06	39.72	37.57	22.88	20.85	22.72	23.71	23.09
<b>Limited Review:</b>															
Anderson, SC MSA	816	4.45	19.55	14.21	17.96	27.61	22.67	24.66	39.82	33.51	22.76	24.76	21.28	23.82	22.67
Florence, SC MSA	605	3.30	23.11	7.96	16.29	21.70	20.19	29.29	40.41	41.05	23.17	17.95	21.30	27.10	22.73
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	1,680	9.17	18.14	5.31	19.53	18.09	22.91	19.82	39.42	56.78	19.59	18.65	21.35	19.69	19.13
Northeastern SC Non-Metro	571	3.12	23.63	3.42	17.92	13.69	20.98	19.39	37.46	63.50	14.17	6.31	10.65	13.47	16.57
Northwestern SC Non-Metro	387	2.11	19.18	7.37	17.68	25.50	22.55	27.76	40.59	39.38	16.09	13.11	13.62	17.18	17.83
Oconee County, SC Non-Metro	217	1.18	15.40	6.22	16.74	16.27	22.77	22.01	45.10	55.50	18.61	34.62	16.30	16.67	19.06
Southern SC Non-Metro	1,724	9.41	20.49	0.85	15.58	7.45	19.00	15.57	44.94	76.13	26.71	10.77	20.68	24.14	28.70
Spartanburg, SC MSA	1,231	6.72	20.05	15.68	18.24	28.99	22.52	24.76	39.19	30.57	23.84	24.26	22.42	24.40	24.65
Sumter, SC MSA	313	1.71	21.04	3.96	17.91	18.35	21.47	32.73	39.59	44.96	16.38	16.22	14.74	15.45	17.68

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 7.9% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: SOUTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Charleston-North Charleston-Summerville, SC MSA	173	18.93	21.35	13.77	17.45	21.56	21.13	24.55	40.08	40.12	11.87	11.28	10.80	10.63	13.77
Columbia, SC MSA	201	21.99	20.66	11.17	17.72	22.34	22.17	27.41	39.45	39.09	20.59	19.67	23.15	23.39	17.92
Greenville-Mauldin-Easley, SC MSA	140	15.32	19.99	10.79	18.25	17.99	22.03	19.42	39.72	51.80	13.83	6.67	14.85	15.53	15.57
Limited Review:															
Anderson, SC MSA	56	6.13	19.55	19.61	17.96	23.53	22.67	31.37	39.82	25.49	15.93	19.57	15.91	14.89	13.33
Florence, SC MSA	51	5.58	23.11	6.12	16.29	28.57	20.19	36.73	40.41	28.57	11.79	0.00	16.67	13.56	12.73
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	46	5.03	18.14	13.33	19.53	22.22	22.91	17.78	39.42	46.67	10.55	14.29	6.67	9.30	12.05
Northeastern SC Non-Metro	44	4.81	23.63	13.64	17.92	20.45	20.98	34.09	37.46	31.82	11.71	23.08	7.55	19.23	5.41
Northwestern SC Non-Metro	52	5.69	19.18	7.84	17.68	25.49	22.55	27.45	40.59	39.22	22.07	15.38	30.00	17.07	25.00
Oconee County, SC Non-Metro	18	1.97	15.40	11.11	16.74	11.11	22.77	33.33	45.10	44.44	11.59	15.38	0.00	25.00	4.76
Southern SC Non-Metro	55	6.02	20.49	5.56	15.58	11.11	19.00	18.52	44.94	64.81	11.00	2.50	5.88	9.64	16.67
Spartanburg, SC MSA	53	5.80	20.05	19.61	18.24	19.61	22.52	25.49	39.19	35.29	15.98	17.50	11.11	15.56	18.75
Sumter, SC MSA	25	2.74	21.04	25.00	17.91	20.83	21.47	20.83	39.59	33.33	16.48	40.00	20.00	7.41	15.38

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.6% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: SOUTH CAROLINA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Charleston-North Charleston-Summerville, SC MSA	4,318	20.75	21.35	3.79	17.45	14.24	21.13	22.62	40.08	59.35	18.02	12.95	18.00	18.64	18.24
Columbia, SC MSA	4,294	20.63	20.66	6.12	17.72	18.87	22.17	25.46	39.45	49.55	16.69	14.81	17.81	17.82	16.01
Greenville-Mauldin-Easley, SC MSA	3,897	18.73	19.99	5.25	18.25	15.02	22.03	23.04	39.72	56.69	18.07	17.61	16.82	18.86	18.16
<b>Limited Review:</b>															
Anderson, SC MSA	897	4.31	19.55	5.30	17.96	15.28	22.67	27.02	39.82	52.40	18.21	17.39	18.18	19.34	17.75
Florence, SC MSA	690	3.32	23.11	4.87	16.29	14.62	20.19	25.55	40.41	54.96	17.74	15.56	18.49	21.41	16.38
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	1,494	7.18	18.14	3.61	19.53	13.37	22.91	25.21	39.42	57.80	16.81	10.49	15.65	18.74	17.18
Northeastern SC Non-Metro	835	4.01	23.63	2.07	17.92	11.16	20.98	20.39	37.46	66.39	14.99	9.01	13.74	13.59	16.14
Northwestern SC Non-Metro	572	2.75	19.18	4.02	17.68	18.71	22.55	24.35	40.59	52.92	15.01	12.64	18.15	16.32	13.90
Oconee County, SC Non-Metro	347	1.67	15.40	0.90	16.74	8.43	22.77	15.06	45.10	75.60	19.30	8.00	21.33	14.18	20.51
Southern SC Non-Metro	1,931	9.28	20.49	1.24	15.58	5.33	19.00	12.69	44.94	80.74	19.97	8.41	13.77	19.50	20.99
Spartanburg, SC MSA	1,249	6.00	20.05	6.81	18.24	17.70	22.52	23.68	39.19	51.81	18.24	17.27	16.15	15.94	20.34
Sumter, SC MSA	286	1.37	21.04	2.78	17.91	14.44	21.47	26.11	39.59	56.67	10.94	2.70	11.40	13.18	10.46

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 15.8% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Charleston-North Charleston-Summerville, SC MSA	1,933	23.74	67.09	52.66	86.29	5.74	7.97	14.21	17.24	
Columbia, SC MSA	1,544	18.97	67.30	56.74	89.31	4.86	5.83	11.91	15.06	
Greenville-Mauldin-Easley, SC MSA	1,364	16.75	65.73	59.75	92.38	2.71	4.91	11.10	15.49	
<b>Limited Review:</b>										
Anderson, SC MSA	275	3.38	66.28	49.82	87.27	7.27	5.45	11.33	13.39	
Florence, SC MSA	368	4.52	68.23	48.64	89.40	5.43	5.16	15.74	17.02	
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	504	6.19	68.74	62.70	89.68	3.97	6.35	8.01	8.65	
Northeastern SC Non-Metro	370	4.54	68.43	53.24	89.46	7.30	3.24	12.64	15.76	
Northwestern SC Non-Metro	275	3.38	67.00	60.36	92.00	2.18	5.82	13.86	20.51	
Oconee County, SC Non-Metro	119	1.46	68.00	59.66	93.28	4.20	2.52	12.05	15.88	
Southern SC Non-Metro	692	8.50	69.02	61.42	91.47	5.06	3.47	12.15	15.17	
Spartanburg, SC MSA	513	6.30	63.79	46.20	86.35	6.63	7.02	11.32	13.91	
Sumter, SC MSA	184	2.26	68.28	48.91	88.59	8.15	3.26	14.29	14.75	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 27.9% 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: SOUTH CAROLINA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Charleston-North Charleston-Summerville, SC MSA	17	19.32	95.87	76.47	88.24	0.00	11.76	27.08	32.43
Columbia, SC MSA	23	26.14	97.48	65.22	86.96	8.70	4.35	15.05	13.64
Greenville-Mauldin-Easley, SC MSA	5	5.68	97.67	100.00	100.00	0.00	0.00	16.67	25.00
<b>Limited Review:</b>									
Anderson, SC MSA	5	5.68	98.22	80.00	80.00	0.00	20.00	33.33	40.00
Florence, SC MSA	8	9.09	98.67	75.00	87.50	12.50	0.00	17.65	21.74
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	2	2.27	98.37	100.00	100.00	0.00	0.00	1.20	1.33
Northeastern SC Non-Metro	7	7.95	97.14	71.43	71.43	28.57	0.00	6.38	7.35
Northwestern SC Non-Metro	8	9.09	98.50	62.50	87.50	0.00	12.50	24.00	22.22
Oconee County, SC Non-Metro	1	1.14	98.14	100.00	100.00	0.00	0.00	12.50	20.00
Southern SC Non-Metro	6	6.82	95.84	100.00	100.00	0.00	0.00	3.26	4.23
Spartanburg, SC MSA	2	2.27	97.72	0.00	100.00	0.00	0.00	15.38	25.00
Sumter, SC MSA	4	4.55	97.84	75.00	100.00	0.00	0.00	16.67	14.29

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 18.2% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: SOUTH CAROLINA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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-North Charleston-Summerville, SC MSA	4	3,313	57	5,148	61	8,461	10.45	0	0
Columbia, SC MSA	4	6,116	52	9,828	56	15,944	19.68	0	0
Greenville-Mauldin-Easley, SC MSA	8	17,843	34	2,876	42	20,719	25.58	0	0
<b>Limited Review:</b>									
Anderson, SC MSA	2	801	3	12	5	813	1.00	0	0
Florence, SC MSA	1	649	7	131	8	780	0.96	0	0
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	2	569	5	24	7	593	0.73	0	0
Northeastern SC Non-Metro	4	3,278	4	6,608	8	9,886	12.21	0	0
Northwestern SC Non-Metro	2	202	1	1	3	203	0.25	0	0
Oconee County, SC Non-Metro	0	0	1	5	1	5	0.01	0	0
Southern SC Non-Metro	0	0	6	4,681	6	4,681	5.78	0	0
Spartanburg, SC MSA	3	3,713	6	15,138	9	18,851	23.28	0	0
Sumter, SC MSA	0	0	3	13	3	13	0.02	0	0
<b>Statewide:</b>									
South Carolina Statewide	0	0	1	47	1	47	0.06	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: SOUTH CAROLINA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Charleston-North Charleston-Summerville, SC MSA	17.83	24	18.32	8.33	16.67	45.83	29.17	0	0	0	0	0	0	3.98	22.83	46.90	26.29
Columbia, SC MSA	36.41	27	20.61	0.00	22.22	33.33	44.44	0	0	0	0	0	0	3.58	27.81	36.13	30.18
Greenville-Mauldin-Easley, SC MSA	15.21	24	18.32	8.33	16.67	25.00	50.00	0	0	0	0	0	0	4.90	21.20	44.76	29.13
Limited Review:																	
Anderson, SC MSA	2.77	5	3.82	0.00	40.00	60.00	0.00	0	0	0	0	0	0	4.05	20.64	46.06	29.25
Florence, SC MSA	5.26	8	6.11	0.00	25.00	37.50	37.50	0	0	0	0	0	0	1.47	17.70	56.12	24.71
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	4.14	8	6.11	0.00	12.50	37.50	50.00	0	0	0	0	0	0	2.37	16.50	58.10	23.01
Northeastern SC Non-Metro	3.77	9	6.87	0.00	33.33	33.33	33.33	0	0	0	0	0	0	2.94	32.94	46.18	17.94
Northwestern SC Non-Metro	2.94	5	3.82	20.00	0.00	40.00	40.00	0	2	0	0	-2	0	3.65	8.05	65.07	23.23
Oconee County, SC Non-Metro	1.32	2	1.53	0.00	0.00	50.00	50.00	0	0	0	0	0	0	0.00	0.00	66.30	33.70
Southern SC Non-Metro	5.37	8	6.11	0.00	12.50	25.00	62.50	0	0	0	0	0	0	1.02	21.73	40.80	36.45
Spartanburg, SC MSA	3.49	8	6.11	0.00	25.00	37.50	37.50	0	0	0	0	0	0	4.27	22.00	49.39	24.34
Sumter, SC MSA	1.49	3	2.29	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	30.64	41.72	27.63

**Table 1. Lending Volume**

LENDING VOLUME												Geography: SOUTH DAKOTA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011	
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full Review:															
Greater SD Non-Metro	29.40	5,802	782,796	4,154	272,650	3,884	564,178	6	4,350	13,846	1,623,974	1.61			
Sioux Falls, SD MSA	37.10	10,978	1,808,783	5,836	369,663	650	72,968	11	7,590	17,475	2,259,004	97.04			
Limited Review:															
Fall River County, SD Non-Metro	1.20	220	28,353	310	11,396	33	3,283	0	0	563	43,032	0.07			
Mitchell, SD Non-Metro	3.55	821	106,267	622	30,825	226	34,199	2	1,820	1,671	173,111	0.19			
Rapid City, SD MSA	18.42	5,568	927,133	2,851	190,239	249	16,396	8	2,672	8,676	1,136,440	0.70			
Western SD Non-Metro	7.01	1,730	272,306	1,347	55,159	227	12,257	0	0	3,304	339,722	0.27			
Yankton-Vermillion, SD Non-Metro	3.32	835	114,102	470	23,348	260	28,599	0	0	1,565	166,050	0.12			

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: SOUTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater SD Non-Metro	1,903	22.59	1.34	0.42	6.44	2.94	63.44	53.13	28.78	43.51	17.19	50.00	22.22	18.66	15.22
Sioux Falls, SD MSA	3,461	41.09	0.00	0.00	13.26	5.87	69.94	72.84	16.80	21.29	18.22	0.00	15.79	17.90	20.41
<b>Limited Review:</b>															
Fall River County, SD Non-Metro	77	0.91	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.24	0.00	0.00	13.24	0.00
Mitchell, SD Non-Metro	235	2.79	0.00	0.00	0.00	0.00	80.37	68.51	19.63	31.49	18.89	0.00	0.00	15.76	25.58
Rapid City, SD MSA	1,908	22.65	0.00	0.00	19.41	15.09	53.94	57.86	26.65	27.04	21.59	0.00	16.81	21.86	23.84
Western SD Non-Metro	578	6.86	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	31.35	0.00	0.00	31.35	0.00
Yankton-Vermillion, SD Non-Metro	261	3.10	0.00	0.00	0.00	0.00	81.46	82.38	18.54	17.62	12.34	0.00	0.00	11.67	14.61

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: SOUTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
<b>Full Review:</b>																
Greater SD Non-Metro	331	32.17	1.34	0.91	6.44	4.23	63.44	55.59	28.78	39.27	16.96	0.00	50.00	19.12	12.29	
Sioux Falls, SD MSA	366	35.57	0.00	0.00	13.26	4.64	69.94	70.22	16.80	25.14	17.42	0.00	12.24	16.71	22.92	
<b>Limited Review:</b>																
Fall River County, SD Non-Metro	12	1.17	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.09	0.00	0.00	9.09	0.00	
Mitchell, SD Non-Metro	34	3.30	0.00	0.00	0.00	0.00	80.37	76.47	19.63	23.53	11.76	0.00	0.00	13.95	0.00	
Rapid City, SD MSA	176	17.10	0.00	0.00	19.41	14.20	53.94	48.30	26.65	37.50	15.63	0.00	21.88	13.28	17.19	
Western SD Non-Metro	78	7.58	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	25.35	0.00	0.00	25.35	0.00	
Yankton-Vermillion, SD Non-Metro	32	3.11	0.00	0.00	0.00	0.00	81.46	84.38	18.54	15.63	14.89	0.00	0.00	15.00	14.29	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: SOUTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Greater SD Non-Metro	3,557	21.62	1.34	0.17	6.44	1.69	63.44	51.31	28.78	46.84	22.47	33.33	26.00	21.98	22.81
Sioux Falls, SD MSA	7,128	43.33	0.00	0.00	13.26	3.68	69.94	70.96	16.80	25.36	23.03	0.00	18.73	22.49	25.96
Limited Review:															
Fall River County, SD Non-Metro	131	0.80	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.71	0.00	0.00	33.71	0.00
Mitchell, SD Non-Metro	549	3.34	0.00	0.00	0.00	0.00	80.37	66.85	19.63	33.15	27.66	0.00	0.00	25.24	34.21
Rapid City, SD MSA	3,476	21.13	0.00	0.00	19.41	10.47	53.94	50.43	26.65	39.10	27.24	0.00	19.60	26.10	31.43
Western SD Non-Metro	1,067	6.49	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	41.82	0.00	0.00	41.82	0.00
Yankton-Vermillion, SD Non-Metro	541	3.29	0.00	0.00	0.00	0.00	81.46	81.33	18.54	18.67	26.14	0.00	0.00	24.71	32.32

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: SOUTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater SD Non-Metro	11	20.75	0.85	0.00	6.66	0.00	49.36	54.55	43.13	45.45	6.98	0.00	0.00	0.00	12.50
Sioux Falls, SD MSA	23	43.40	0.00	0.00	32.79	13.04	59.58	82.61	7.63	4.35	14.00	0.00	28.57	10.81	16.67
<b>Limited Review:</b>															
Fall River County, SD Non-Metro	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
Mitchell, SD Non-Metro	3	5.66	0.00	0.00	0.00	0.00	49.80	33.33	50.20	66.67	33.33	0.00	0.00	0.00	33.33
Rapid City, SD MSA	8	15.09	0.00	0.00	42.91	12.50	30.94	25.00	26.14	62.50	8.33	0.00	20.00	0.00	0.00
Western SD Non-Metro	7	13.21	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	33.33	0.00	0.00	33.33	0.00
Yankton-Vermillion, SD Non-Metro	1	1.89	0.00	0.00	0.00	0.00	83.64	100.00	16.36	0.00	10.00	0.00	0.00	12.50	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: SOUTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Greater SD Non-Metro	4,154	26.65	1.78	0.19	7.09	6.45	63.92	62.11	27.22	31.25	30.18	68.18	37.82	31.59	28.63
Sioux Falls, SD MSA	5,836	37.43	0.00	0.00	17.12	18.37	72.06	69.45	10.82	12.18	32.50	0.00	33.67	32.36	40.20
<b>Limited Review:</b>															
Fall River County, SD Non-Metro	310	1.99	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	46.80	0.00	0.00	48.97	0.00
Mitchell, SD Non-Metro	622	3.99	0.00	0.00	0.00	0.00	79.50	76.05	20.50	23.95	44.04	0.00	0.00	40.77	57.61
Rapid City, SD MSA	2,851	18.29	0.00	0.00	30.79	21.64	48.74	56.26	20.47	22.10	27.37	0.00	27.33	29.73	25.84
Western SD Non-Metro	1,347	8.64	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	44.53	0.00	0.00	46.72	0.00
Yankton-Vermillion, SD Non-Metro	470	3.01	0.00	0.00	0.00	0.00	88.76	83.40	11.24	16.60	31.52	0.00	0.00	32.00	36.21

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: SOUTH DAKOTA								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Greater SD Non-Metro	3,884	70.25	1.12	0.85	5.18	9.68	79.03	75.05	14.68	14.42	30.41	4.17	18.45	32.88	43.18	
Sioux Falls, SD MSA	650	11.76	0.00	0.00	17.98	19.38	76.82	76.92	5.20	3.69	19.53	0.00	26.83	18.29	26.32	
Limited Review:																
Fall River County, SD Non-Metro	33	0.60	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	9.21	0.00	0.00	9.21	0.00	
Mitchell, SD Non-Metro	226	4.09	0.00	0.00	0.00	0.00	92.86	80.09	7.14	19.91	29.34	0.00	0.00	26.35	52.63	
Rapid City, SD MSA	249	4.50	0.00	0.00	33.86	49.80	53.57	46.59	12.57	3.61	13.97	0.00	17.00	10.95	40.00	
Western SD Non-Metro	227	4.11	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	30.22	0.00	0.00	30.73	0.00	
Yankton-Vermillion, SD Non-Metro	260	4.70	0.00	0.00	0.00	0.00	91.18	94.62	8.82	5.38	37.93	0.00	0.00	38.57	20.00	

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: SOUTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater SD Non-Metro	1,903	22.59	18.77	5.10	16.84	21.56	23.51	27.21	40.89	46.13	17.85	17.21	17.22	16.07	19.59
Sioux Falls, SD MSA	3,461	41.09	15.28	12.54	19.59	28.96	28.64	27.39	36.48	31.11	18.38	20.67	17.59	17.55	18.88
<b>Limited Review:</b>															
Fall River County, SD Non-Metro	77	0.91	18.42	7.79	21.61	19.48	22.73	24.68	37.24	48.05	14.75	0.00	11.76	18.18	17.24
Mitchell, SD Non-Metro	235	2.79	15.93	3.08	16.07	22.03	23.27	29.52	44.73	45.37	19.01	8.33	17.14	20.00	22.73
Rapid City, SD MSA	1,908	22.65	17.62	4.74	18.58	23.81	25.85	29.85	37.94	41.59	23.86	18.75	23.06	22.55	25.96
Western SD Non-Metro	578	6.86	19.24	4.12	19.40	17.74	24.02	28.14	37.35	50.00	33.73	20.00	38.24	24.42	37.87
Yankton-Vermillion, SD Non-Metro	261	3.10	16.46	4.42	16.96	16.87	23.23	24.90	43.34	53.82	13.47	9.38	14.29	7.78	17.61

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 6.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: SOUTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater SD Non-Metro	331	32.17	18.77	4.36	16.84	14.33	23.51	22.12	40.89	59.19	17.98	12.00	10.00	19.15	22.02
Sioux Falls, SD MSA	366	35.57	15.28	7.04	19.59	21.41	28.64	30.79	36.48	40.76	16.87	13.21	17.60	17.02	17.30
<b>Limited Review:</b>															
Fall River County, SD Non-Metro	12	1.17	18.42	0.00	21.61	25.00	22.73	33.33	37.24	41.67	9.09	0.00	50.00	0.00	0.00
Mitchell, SD Non-Metro	34	3.30	15.93	0.00	16.07	15.63	23.27	28.13	44.73	56.25	12.24	0.00	16.67	6.25	19.05
Rapid City, SD MSA	176	17.10	17.62	2.94	18.58	17.06	25.85	25.88	37.94	54.12	15.17	0.00	21.05	15.63	14.43
Western SD Non-Metro	78	7.58	19.24	6.49	19.40	14.29	24.02	27.27	37.35	51.95	27.42	66.67	33.33	33.33	18.75
Yankton-Vermillion, SD Non-Metro	32	3.11	16.46	3.33	16.96	6.67	23.23	30.00	43.34	60.00	15.00	14.29	0.00	6.67	36.36

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.5% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: SOUTH DAKOTA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Greater SD Non-Metro	3,557	21.62	18.77	2.37	16.84	9.68	23.51	20.31	40.89	67.64	24.70	14.29	16.76	20.36	28.83
Sioux Falls, SD MSA	7,128	43.33	15.28	4.83	19.59	16.15	28.64	26.93	36.48	52.09	24.35	19.69	20.20	23.44	27.30
<b>Limited Review:</b>															
Fall River County, SD Non-Metro	131	0.80	18.42	4.31	21.61	11.21	22.73	25.86	37.24	58.62	36.49	42.86	25.00	29.41	42.11
Mitchell, SD Non-Metro	549	3.34	15.93	2.70	16.07	11.20	23.27	17.57	44.73	68.53	32.17	20.00	25.00	32.61	34.95
Rapid City, SD MSA	3,476	21.13	17.62	3.36	18.58	12.77	25.85	26.00	37.94	57.87	28.16	23.23	22.08	25.65	31.13
Western SD Non-Metro	1,067	6.49	19.24	3.38	19.40	12.64	24.02	22.49	37.35	61.49	45.75	44.44	48.61	41.18	46.63
Yankton-Vermillion, SD Non-Metro	541	3.29	16.46	2.56	16.96	13.19	23.23	20.67	43.34	63.58	30.71	21.43	30.36	28.40	31.97

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 11.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Table 11: Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: SOUTH DAKOTA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Greater SD Non-Metro	4,154	26.65	67.81	68.25	88.59	5.66	5.75	30.18	39.83
Sioux Falls, SD MSA	5,836	37.43	67.49	68.83	89.56	4.69	5.74	32.50	43.82
Limited Review:									
Fall River County, SD Non-Metro	310	1.99	68.19	68.39	93.87	2.58	3.55	46.80	53.72
Mitchell, SD Non-Metro	622	3.99	69.86	74.76	91.80	4.34	3.86	44.04	55.80
Rapid City, SD MSA	2,851	18.29	68.04	70.15	88.81	5.26	5.93	27.37	37.34
Western SD Non-Metro	1,347	8.64	74.02	78.54	92.87	4.16	2.97	44.53	53.03
Yankton-Vermillion, SD Non-Metro	470	3.01	70.53	74.89	92.77	3.83	3.40	31.52	47.27

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.1% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: SOUTH DAKOTA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*			
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less		
Full Review:											
Greater SD Non-Metro	3,884	70.25	98.28	63.18	54.71	27.27	18.02	30.41	24.87		
Sioux Falls, SD MSA	650	11.76	98.83	66.15	66.46	19.69	13.85	19.53	16.67		
Limited Review:											
Fall River County, SD Non-Metro	33	0.60	98.82	54.55	66.67	30.30	3.03	9.21	5.88		
Mitchell, SD Non-Metro	226	4.09	97.71	68.14	53.10	26.11	20.80	29.34	27.91		
Rapid City, SD MSA	249	4.50	99.29	59.84	81.93	16.47	1.61	13.97	10.40		
Western SD Non-Metro	227	4.11	98.93	76.65	87.22	9.69	3.08	30.22	30.26		
Yankton-Vermillion, SD Non-Metro	260	4.70	99.14	61.15	65.77	25.38	8.85	37.93	38.55		

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 22.3% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: SOUTH DAKOTA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Greater SD Non-Metro	5	2,054	25	8,424	30	10,478	48.69	0	0
Sioux Falls, SD MSA	4	1,582	45	6,229	49	7,811	36.30	0	0
<b>Limited Review:</b>									
Fall River County, SD Non-Metro	0	0	0	0	0	0	0.00	0	0
Mitchell, SD Non-Metro	0	0	4	24	4	24	0.11	0	0
Rapid City, SD MSA	1	540	8	81	9	621	2.88	0	0
Western SD Non-Metro	1	250	2	260	3	510	2.37	0	0
Yankton-Vermillion, SD Non-Metro	2	887	4	40	6	927	4.31	0	0
<b>Statewide:</b>									
South Dakota Statewide	3	1,125	1	25	4	1,150	5.34	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: SOUTH DAKOTA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
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>																	
Greater SD Non-Metro	1.61	18	38.30	0.00	11.11	88.89	0.00	0	3	0	-1	-2	0	2.95	7.44	78.57	11.04
Sioux Falls, SD MSA	97.04	14	29.79	0.00	42.86	42.86	14.29	0	1	0	0	-1	0	0.00	24.46	53.95	21.60
<b>Limited Review:</b>																	
Fall River County, SD Non-Metro	0.07	1	2.13	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Mitchell, SD Non-Metro	0.19	1	2.13	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	76.06	23.94
Rapid City, SD MSA	0.70	6	12.77	0.00	33.33	66.67	0.00	0	0	0	0	0	0	0.59	22.25	57.25	19.91
Western SD Non-Metro	0.27	4	8.51	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	8.69	91.31	0.00
Yankton-Vermillion, SD Non-Metro	0.12	3	6.38	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	0.00	90.46	9.54

**Table 1. Lending Volume**

LENDING VOLUME				Geography: TENNESSEE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	100.00	19,641	3,728,947	1,374	65,878	9	200	6	34,708	21,030	3,829,732	100.00

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: TENNESSEE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	8,071	100.00	1.59	1.19	17.54	9.35	57.52	60.12	23.35	29.34	17.92	20.00	17.02	18.38	17.25

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geography: TENNESSEE															Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*								
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp				
Full Review:																			
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	295	100.00	1.59	1.02	17.54	9.83	57.52	54.92	23.35	34.24	10.29	3.85	4.52	10.43	16.16				

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Table 4: Geographic Distribution of Home Mortgage Refinance Loans															
Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	11,270	100.00	1.59	0.64	17.54	7.52	57.52	58.22	23.35	33.62	16.18	13.18	14.04	16.82	15.74

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	5	100.00	7.79	0.00	24.68	40.00	51.09	60.00	16.43	0.00	5.77	0.00	10.53	4.17	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses			Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Businesses* **	% BANK Loans****	% of Businesses* **	% BANK Loans	% of Businesses* **	% BANK Loans	% of Businesses* **	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro-	1,367	100.00	2.97	5.05	20.01	17.34	50.57	41.40	26.23	36.21	3.31	5.74	3.35	2.95	3.72

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	9	100.00	0.96	0.00	18.25	22.22	62.06	44.44	18.59	33.33	2.02	0.00	1.30	1.18	14.29

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	8,071	100.00	19.23	12.36	18.34	24.82	23.56	23.70	38.86	39.12	17.72	14.37	16.54	18.79	19.25

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 8.5% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	295	100.00	19.23	9.54	18.34	22.61	23.56	25.44	38.86	42.40	10.27	5.45	8.81	11.81	12.67

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: TENNESSEE						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	11,270	100.00	19.23	6.33	18.34	18.41	23.56	25.13	38.86	50.13	16.36	13.45	15.47	17.06	16.85

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 15.6% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: TENNESSEE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	1,374	100.00	68.07	68.70	93.23	3.86	2.91	3.31	5.42

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 14.0% 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: TENNESSEE				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	9	100.00	98.10	77.78	100.00	0.00	0.00	2.02	2.01

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: TENNESSEE		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Nashville-Davidson--Murfreesboro-Franklin, TN MSA	1	189	34	5,979	35	6,167	98.40	0	0
<b>Statewide:</b>									
Tennessee Statewide	0	0	1	100	1	100	1.60	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS				Geography: TENNESSEE				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012									
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Nashville-Davidson—Murfreesboro— Franklin, TN MSA	100.00	11	100.00	0.00	9.09	18.18	72.73	0	0	0	0	0	0	7.06	22.36	41.27	29.00

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: TEXAS												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Austin-Round Rock-San Marcos, TX MSA	13.23	59,972	12,239,595	30,180	1,112,648	291	6,779	27	137,648	90,470	13,496,669	10.84
Dallas-Plano-Irving, TX MD	20.68	109,452	20,638,248	31,686	1,260,401	214	6,890	28	135,855	141,380	22,041,393	19.18
El Paso, TX MSA	2.76	9,843	1,412,408	8,979	321,402	55	1,053	9	6,443	18,886	1,741,306	3.71
Fort Worth-Arlington, TX MD	11.03	52,356	8,614,375	22,738	829,916	264	6,548	23	59,503	75,381	9,510,342	9.12
Houston-Sugar Land-Baytown, TX MSA	27.98	124,722	22,907,505	66,001	2,754,999	642	27,344	36	202,410	191,401	25,892,257	32.59
Limited Review:												
Amarillo, TX MSA	0.71	2,544	384,803	2,128	109,329	159	11,032	0	0	4,831	505,163	0.59
Atlanta, TX Non-Metro	0.03	128	14,087	49	3,359	4	59	0	0	181	17,505	0.05
Beaumont-Port Arthur, TX MSA	1.02	4,090	576,695	2,814	201,504	37	2,699	2	17,950	6,943	798,848	1.23
Big Spring, TX Non-Metro	0.07	181	17,605	228	9,299	49	7,053	0	0	458	33,958	0.22
Borger, TX Non-Metro	0.05	172	18,041	172	9,359	0	0	0	0	344	27,400	0.06
Brazos Valley,TX Non-Metro	0.32	1,090	162,768	977	28,220	112	4,179	0	0	2,179	195,168	0.48
Brownsville-Harlingen, TX MSA	0.95	3,461	412,797	2,931	96,517	75	2,641	0	0	6,467	511,955	1.66
Central TX Non-Metro	0.35	1,459	314,785	910	29,238	23	413	0	0	2,392	344,437	0.17
College Station-Bryan, TX MSA	0.94	4,549	718,487	1,834	77,491	73	2,230	3	411	6,459	798,619	1.18
Corpus Christi, TX MSA	1.23	5,297	797,893	2,983	120,557	113	7,098	0	0	8,393	925,548	1.25
Garza County, TX Non-Metro	0.03	63	5,328	119	3,146	48	6,443	0	0	230	14,917	0.15
Hartley County, TX Non-Metro	0.02	47	6,241	25	393	31	4,997	0	0	103	11,631	0.02
Hill County, TX Non-Metro	0.12	396	48,534	341	14,738	76	5,539	0	0	813	68,810	0.11
Kerrville, TX Non-Metro	0.39	1,031	184,857	1,607	72,445	42	1,621	0	0	2,680	258,922	0.54
Killeen-Temple-Fort Hood, TX MSA	1.57	10,020	1,430,797	662	26,774	30	2,978	0	0	10,712	1,460,549	0.23
Laredo, TX MSA	0.55	2,262	296,188	1,459	42,144	7	72	1	1,133	3,729	339,536	0.55
Lubbock, TX MSA	1.38	7,125	939,123	2,182	81,222	137	7,621	0	0	9,444	1,027,966	1.01
McAllen-Edinburg-Mission, TX MSA	1.08	4,665	580,410	2,682	81,921	19	715	0	0	7,366	663,046	0.71
Midland, TX MSA	0.65	2,618	433,424	1,779	107,110	29	2,434	7	1,225	4,433	544,193	2.01
Montague County, TX Non-Metro	0.06	221	26,526	198	3,495	14	337	0	0	433	30,358	0.10
Odessa, TX MSA	0.34	1,830	242,552	508	24,917	5	70	0	0	2,343	267,539	0.39
Plainview, TX Non-Metro	0.13	406	36,121	321	9,024	159	19,575	0	0	886	64,719	0.26
San Angelo, TX MSA	0.49	2,248	285,625	1,056	43,959	42	2,171	1	7,067	3,347	338,822	0.94
San Antonio-New Braunfels, TX MSA	9.07	44,554	7,826,025	16,947	695,923	493	23,227	19	67,635	62,013	8,612,810	6.12
South TX Non-Metro	0.22	597	65,981	865	33,576	49	5,132	2	2,112	1,513	106,801	0.66
Southeastern TX Non-Metro	0.62	1,389	187,695	2,086	78,259	749	34,491	1	1,829	4,225	302,274	0.95
Victoria, TX MSA	0.57	1,923	257,197	1,898	139,252	97	5,194	4	1,500	3,922	403,142	1.14
Waco, TX MSA	0.81	3,909	542,327	1,489	58,097	110	5,446	1	84	5,509	605,955	0.95
Wichita Falls, TX MSA	0.56	2,261	273,115	1,479	91,671	101	7,657	4	1,000	3,845	373,443	0.78
Yoakum County, TX Non-Metro	0.02	81	8,172	58	1,454	15	571	0	0	154	10,197	0.06

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: TEXAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Austin-Round Rock-San Marcos, TX MSA	31,935	11.60	2.79	1.78	18.90	10.78	42.63	48.23	35.68	39.20	22.28	18.34	21.73	23.66	20.95
Dallas-Plano-Irving, TX MD	60,238	21.87	2.57	0.84	20.21	8.51	36.31	36.04	40.91	54.61	25.17	27.03	27.80	26.09	24.14
El Paso, TX MSA	5,893	2.14	0.92	0.08	26.70	13.08	34.90	44.53	37.48	42.30	17.51	8.33	23.46	15.47	18.50
Fort Worth-Arlington, TX MD	30,715	11.15	3.14	0.54	18.57	8.24	43.89	44.83	34.39	46.39	24.85	30.11	25.44	25.50	24.10
Houston-Sugar Land-Baytown, TX MSA	78,743	28.59	2.87	1.31	23.19	9.28	32.97	29.08	40.97	60.33	23.77	23.95	24.99	23.71	23.61
Limited Review:															
Amarillo, TX MSA	1,294	0.47	1.19	0.23	22.92	7.96	44.82	53.86	31.06	37.94	8.75	0.00	11.26	9.63	7.18
Atlanta, TX Non-Metro	83	0.03	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.71	0.00	0.00	8.71	0.00
Beaumont-Port Arthur, TX MSA	2,636	0.96	3.21	0.30	15.67	5.16	54.46	52.43	26.66	42.11	19.77	10.00	27.91	18.38	20.81
Big Spring, TX Non-Metro	88	0.03	0.00	0.00	14.80	4.55	54.60	47.73	30.60	47.73	5.45	0.00	0.00	7.75	3.23
Borger, TX Non-Metro	102	0.04	0.00	0.00	10.01	1.96	29.44	12.75	60.55	85.29	12.03	0.00	7.14	10.00	12.69
Brazos Valley, TX Non-Metro	536	0.19	0.00	0.00	4.02	4.29	70.29	58.21	25.69	37.50	17.46	0.00	23.68	19.20	13.75
Brownsville-Harlingen, TX MSA	1,999	0.73	0.87	3.80	21.06	13.91	43.90	34.02	34.18	48.27	25.20	24.42	41.39	24.55	22.54
Central TX Non-Metro	660	0.24	0.00	0.00	0.00	0.00	52.39	41.36	47.61	58.64	16.95	0.00	0.00	18.25	16.04
College Station-Bryan, TX MSA	2,733	0.99	0.06	0.04	21.07	12.95	49.53	28.65	29.34	58.36	20.57	0.00	24.82	18.99	20.64
Corpus Christi, TX MSA	3,212	1.17	3.53	0.93	23.89	8.90	43.52	35.46	29.06	54.70	17.25	8.51	20.14	15.28	18.44
Garza County, TX Non-Metro	36	0.01	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	23.68	0.00	0.00	23.68	0.00
Hartley County, TX Non-Metro	28	0.01	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	24.44	0.00	0.00	0.00	24.44
Hill County, TX Non-Metro	183	0.07	0.00	0.00	7.86	2.73	82.34	93.44	9.80	3.83	22.36	0.00	20.00	22.44	22.73
Kerrville, TX Non-Metro	480	0.17	0.00	0.00	0.00	0.00	78.54	64.79	21.46	35.21	20.00	0.00	0.00	18.66	22.52
Killeen-Temple-Fort Hood, TX MSA	6,707	2.44	0.17	0.07	8.68	2.73	61.34	60.70	29.81	36.50	24.87	0.00	28.16	27.09	21.86
Laredo, TX MSA	1,525	0.55	0.12	0.00	34.45	18.43	33.06	18.36	32.37	63.21	25.04	0.00	35.63	25.00	23.23
Lubbock, TX MSA	4,788	1.74	0.26	0.19	23.78	8.10	43.81	42.42	32.15	49.29	25.64	40.00	26.71	26.29	24.91
McAllen-Edinburg-Mission, TX MSA	2,826	1.03	0.00	0.00	27.56	10.30	48.45	43.17	23.99	46.53	21.07	0.00	17.12	21.63	21.44
Midland, TX MSA	1,738	0.63	4.50	1.09	18.42	8.52	44.68	44.25	32.40	46.14	15.17	13.33	16.36	17.30	13.04
Montague County, TX Non-Metro	96	0.03	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	19.88	0.00	0.00	19.88	0.00
Odessa, TX MSA	1,264	0.46	2.25	1.03	15.94	3.88	43.46	26.27	38.35	68.83	20.30	11.11	20.63	16.45	22.13
Plainview, TX Non-Metro	250	0.09	0.00	0.00	18.86	8.00	62.48	58.80	18.66	33.20	25.71	0.00	25.93	26.77	24.03
San Angelo, TX MSA	1,353	0.49	0.93	0.67	15.85	5.99	54.08	53.95	29.15	39.39	23.93	16.67	25.77	25.56	21.65
San Antonio-New Braunfels, TX MSA	27,390	9.95	1.49	0.37	28.43	9.97	37.16	32.39	32.91	57.27	21.52	38.96	22.75	23.53	20.18
South TX Non-Metro	301	0.11	0.00	0.00	40.19	20.93	59.81	79.07	0.00	0.00	15.18	0.00	20.21	14.23	0.00
Southeastern TX Non-Metro	739	0.27	0.00	0.00	9.32	5.41	68.95	69.15	21.73	25.44	18.73	0.00	17.65	17.46	22.42
Victoria, TX MSA	1,102	0.40	1.51	0.18	19.84	13.70	54.88	47.01	23.77	39.11	22.54	100.00	21.02	20.63	25.64
Waco, TX MSA	2,380	0.86	4.80	2.31	18.68	9.24	36.55	22.61	39.97	65.84	20.13	18.82	16.52	18.19	21.60
Wichita Falls, TX MSA	1,302	0.47	1.52	0.00	16.68	8.53	51.23	51.84	30.57	39.63	16.66	0.00	14.77	17.16	16.44
Yoakum County, TX Non-Metro	40	0.01	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.46	0.00	0.00	13.46	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: TEXAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Austin-Round Rock-San Marcos, TX MSA	681	9.79	2.79	1.47	18.90	14.54	42.63	40.38	35.68	43.61	8.08	8.33	8.04	7.79	8.36
Dallas-Plano-Irving, TX MD	987	14.19	2.57	0.81	20.21	11.85	36.31	32.02	40.91	55.32	11.03	11.54	14.34	10.98	10.55
El Paso, TX MSA	301	4.33	0.92	0.66	26.70	16.28	34.90	39.53	37.48	43.52	5.29	0.00	4.27	6.30	4.79
Fort Worth-Arlington, TX MD	769	11.06	3.14	1.56	18.57	18.86	43.89	43.56	34.39	36.02	13.44	19.05	24.23	13.03	10.74
Houston-Sugar Land-Baytown, TX MSA	1,767	25.41	2.87	2.55	23.19	13.64	32.97	29.32	40.97	54.50	12.42	26.47	9.92	12.05	12.90
Limited Review:															
Amarillo, TX MSA	62	0.89	1.19	0.00	22.92	12.90	44.82	46.77	31.06	40.32	3.74	0.00	1.59	5.71	3.09
Atlanta, TX Non-Metro	2	0.03	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	5.13	0.00	0.00	5.13	0.00
Beaumont-Port Arthur, TX MSA	104	1.50	3.21	0.00	15.67	16.35	54.46	42.31	26.66	41.35	5.80	0.00	13.33	5.43	4.29
Big Spring, TX Non-Metro	21	0.30	0.00	0.00	14.80	9.52	54.60	42.86	30.60	47.62	28.57	0.00	16.67	25.00	40.00
Borger, TX Non-Metro	18	0.26	0.00	0.00	10.01	11.11	29.44	11.11	60.55	77.78	13.04	0.00	0.00	0.00	16.67
Brazos Valley, TX Non-Metro	60	0.86	0.00	0.00	4.02	1.67	70.29	70.00	25.69	28.33	14.81	0.00	12.50	17.95	4.55
Brownsville-Harlingen, TX MSA	201	2.89	0.87	2.99	21.06	19.40	43.90	41.29	34.18	36.32	16.54	25.00	11.76	14.56	20.18
Central TX Non-Metro	37	0.53	0.00	0.00	0.00	0.00	52.39	35.14	47.61	64.86	11.43	0.00	0.00	9.68	12.82
College Station-Bryan, TX MSA	66	0.95	0.06	0.00	21.07	12.12	49.53	36.36	29.34	51.52	9.27	0.00	16.13	11.11	4.00
Corpus Christi, TX MSA	142	2.04	3.53	0.70	23.89	16.20	43.52	57.75	29.06	25.35	11.56	0.00	12.90	13.07	9.74
Garza County, TX Non-Metro	13	0.19	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
Hartley County, TX Non-Metro	3	0.04	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	28.57	0.00	0.00	0.00	28.57
Hill County, TX Non-Metro	30	0.43	0.00	0.00	7.86	6.67	82.34	73.33	9.80	20.00	16.67	0.00	100.00	13.64	0.00
Kerrville, TX Non-Metro	44	0.63	0.00	0.00	0.00	0.00	78.54	79.55	21.46	20.45	13.95	0.00	0.00	15.63	9.09
Killeen-Temple-Fort Hood, TX MSA	74	1.06	0.17	0.00	8.68	8.11	61.34	63.51	29.81	28.38	2.84	0.00	3.70	2.00	3.61
Laredo, TX MSA	105	1.51	0.12	0.00	34.45	26.67	33.06	27.62	32.37	45.71	22.31	0.00	23.33	30.30	17.24
Lubbock, TX MSA	93	1.34	0.26	0.00	23.78	15.05	43.81	48.39	32.15	36.56	6.99	0.00	9.09	5.65	7.69
McAllen-Edinburg-Mission, TX MSA	197	2.83	0.00	0.00	27.56	21.83	48.45	51.27	23.99	26.90	13.31	0.00	15.48	12.58	12.73
Midland, TX MSA	102	1.47	4.50	0.00	18.42	15.69	44.68	50.00	32.40	34.31	12.20	0.00	12.00	14.10	10.71
Montague County, TX Non-Metro	17	0.24	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.38	0.00	0.00	15.38	0.00
Odessa, TX MSA	41	0.59	2.25	2.44	15.94	14.63	43.46	29.27	38.35	53.66	5.41	0.00	0.00	8.00	4.88
Plainview, TX Non-Metro	13	0.19	0.00	0.00	18.86	7.69	62.48	61.54	18.66	30.77	10.00	0.00	0.00	11.11	14.29
San Angelo, TX MSA	47	0.68	0.93	0.00	15.85	12.77	54.08	44.68	29.15	42.55	2.97	0.00	0.00	3.77	2.78
San Antonio-New Braunfels, TX MSA	612	8.80	1.49	1.47	28.43	24.02	37.16	38.73	32.91	35.78	6.67	16.67	9.87	7.21	4.87
South TX Non-Metro	61	0.88	0.00	0.00	40.19	34.43	59.81	65.57	0.00	0.00	20.97	0.00	25.00	19.05	0.00
Southeastern TX Non-Metro	80	1.15	0.00	0.00	9.32	8.75	68.95	63.75	21.73	27.50	8.62	0.00	0.00	10.58	8.51
Victoria, TX MSA	71	1.02	1.51	1.41	19.84	8.45	54.88	53.52	23.77	36.62	11.02	0.00	11.76	12.12	9.30
Waco, TX MSA	54	0.78	4.80	0.00	18.68	7.41	36.55	37.04	39.97	55.56	6.04	0.00	1.69	10.00	5.34
Wichita Falls, TX MSA	65	0.93	1.52	0.00	16.68	15.38	51.23	38.46	30.57	46.15	10.49	0.00	4.17	12.50	10.34
Yoakum County, TX Non-Metro	14	0.20	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	62.50	0.00	0.00	62.50	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Austin-Round Rock-San Marcos, TX MSA	27,304	14.83	2.79	1.02	18.90	8.21	42.63	38.83	35.68	51.94	18.72	13.94	17.81	20.07	17.99
Dallas-Plano-Irving, TX MD	48,160	26.15	2.57	0.58	20.21	4.58	36.31	27.59	40.91	67.26	19.48	21.55	20.84	20.98	18.76
El Paso, TX MSA	3,639	1.98	0.92	0.14	26.70	12.01	34.90	32.10	37.48	55.76	15.48	5.88	15.37	15.72	15.39
Fort Worth-Arlington, TX MD	20,841	11.32	3.14	0.44	18.57	5.63	43.89	37.66	34.39	56.27	20.40	23.15	21.79	21.51	19.54
Houston-Sugar Land-Baytown, TX MSA	44,001	23.90	2.87	1.02	23.19	6.61	32.97	23.19	40.97	69.18	18.01	17.54	16.33	19.04	17.85
Limited Review:															
Amarillo, TX MSA	1,184	0.64	1.19	0.08	22.92	6.76	44.82	45.86	31.06	47.30	10.11	0.00	5.75	10.56	10.47
Atlanta, TX Non-Metro	43	0.02	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.49	0.00	0.00	7.49	0.00
Beaumont-Port Arthur, TX MSA	1,341	0.73	3.21	0.07	15.67	5.00	54.46	46.61	26.66	48.32	16.06	7.14	18.40	15.60	16.36
Big Spring, TX Non-Metro	72	0.04	0.00	0.00	14.80	1.39	54.60	41.67	30.60	56.94	11.56	0.00	14.29	9.33	13.85
Borger, TX Non-Metro	52	0.03	0.00	0.00	10.01	3.85	29.44	7.69	60.55	88.46	9.40	0.00	0.00	11.76	9.68
Brazos Valley, TX Non-Metro	493	0.27	0.00	0.00	4.02	2.03	70.29	62.07	25.69	35.90	19.22	0.00	23.81	19.38	18.56
Brownsville-Harlingen, TX MSA	1,253	0.68	0.87	2.55	21.06	8.62	43.90	35.51	34.18	53.31	23.54	24.00	30.19	24.14	22.48
Central TX Non-Metro	761	0.41	0.00	0.00	0.00	0.00	52.39	40.60	47.61	59.40	16.90	0.00	0.00	16.77	16.99
College Station-Bryan, TX MSA	1,748	0.95	0.06	0.11	21.07	8.24	49.53	28.72	29.34	62.93	19.40	25.00	18.14	18.12	20.38
Corpus Christi, TX MSA	1,937	1.05	3.53	0.98	23.89	6.30	43.52	38.41	29.06	54.31	15.08	14.71	10.78	14.85	15.87
Garza County, TX Non-Metro	14	0.01	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	11.11	0.00	0.00	11.11	0.00
Hartley County, TX Non-Metro	16	0.01	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	12.20	0.00	0.00	0.00	12.20
Hill County, TX Non-Metro	183	0.10	0.00	0.00	7.86	2.73	82.34	87.98	9.80	9.29	23.25	0.00	50.00	22.97	20.00
Kerrville, TX Non-Metro	506	0.27	0.00	0.00	0.00	0.00	78.54	69.17	21.46	30.83	22.70	0.00	0.00	22.47	23.26
Killeen-Temple-Fort Hood, TX MSA	3,237	1.76	0.17	0.00	8.68	2.35	61.34	52.49	29.81	45.17	20.21	0.00	17.65	19.40	21.34
Laredo, TX MSA	630	0.34	0.12	0.00	34.45	9.84	33.06	18.57	32.37	71.59	20.06	0.00	23.73	24.05	18.90
Lubbock, TX MSA	2,242	1.22	0.26	0.04	23.78	6.42	43.81	34.26	32.15	59.28	19.74	0.00	13.96	21.02	19.61
McAllen-Edinburg-Mission, TX MSA	1,637	0.89	0.00	0.00	27.56	10.75	48.45	38.85	23.99	50.40	19.61	0.00	18.47	19.46	19.96
Midland, TX MSA	776	0.42	4.50	0.64	18.42	5.41	44.68	42.65	32.40	51.29	11.67	0.00	7.92	11.21	12.61
Montague County, TX Non-Metro	108	0.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	20.25	0.00	0.00	20.25	0.00
Odessa, TX MSA	524	0.28	2.25	0.95	15.94	5.53	43.46	31.30	38.35	62.21	14.19	0.00	11.11	13.81	14.57
Plainview, TX Non-Metro	143	0.08	0.00	0.00	18.86	2.80	62.48	55.94	18.66	41.26	21.72	0.00	7.69	19.82	25.77
San Angelo, TX MSA	846	0.46	0.93	0.24	15.85	3.66	54.08	44.21	29.15	51.89	18.56	100.00	10.91	16.40	21.23
San Antonio-New Braunfels, TX MSA	16,504	8.96	1.49	0.13	28.43	6.29	37.16	28.59	32.91	64.98	17.66	10.26	15.29	18.54	17.55
South TX Non-Metro	235	0.13	0.00	0.00	40.19	19.15	59.81	80.85	0.00	0.00	16.58	0.00	11.84	17.76	0.00
Southeastern TX Non-Metro	570	0.31	0.00	0.00	9.32	3.51	68.95	69.12	21.73	27.37	24.29	0.00	17.95	26.60	19.70
Victoria, TX MSA	749	0.41	1.51	0.00	19.84	6.54	54.88	48.06	23.77	45.39	26.48	0.00	26.32	24.88	28.65
Waco, TX MSA	1,474	0.80	4.80	1.29	18.68	5.16	36.55	28.63	39.97	64.93	18.08	13.64	6.21	17.70	19.53
Wichita Falls, TX MSA	893	0.48	1.52	0.00	16.68	6.94	51.23	49.50	30.57	43.56	17.04	0.00	12.71	17.77	17.08
Yoakum County, TX Non-Metro	27	0.01	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	19.44	0.00	0.00	19.44	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: TEXAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Austin-Round Rock-San Marcos, TX MSA	51	16.04	18.86	9.80	30.99	33.33	35.24	49.02	14.91	7.84	22.06	37.50	31.58	19.35	0.00
Dallas-Plano-Irving, TX MD	61	19.18	14.32	14.75	30.42	40.98	33.46	22.95	21.80	21.31	12.50	16.67	18.60	6.67	7.14
El Paso, TX MSA	10	3.14	11.43	0.00	31.34	40.00	26.23	30.00	31.00	30.00	7.14	0.00	0.00	11.11	11.76
Fort Worth-Arlington, TX MD	31	9.75	7.03	6.45	28.60	19.35	45.61	45.16	18.76	29.03	12.50	33.33	0.00	16.13	11.11
Houston-Sugar Land-Baytown, TX MSA	80	25.16	9.84	5.00	35.87	33.75	30.30	31.25	23.99	30.00	10.81	0.00	4.88	16.07	13.16
<b>Limited Review:</b>															
Amarillo, TX MSA	4	1.26	2.20	0.00	28.94	0.00	38.55	75.00	30.31	25.00	27.27	0.00	0.00	50.00	50.00
Atlanta, TX Non-Metro	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
Beaumont-Port Arthur, TX MSA	9	2.83	6.11	0.00	27.01	11.11	35.64	66.67	31.24	22.22	12.50	0.00	0.00	22.22	0.00
Big Spring, TX Non-Metro	0	0.00	0.00	0.00	4.73	0.00	81.87	0.00	13.40	0.00	0.00	0.00	0.00	0.00	0.00
Borger, TX Non-Metro	0	0.00	0.00	0.00	46.02	0.00	4.09	0.00	49.89	0.00	0.00	0.00	0.00	0.00	0.00
Brazos Valley, TX Non-Metro	1	0.31	0.00	0.00	6.44	0.00	41.25	0.00	52.31	100.00	0.00	0.00	0.00	0.00	0.00
Brownsville-Harlingen, TX MSA	8	2.52	2.93	0.00	15.31	0.00	19.84	62.50	61.92	37.50	0.00	0.00	0.00	0.00	0.00
Central TX Non-Metro	1	0.31	0.00	0.00	0.00	0.00	67.66	100.00	32.34	0.00	0.00	0.00	0.00	0.00	0.00
College Station-Bryan, TX MSA	2	0.63	7.28	0.00	31.15	0.00	52.47	50.00	9.11	50.00	4.55	0.00	0.00	0.00	20.00
Corpus Christi, TX MSA	6	1.89	7.25	0.00	14.32	33.33	46.80	50.00	31.63	16.67	17.65	0.00	12.50	20.00	25.00
Garza County, TX Non-Metro	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
Hartley County, TX Non-Metro	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
Hill County, TX Non-Metro	0	0.00	0.00	0.00	31.26	0.00	51.88	0.00	16.85	0.00	0.00	0.00	0.00	0.00	0.00
Kerrville, TX Non-Metro	1	0.31	0.00	0.00	0.00	0.00	89.46	0.00	10.54	100.00	0.00	0.00	0.00	0.00	0.00
Killeen-Temple-Fort Hood, TX MSA	2	0.63	3.31	0.00	34.62	0.00	47.21	50.00	14.87	50.00	0.00	0.00	0.00	0.00	0.00
Laredo, TX MSA	2	0.63	2.50	0.00	18.94	50.00	41.52	50.00	37.04	0.00	0.00	0.00	0.00	0.00	0.00
Lubbock, TX MSA	2	0.63	9.24	0.00	29.60	0.00	43.18	50.00	17.98	50.00	0.00	0.00	0.00	0.00	0.00
McAllen-Edinburg-Mission, TX MSA	5	1.57	0.00	0.00	11.56	20.00	31.77	20.00	56.67	60.00	4.76	0.00	0.00	0.00	10.00
Midland, TX MSA	2	0.63	2.26	0.00	4.69	0.00	42.21	100.00	50.85	0.00	0.00	0.00	0.00	0.00	0.00
Montague County, TX Non-Metro	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
Odessa, TX MSA	1	0.31	0.72	0.00	15.47	0.00	29.62	100.00	54.19	0.00	20.00	0.00	0.00	50.00	0.00
Plainview, TX Non-Metro	0	0.00	0.00	0.00	40.49	0.00	42.19	0.00	17.32	0.00	0.00	0.00	0.00	0.00	0.00
San Angelo, TX MSA	2	0.63	1.95	0.00	22.15	0.00	37.89	50.00	38.01	50.00	25.00	0.00	0.00	100.00	0.00
San Antonio-New Braunfels, TX MSA	34	10.69	1.81	0.00	35.34	47.06	40.82	35.29	22.03	17.65	15.09	0.00	15.79	20.00	7.14
South TX Non-Metro	0	0.00	0.00	0.00	14.41	0.00	85.59	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Southeastern TX Non-Metro	0	0.00	0.00	0.00	6.18	0.00	77.31	0.00	16.51	0.00	0.00	0.00	0.00	0.00	0.00
Victoria, TX MSA	1	0.31	1.83	0.00	33.30	0.00	43.24	100.00	21.62	0.00	0.00	0.00	0.00	0.00	0.00
Waco, TX MSA	1	0.31	26.63	100.00	38.25	0.00	18.33	0.00	16.78	0.00	0.00	0.00	0.00	0.00	0.00
Wichita Falls, TX MSA	1	0.31	1.83	0.00	23.79	0.00	25.70	100.00	48.67	0.00	0.00	0.00	0.00	0.00	0.00
Yoakum County, TX Non-Metro	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

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses			Geography: TEXAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Small Business		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>															
Austin-Round Rock-San Marcos, TX	30	14.23	3.75	3.48	15.81	14.71	38.77	34.52	41.62	47.29	22.34	21.56	21.97	20.29	24.95
Dallas-Plano-Irving, TX MD	31	14.88	3.24	2.65	18.97	17.23	32.71	32.57	43.99	47.54	10.84	9.79	10.30	11.39	10.80
El Paso, TX MSA	8	4.24	6.19	7.65	26.37	25.13	28.59	24.41	38.85	42.81	24.66	37.07	22.95	22.15	25.45
Fort Worth-Arlington, TX MD	22	10.73	2.49	2.50	18.62	20.26	40.58	38.07	38.31	39.18	18.39	31.05	18.85	19.13	17.74
Houston-Sugar Land-Baytown, TX	65	31.03	3.66	3.16	20.66	17.22	28.26	27.54	46.87	52.08	16.35	13.70	13.74	16.71	17.97
<b>Limited Review:</b>															
Amarillo, TX MSA	2	1.00	8.49	6.63	21.04	19.17	40.55	36.98	29.92	37.22	6.92	5.23	15.85	5.12	6.24
Atlanta, TX Non-Metro	49	0.02	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	8.61	0.00	0.00	10.61	0.00
Beaumont-Port Arthur, TX MSA	2	1.33	2.57	1.32	17.25	16.16	49.33	45.52	30.82	37.01	14.46	16.88	14.55	13.50	17.11
Big Spring, TX Non-Metro	228	0.11	0.00	0.00	25.39	32.89	48.63	44.30	25.98	22.81	14.85	0.00	30.00	12.35	9.09
Borger, TX Non-Metro	172	0.08	0.00	0.00	27.90	34.30	18.62	29.07	53.48	36.63	23.19	0.00	33.73	25.00	17.74
Brazos Valley, TX Non-Metro	977	0.46	0.00	0.00	4.38	5.42	68.86	56.29	26.76	38.28	23.64	0.00	27.27	24.94	28.36
Brownsville-Harlingen, TX MSA	2	1.38	2.78	2.90	21.94	24.33	34.70	32.28	40.58	40.50	19.94	20.48	25.72	20.13	18.13
Central TX Non-Metro	910	0.43	0.00	0.00	0.00	0.00	57.98	54.29	42.02	45.71	20.34	0.00	0.00	18.27	25.83
College Station-Bryan, TX MSA	1	0.87	0.98	1.42	21.37	18.27	42.53	38.93	34.82	41.38	16.89	15.79	14.06	20.89	16.89
Corpus Christi, TX MSA	2	1.41	9.00	8.41	20.22	19.64	40.41	38.72	30.37	33.22	15.29	22.15	12.37	15.45	15.89
Garza County, TX Non-Metro	119	0.06	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	35.19	0.00	0.00	37.62	0.00
Hartley County, TX Non-Metro	25	0.01	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	8.08	0.00	0.00	0.00	8.33
Hill County, TX Non-Metro	341	0.16	0.00	0.00	11.72	9.09	75.33	76.25	12.95	14.66	29.82	0.00	37.50	31.40	40.00
Kerrville, TX Non-Metro	1	0.76	0.00	0.00	0.00	0.00	82.93	83.63	17.07	16.37	40.45	0.00	0.00	42.56	39.33
Killeen-Temple-Fort Hood, TX MSA	662	0.31	2.66	1.51	14.20	20.09	53.61	47.13	29.54	31.27	6.00	5.45	11.36	5.15	6.12
Laredo, TX MSA	1	0.69	4.33	7.27	18.94	15.83	21.74	24.67	54.99	52.23	10.57	19.12	10.57	15.18	8.82
Lubbock, TX MSA	2	1.03	0.46	0.46	18.87	19.98	41.50	37.72	39.17	41.84	11.66	4.76	20.67	9.73	10.53
McAllen-Edinburg-Mission, TX MSA	2	1.27	0.00	0.00	19.10	16.67	40.58	39.08	40.32	44.26	9.16	0.00	9.02	11.67	8.55
Midland, TX MSA	1	0.84	4.80	4.72	25.92	25.58	35.52	31.48	33.77	38.22	19.46	14.84	32.02	13.85	19.75
Montague County, TX Non-Metro	198	0.09	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	21.69	0.00	0.00	23.79	0.00
Odessa, TX MSA	508	0.24	1.24	0.98	16.49	18.70	39.30	32.28	42.97	48.03	7.20	5.26	13.97	4.74	7.12
Plainview, TX Non-Metro	321	0.15	0.00	0.00	14.22	16.51	63.74	56.39	22.04	27.10	14.58	0.00	13.98	15.44	14.11
San Angelo, TX MSA	1	0.50	1.56	1.80	12.58	14.49	53.52	46.97	32.35	36.74	24.90	25.00	26.00	26.19	24.17
San Antonio-New Braunfels, TX MSA	16	7.98	1.30	1.39	22.41	18.26	34.76	36.51	41.34	43.84	15.66	13.44	14.51	18.83	14.66
South TX Non-Metro	865	0.41	0.00	0.00	31.85	36.65	68.15	63.35	0.00	0.00	29.76	0.00	36.64	28.96	0.00
Southeastern TX Non-Metro	2	0.98	0.00	0.00	9.09	13.23	66.16	72.20	24.75	14.57	32.06	0.00	36.97	38.12	21.92
Victoria, TX MSA	1	0.90	0.89	0.68	25.42	31.24	48.76	37.88	24.94	30.19	23.13	16.67	33.44	18.28	22.34
Waco, TX MSA	1	0.70	3.94	3.49	24.81	29.01	28.32	30.96	42.93	36.53	16.61	12.99	25.47	17.85	12.65
Wichita Falls, TX MSA	1	0.70	0.74	0.14	25.57	23.33	38.22	33.67	35.47	42.87	27.10	0.00	28.73	29.09	27.65
Yoakum County, TX Non-Metro	58	0.03	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	22.95	0.00	0.00	24.78	0.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms															
Geography: TEXAS															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
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>															
Austin-Round Rock-San Marcos, TX MSA	291	6.67	1.92	4.47	17.44	17.87	46.29	31.96	34.34	45.70	25.08	100.00	31.34	13.29	44.19
Dallas-Plano-Irving, TX MD	214	4.90	2.11	0.93	16.79	11.21	42.98	46.26	37.78	41.59	10.08	25.00	6.06	9.82	12.21
El Paso, TX MSA	55	1.26	3.22	7.27	32.85	18.18	25.12	21.82	38.81	52.73	58.62	100.00	66.67	80.00	66.67
Fort Worth-Arlington, TX MD	264	6.05	1.30	3.03	13.67	12.50	53.13	64.39	31.90	20.08	43.56	66.67	33.33	49.19	34.55
Houston-Sugar Land-Baytown, TX MSA	642	14.71	2.48	0.31	18.32	9.97	38.18	42.83	40.83	46.88	30.73	33.33	15.25	32.92	39.09
<b>Limited Review:</b>															
Amarillo, TX MSA	159	3.64	5.04	10.06	6.45	5.03	55.21	40.25	33.30	44.65	8.59	22.22	16.67	5.11	12.74
Atlanta, TX Non-Metro	4	0.09	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
Beaumont-Port Arthur, TX MSA	37	0.85	1.25	0.00	10.13	2.70	60.23	43.24	28.39	54.05	12.82	100.00	0.00	11.36	13.33
Big Spring, TX Non-Metro	49	1.12	0.00	0.00	5.29	0.00	61.76	63.27	32.94	36.73	33.33	0.00	0.00	23.53	50.00
Borger, TX Non-Metro	0	0.00	0.00	0.00	4.62	0.00	44.62	0.00	50.77	0.00	0.00	0.00	0.00	0.00	0.00
Brazos Valley, TX Non-Metro	112	2.57	0.00	0.00	1.84	7.14	75.22	61.61	22.94	31.25	18.07	0.00	50.00	16.67	25.71
Brownsville-Harlingen, TX MSA	75	1.72	1.09	0.00	8.21	54.67	54.20	28.00	36.50	17.33	38.98	0.00	80.00	41.46	16.67
Central TX Non-Metro	23	0.53	0.00	0.00	0.00	0.00	44.78	39.13	55.22	60.87	7.59	0.00	0.00	11.76	4.55
College Station-Bryan, TX MSA	73	1.67	0.09	0.00	12.56	6.85	50.86	56.16	36.49	36.99	12.25	0.00	6.25	12.80	17.07
Corpus Christi, TX MSA	113	2.59	4.47	3.54	14.92	23.89	48.20	38.05	32.40	34.51	21.19	50.00	34.78	15.19	22.50
Garza County, TX Non-Metro	48	1.10	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	100.00	0.00	0.00	100.00	0.00
Hartley County, TX Non-Metro	31	0.71	0.00	0.00	0.00	0.00	0.00	0.00	100.00	100.00	10.53	0.00	0.00	0.00	10.67
Hill County, TX Non-Metro	76	1.74	0.00	0.00	0.71	1.32	81.07	81.58	18.21	17.11	64.71	0.00	0.00	68.18	70.00
Kerrville, TX Non-Metro	42	0.96	0.00	0.00	0.00	0.00	81.23	92.86	18.77	7.14	37.84	0.00	0.00	41.94	20.00
Killeen-Temple-Fort Hood, TX MSA	30	0.69	0.64	0.00	7.16	13.33	54.55	33.33	37.65	53.33	3.27	0.00	50.00	0.70	6.25
Laredo, TX MSA	7	0.16	2.02	0.00	14.57	0.00	24.70	28.57	58.70	71.43	10.53	0.00	0.00	0.00	22.22
Lubbock, TX MSA	137	3.14	0.07	0.00	13.84	14.60	43.76	27.74	42.32	57.66	7.44	0.00	15.15	4.32	9.60
McAllen-Edinburg-Mission, TX MSA	19	0.44	0.00	0.00	16.41	10.53	46.52	36.84	37.07	52.63	5.19	0.00	5.26	0.00	13.04
Midland, TX MSA	29	0.66	2.38	0.00	23.38	6.90	42.42	55.17	31.82	37.93	23.08	0.00	33.33	20.00	25.00
Montague County, TX Non-Metro	14	0.32	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	27.78	0.00	0.00	29.41	0.00
Odessa, TX MSA	5	0.11	0.00	0.00	5.14	0.00	46.26	20.00	48.60	80.00	20.00	0.00	0.00	100.00	16.67
Plainview, TX Non-Metro	159	3.64	0.00	0.00	3.59	0.00	82.76	96.23	13.64	3.77	13.10	0.00	0.00	15.55	2.44
San Angelo, TX MSA	42	0.96	0.49	0.00	3.62	0.00	65.57	88.10	30.31	11.90	50.00	0.00	0.00	66.67	0.00
San Antonio-New Braunfels, TX MSA	493	11.30	0.58	0.00	14.67	9.13	45.67	69.37	38.90	21.50	38.91	0.00	59.09	45.09	27.38
South TX Non-Metro	49	1.12	0.00	0.00	39.75	44.90	60.25	55.10	0.00	0.00	39.47	0.00	50.00	38.10	0.00
Southeastern TX Non-Metro	749	17.16	0.00	0.00	7.14	10.55	73.48	74.10	19.38	15.35	33.10	0.00	61.76	33.56	24.24
Victoria, TX MSA	97	2.22	0.36	0.00	10.16	5.15	68.42	64.95	21.05	29.90	9.02	0.00	0.00	8.08	15.00
Waco, TX MSA	110	2.52	1.39	0.00	8.74	0.91	47.30	37.27	42.57	61.82	38.46	0.00	0.00	16.67	66.67
Wichita Falls, TX MSA	101	2.31	0.00	0.00	12.22	19.80	52.72	72.28	35.05	7.92	52.63	0.00	80.00	58.97	50.00
Yoakum County, TX Non-Metro	15	0.34	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	12.82	0.00	0.00	14.71	0.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: TEXAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Austin-Round Rock-San Marcos, TX MSA	31,936	11.59	19.76	6.72	18.30	22.12	22.76	25.44	39.17	45.71	22.14	20.87	21.99	23.26	21.85
Dallas-Plano-Irving, TX MD	60,241	21.87	21.32	7.34	18.00	20.93	20.39	24.40	40.30	47.33	23.98	25.25	23.77	24.82	23.49
El Paso, TX MSA	5,893	2.14	22.11	1.85	17.46	10.49	18.92	25.47	41.51	62.19	17.04	16.86	14.09	15.49	18.42
Fort Worth-Arlington, TX MD	30,715	11.15	19.56	8.77	18.78	24.67	21.95	26.59	39.71	39.97	23.60	25.22	23.84	24.26	22.70
Houston-Sugar Land-Baytown, TX MSA	78,834	28.62	22.61	5.17	17.36	19.75	18.97	23.91	41.06	51.16	23.41	25.50	22.56	24.14	23.19
<b>Limited Review:</b>															
Amarillo, TX MSA	1,294	0.47	19.77	7.07	18.63	20.12	21.81	25.76	39.78	47.05	7.72	7.09	7.53	6.89	8.44
Atlanta, TX Non-Metro	83	0.03	22.26	2.56	18.57	12.82	21.22	28.21	37.95	56.41	7.35	0.00	5.41	5.56	10.34
Beaumont-Port Arthur, TX MSA	2,636	0.96	22.47	3.16	17.06	17.04	20.02	26.36	40.44	53.44	18.35	12.67	18.97	17.18	19.30
Big Spring, TX Non-Metro	88	0.03	20.67	3.45	16.82	9.20	21.37	21.84	41.15	65.52	6.12	0.00	7.32	3.30	8.49
Borger, TX Non-Metro	102	0.04	14.95	4.26	15.56	5.32	20.78	20.21	48.70	70.21	10.45	0.00	4.35	9.23	12.80
Brazos Valley, TX Non-Metro	536	0.19	18.47	2.12	16.78	9.62	19.85	19.62	44.90	68.65	17.51	17.24	10.34	13.66	20.60
Brownsville-Harlingen, TX MSA	1,999	0.73	23.75	1.33	16.04	9.86	17.82	17.50	42.40	71.31	24.44	26.09	27.05	27.95	23.23
Central TX Non-Metro	660	0.24	13.82	0.78	16.26	7.49	21.04	15.76	48.88	75.98	17.48	14.29	19.51	13.98	17.79
College Station-Bryan, TX MSA	2,733	0.99	23.88	3.25	16.53	16.17	18.30	23.38	41.29	57.19	21.34	19.19	22.50	22.52	20.73
Corpus Christi, TX MSA	3,212	1.17	22.82	3.18	16.99	13.02	19.76	26.99	40.43	56.81	17.04	20.00	17.12	16.98	16.88
Garza County, TX Non-Metro	36	0.01	24.66	0.00	19.51	25.71	25.46	20.00	30.37	54.29	23.53	0.00	25.00	36.36	17.65
Hartley County, TX Non-Metro	28	0.01	8.05	3.57	10.71	3.57	18.09	21.43	63.15	71.43	26.83	100.00	0.00	37.50	23.33
Hill County, TX Non-Metro	183	0.07	18.98	4.68	17.35	13.45	22.08	20.47	41.58	61.40	19.07	22.22	17.24	10.53	23.33
Kerrville, TX Non-Metro	480	0.17	15.86	1.27	16.38	9.98	22.08	21.66	45.68	67.09	20.15	20.00	12.50	16.67	23.72
Killeen-Temple-Fort Hood, TX MSA	6,707	2.43	17.01	3.26	19.97	20.54	23.75	35.86	39.27	40.34	23.95	18.41	25.23	25.66	22.55
Laredo, TX MSA	1,525	0.55	22.96	1.50	16.89	13.75	18.19	23.21	41.96	61.53	22.08	22.22	24.11	23.27	21.23
Lubbock, TX MSA	4,788	1.74	21.02	6.37	17.88	19.79	20.74	25.61	40.36	48.24	25.15	29.08	29.06	27.79	22.45
McAllen-Edinburg-Mission, TX MSA	2,826	1.03	23.48	0.75	16.86	6.36	17.67	15.75	41.98	77.14	19.55	15.63	21.29	19.55	19.43
Midland, TX MSA	1,738	0.63	20.88	4.05	18.60	15.74	19.33	25.54	41.20	54.67	16.44	13.91	16.04	18.35	15.93
Montague County, TX Non-Metro	96	0.03	18.79	2.27	16.82	17.05	23.51	26.14	40.87	54.55	18.57	0.00	25.93	27.27	15.66
Odessa, TX MSA	1,264	0.46	21.22	3.42	17.50	20.70	21.98	29.99	39.30	45.88	20.87	23.08	20.17	23.18	19.53
Plainview, TX Non-Metro	250	0.09	19.60	6.47	20.54	23.28	22.27	26.72	37.60	43.53	24.33	44.44	22.03	24.49	22.40
San Angelo, TX MSA	1,353	0.49	19.37	6.76	18.37	19.38	22.73	30.70	39.53	43.16	24.63	28.42	28.02	26.19	21.87
San Antonio-New Braunfels, TX MSA	27,397	9.94	21.16	5.19	17.99	18.58	20.54	27.58	40.31	48.65	20.44	22.91	20.09	20.55	20.26
South TX Non-Metro	301	0.11	28.87	2.10	17.89	8.39	19.50	26.22	33.74	63.29	14.93	0.00	12.86	15.63	15.56
Southeastern TX Non-Metro	739	0.27	20.41	2.80	16.95	11.19	19.86	23.92	42.79	62.10	17.95	27.27	14.89	24.37	15.61
Victoria, TX MSA	1,102	0.40	21.10	4.14	17.47	16.92	20.57	26.97	40.86	51.97	21.79	21.28	22.56	21.75	21.62
Waco, TX MSA	2,380	0.86	20.68	4.61	17.54	19.26	21.36	26.84	40.42	49.29	19.65	17.33	17.89	20.49	20.15
Wichita Falls, TX MSA	1,302	0.47	18.22	7.10	19.08	19.31	23.92	28.55	38.78	45.05	15.71	11.76	17.48	17.12	14.82
Yoakum County, TX Non-Metro	40	0.01	21.57	0.00	18.07	7.50	19.84	15.00	40.52	77.50	14.89	0.00	10.53	16.67	15.69

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 4.4% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: TEXAS					Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Austin-Round Rock-San Marcos, TX MSA	681	9.79	19.76	6.84	18.30	17.83	22.76	26.00	39.17	49.33	8.23	9.20	8.72	6.91	8.51
Dallas-Plano-Irving, TX MD	987	14.19	21.32	5.54	18.00	15.61	20.39	21.05	40.30	57.80	11.35	11.49	15.32	14.88	9.62
El Paso, TX MSA	301	4.33	22.11	5.03	17.46	11.07	18.92	21.14	41.51	62.75	5.18	4.76	4.72	4.15	5.54
Fort Worth-Arlington, TX MD	769	11.06	19.56	9.61	18.78	19.63	21.95	26.03	39.71	44.73	13.35	13.89	19.92	15.86	10.72
Houston-Sugar Land-Baytown, TX MSA	1,769	25.43	22.61	7.39	17.36	15.00	18.97	19.38	41.06	58.24	13.02	14.18	16.84	14.93	11.58
Limited Review:															
Amarillo, TX MSA	62	0.89	19.77	6.56	18.63	26.23	21.81	24.59	39.78	42.62	3.67	1.35	4.00	4.49	4.20
Atlanta, TX Non-Metro	2	0.03	22.26	0.00	18.57	0.00	21.22	50.00	37.95	50.00	5.26	0.00	0.00	9.09	5.00
Beaumont-Port Arthur, TX MSA	104	1.50	22.47	6.93	17.06	15.84	20.02	27.72	40.44	49.50	5.79	7.32	6.45	8.73	4.00
Big Spring, TX Non-Metro	21	0.30	20.67	14.29	16.82	4.76	21.37	9.52	41.15	71.43	32.00	50.00	0.00	25.00	38.46
Borger, TX Non-Metro	18	0.26	14.95	0.00	15.56	5.56	20.78	16.67	48.70	77.78	13.04	0.00	25.00	0.00	14.29
Brazos Valley, TX Non-Metro	60	0.86	18.47	5.00	16.78	10.00	19.85	16.67	44.90	68.33	14.95	7.69	13.33	22.73	14.04
Brownsville-Harlingen, TX MSA	201	2.89	23.75	8.63	16.04	13.71	17.82	21.32	42.40	56.35	16.47	14.29	17.14	11.43	19.12
Central TX Non-Metro	37	0.53	13.82	0.00	16.26	5.41	21.04	8.11	48.88	86.49	12.31	0.00	11.11	0.00	17.07
College Station-Bryan, TX MSA	66	0.95	23.88	9.23	16.53	9.23	18.30	21.54	41.29	60.00	9.68	14.29	11.54	14.71	7.14
Corpus Christi, TX MSA	142	2.04	22.82	6.34	16.99	20.42	19.76	25.35	40.43	47.89	12.33	7.69	22.73	15.56	9.29
Garza County, TX Non-Metro	13	0.19	24.66	0.00	19.51	0.00	25.46	38.46	30.37	61.54	0.00	0.00	0.00	0.00	0.00
Hartley County, TX Non-Metro	3	0.04	8.05	0.00	10.71	0.00	18.09	66.67	63.15	33.33	28.57	0.00	0.00	100.00	0.00
Hill County, TX Non-Metro	30	0.43	18.98	10.00	17.35	13.33	22.08	20.00	41.58	56.67	17.39	100.00	25.00	0.00	18.18
Kerrville, TX Non-Metro	44	0.63	15.86	4.65	16.38	18.60	22.08	23.26	45.68	53.49	16.67	0.00	42.86	20.00	9.09
Killeen-Temple-Fort Hood, TX MSA	74	1.06	17.01	2.70	19.97	2.70	23.75	36.49	39.27	58.11	2.93	0.00	0.00	4.26	3.70
Laredo, TX MSA	105	1.51	22.96	1.90	16.89	14.29	18.19	17.14	41.96	66.67	24.11	10.00	37.50	37.50	20.00
Lubbock, TX MSA	93	1.34	21.02	7.95	17.88	17.05	20.74	27.27	40.36	47.73	7.79	5.56	17.65	7.58	5.56
McAllen-Edinburg-Mission, TX MSA	197	2.83	23.48	6.63	16.86	12.24	17.67	17.35	41.98	63.78	14.79	30.77	16.13	18.33	12.56
Midland, TX MSA	102	1.47	20.88	7.07	18.60	15.15	19.33	24.24	41.20	53.54	13.16	6.67	3.45	28.57	10.96
Montague County, TX Non-Metro	17	0.24	18.79	11.76	16.82	29.41	23.51	41.18	40.87	17.65	15.38	25.00	0.00	33.33	0.00
Odessa, TX MSA	41	0.59	21.22	4.88	17.50	17.07	21.98	19.51	39.30	58.54	5.48	0.00	14.29	0.00	6.25
Plainview, TX Non-Metro	13	0.19	19.60	7.69	20.54	30.77	22.27	30.77	37.60	30.77	10.26	50.00	25.00	0.00	5.00
San Angelo, TX MSA	47	0.68	19.37	8.89	18.37	24.44	22.73	22.22	39.53	44.44	3.08	6.25	7.89	0.00	2.13
San Antonio-New Braunfels, TX MSA	612	8.80	21.16	15.46	17.99	16.97	20.54	22.69	40.31	44.87	6.53	12.23	6.58	6.43	5.59
South TX Non-Metro	61	0.88	28.87	9.84	17.89	18.03	19.50	32.79	33.74	39.34	21.31	50.00	41.67	20.00	13.51
Southeastern TX Non-Metro	80	1.15	20.41	3.75	16.95	17.50	19.86	23.75	42.79	55.00	8.72	0.00	8.70	9.76	9.78
Victoria, TX MSA	71	1.02	21.10	5.63	17.47	11.27	20.57	33.80	40.86	49.30	11.86	25.00	0.00	14.81	10.29
Waco, TX MSA	54	0.78	20.68	1.85	17.54	24.07	21.36	16.67	40.42	57.41	6.27	4.17	7.41	1.79	7.84
Wichita Falls, TX MSA	65	0.93	18.22	6.15	19.08	10.77	23.92	29.23	38.78	53.85	11.41	11.11	7.69	15.63	10.98
Yoakum County, TX Non-Metro	14	0.20	21.57	7.69	18.07	7.69	19.84	7.69	40.52	76.92	62.50	50.00	0.00	50.00	75.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: TEXAS						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Austin-Round Rock-San Marcos, TX MSA	27,304	14.82	19.76	2.76	18.30	12.24	22.76	21.57	39.17	63.43	19.29	16.37	19.31	18.65	19.70
Dallas-Plano-Irving, TX MD	48,163	26.15	21.32	2.41	18.00	9.44	20.39	19.06	40.30	69.10	19.77	18.66	19.50	20.19	19.75
El Paso, TX MSA	3,639	1.98	22.11	1.43	17.46	7.44	18.92	16.23	41.51	74.91	15.33	12.87	13.61	15.75	15.48
Fort Worth-Arlington, TX MD	20,841	11.31	19.56	3.28	18.78	11.36	21.95	21.73	39.71	63.63	20.59	23.16	20.78	21.04	20.24
Houston-Sugar Land-Baytown, TX MSA	44,039	23.91	22.61	1.67	17.36	8.05	18.97	16.46	41.06	73.82	19.37	15.29	18.33	18.41	19.88
<b>Limited Review:</b>															
Amarillo, TX MSA	1,184	0.64	19.77	2.19	18.63	12.21	21.81	20.04	39.78	65.55	10.69	8.94	12.37	9.49	10.97
Atlanta, TX Non-Metro	43	0.02	22.26	3.33	18.57	3.33	21.22	16.67	37.95	76.67	5.77	0.00	0.00	5.88	7.07
Beaumont-Port Arthur, TX MSA	1,341	0.73	22.47	1.39	17.06	7.97	20.02	17.59	40.44	73.05	17.29	12.12	16.44	14.00	18.56
Big Spring, TX Non-Metro	72	0.04	20.67	0.00	16.82	9.62	21.37	21.15	41.15	69.23	9.65	0.00	0.00	7.41	12.68
Borger, TX Non-Metro	52	0.03	14.95	0.00	15.56	12.20	20.78	17.07	48.70	70.73	9.71	0.00	33.33	17.65	6.58
Brazos Valley, TX Non-Metro	493	0.27	18.47	1.13	16.78	3.62	19.85	11.31	44.90	83.94	20.67	21.43	16.67	11.54	23.00
Brownsville-Harlingen, TX MSA	1,253	0.68	23.75	0.19	16.04	2.73	17.82	8.76	42.40	88.32	24.68	0.00	16.07	24.63	25.29
Central TX Non-Metro	761	0.41	13.82	0.73	16.26	3.67	21.04	11.44	48.88	84.16	18.65	7.14	11.36	20.63	18.85
College Station-Bryan, TX MSA	1,748	0.95	23.88	1.69	16.53	6.24	18.30	15.28	41.29	76.79	21.06	17.50	17.53	18.29	22.17
Corpus Christi, TX MSA	1,937	1.05	22.82	1.77	16.99	6.36	19.76	15.93	40.43	75.93	15.15	12.35	9.29	14.06	16.34
Garza County, TX Non-Metro	14	0.01	24.66	0.00	19.51	7.69	25.46	7.69	30.37	84.62	14.29	0.00	0.00	0.00	18.18
Hartley County, TX Non-Metro	16	0.01	8.05	0.00	10.71	12.50	18.09	6.25	63.15	81.25	15.15	0.00	16.67	0.00	18.18
Hill County, TX Non-Metro	183	0.10	18.98	0.63	17.35	8.18	22.08	16.98	41.58	74.21	25.00	0.00	25.00	31.03	24.46
Kerrville, TX Non-Metro	506	0.27	15.86	1.12	16.38	6.26	22.08	16.11	45.68	76.51	25.00	11.76	16.22	23.53	27.16
Killeen-Temple-Fort Hood, TX MSA	3,237	1.76	17.01	2.48	19.97	10.00	23.75	19.64	39.27	67.88	15.37	12.79	11.71	12.58	17.31
Laredo, TX MSA	630	0.34	22.96	1.08	16.89	5.41	18.19	12.12	41.96	81.39	21.43	28.57	33.33	24.00	20.26
Lubbock, TX MSA	2,242	1.22	21.02	2.80	17.88	8.87	20.74	19.18	40.36	69.15	21.77	20.00	20.75	22.57	21.80
McAllen-Edinburg-Mission, TX MSA	1,637	0.89	23.48	0.51	16.86	3.48	17.67	8.27	41.98	87.74	20.77	17.65	16.16	19.37	21.17
Midland, TX MSA	776	0.42	20.88	2.41	18.60	9.79	19.33	19.58	41.20	68.22	13.02	11.90	14.07	10.95	13.59
Montague County, TX Non-Metro	108	0.06	18.79	0.00	16.82	4.44	23.51	10.00	40.87	85.56	20.16	0.00	6.67	22.22	22.55
Odessa, TX MSA	524	0.28	21.22	1.15	17.50	8.78	21.98	22.17	39.30	67.90	13.46	16.67	6.85	13.64	14.53
Plainview, TX Non-Metro	143	0.08	19.60	1.59	20.54	11.90	22.27	14.29	37.60	72.22	23.81	0.00	29.73	13.89	26.85
San Angelo, TX MSA	846	0.46	19.37	4.08	18.37	14.08	22.73	20.70	39.53	61.13	20.45	34.38	23.65	17.09	20.23
San Antonio-New Braunfels, TX MSA	16,511	8.96	21.16	1.93	17.99	8.37	20.54	18.29	40.31	71.41	16.71	9.94	15.04	15.51	17.66
South TX Non-Metro	235	0.13	28.87	0.51	17.89	6.09	19.50	14.72	33.74	78.68	18.34	0.00	6.67	10.81	21.24
Southeastern TX Non-Metro	570	0.31	20.41	0.95	16.95	3.24	19.86	11.26	42.79	84.54	26.19	0.00	20.00	23.53	27.52
Victoria, TX MSA	749	0.41	21.10	1.26	17.47	8.16	20.57	17.43	40.86	73.16	28.23	25.00	20.00	22.54	31.33
Waco, TX MSA	1,474	0.80	20.68	2.18	17.54	8.79	21.36	19.18	40.42	69.85	19.32	13.64	13.76	18.66	20.64
Wichita Falls, TX MSA	893	0.48	18.22	3.18	19.08	9.98	23.92	21.33	38.78	65.51	15.46	10.67	16.79	16.61	15.27
Yoakum County, TX Non-Metro	27	0.01	21.57	0.00	18.07	5.56	19.84	5.56	40.52	88.89	18.52	0.00	33.33	0.00	25.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 18.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: TEXAS				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Austin-Round Rock-San Marcos, TX MSA	30,180	14.21	66.32	75.63	95.38	2.70	1.92	22.34	36.25	
Dallas-Plano-Irving, TX MD	31,686	14.92	66.93	74.35	94.66	3.17	2.17	10.84	18.98	
El Paso, TX MSA	8,979	4.23	63.44	79.64	95.72	2.31	1.97	24.66	42.16	
Fort Worth-Arlington, TX MD	22,738	10.71	67.66	76.49	95.57	2.63	1.80	18.39	30.94	
Houston-Sugar Land-Baytown, TX MSA	66,001	31.08	67.35	73.30	94.15	3.51	2.35	16.35	29.86	
<b>Limited Review:</b>										
Amarillo, TX MSA	2,128	1.00	68.12	75.23	91.49	4.61	3.90	6.92	14.51	
Atlanta, TX Non-Metro	49	0.02	69.63	55.10	81.63	14.29	4.08	8.61	14.77	
Beaumont-Port Arthur, TX MSA	2,814	1.33	67.35	65.03	88.17	6.18	5.65	14.46	21.72	
Big Spring, TX Non-Metro	228	0.11	66.40	64.04	92.54	7.02	0.44	14.85	18.37	
Borger, TX Non-Metro	172	0.08	62.10	52.91	92.44	2.33	5.23	23.19	24.11	
Brazos Valley, TX Non-Metro	977	0.46	70.57	78.51	98.16	1.13	0.72	23.64	41.40	
Brownsville-Harlingen, TX MSA	2,931	1.38	67.57	81.03	96.49	2.15	1.36	19.94	36.99	
Central TX Non-Metro	910	0.43	69.67	84.95	96.92	1.76	1.32	20.34	30.27	
College Station-Bryan, TX MSA	1,834	0.86	68.84	77.15	93.78	3.54	2.67	16.89	26.36	
Corpus Christi, TX MSA	2,983	1.40	65.11	76.13	94.40	3.52	2.08	15.29	25.72	
Garza County, TX Non-Metro	119	0.06	64.46	78.15	95.80	4.20	0.00	35.19	44.44	
Hartley County, TX Non-Metro	25	0.01	70.93	36.00	100.00	0.00	0.00	8.08	8.70	
Hill County, TX Non-Metro	341	0.16	67.62	80.35	93.84	3.23	2.93	29.82	46.62	
Kerrville, TX Non-Metro	1,607	0.76	72.07	75.05	92.78	4.48	2.74	40.45	53.07	
Killeen-Temple-Fort Hood, TX MSA	662	0.31	67.09	74.47	96.07	1.96	1.96	6.00	9.19	
Laredo, TX MSA	1,459	0.69	66.09	78.07	96.30	2.74	0.96	10.57	21.20	
Lubbock, TX MSA	2,182	1.03	62.12	77.22	95.23	2.89	1.88	11.66	19.00	
McAllen-Edinburg-Mission, TX MSA	2,682	1.26	68.17	75.65	97.02	1.53	1.45	9.16	16.92	
Midland, TX MSA	1,779	0.84	64.39	66.39	87.63	7.36	5.00	19.46	36.35	
Montague County, TX Non-Metro	198	0.09	74.11	86.36	99.49	0.51	0.00	21.69	41.59	
Odessa, TX MSA	508	0.24	67.52	67.72	92.32	4.13	3.54	7.20	17.68	
Plainview, TX Non-Metro	321	0.15	67.73	83.18	95.33	3.74	0.93	14.58	19.70	
San Angelo, TX MSA	1,056	0.50	65.63	71.40	94.41	3.31	2.27	24.90	38.78	
San Antonio-New Braunfels, TX MSA	16,947	7.98	67.62	75.31	94.42	3.18	2.40	15.66	28.34	
South TX Non-Metro	865	0.41	64.81	75.49	95.84	2.31	1.85	29.76	44.93	
Southeastern TX Non-Metro	2,086	0.98	69.08	78.57	94.87	3.88	1.25	32.06	49.01	
Victoria, TX MSA	1,898	0.89	66.73	65.81	86.62	7.43	5.95	23.13	35.64	
Waco, TX MSA	1,489	0.70	68.04	77.97	94.16	3.63	2.22	16.61	29.12	
Wichita Falls, TX MSA	1,479	0.70	70.21	75.19	88.91	5.27	5.81	27.10	49.26	
Yoakum County, TX Non-Metro	58	0.03	57.43	84.48	96.55	3.45	0.00	22.95	46.00	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 9.8% 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, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Austin-Round Rock-San Marcos, TX MSA	291	6.67	97.67	86.60	98.63	1.03	0.34	25.08	28.46
Dallas-Plano-Irving, TX MD	214	4.90	96.99	86.92	93.93	6.07	0.00	10.08	12.04
El Paso, TX MSA	55	1.26	95.97	100.00	100.00	0.00	0.00	58.62	80.95
Fort Worth-Arlington, TX MD	264	6.05	97.88	86.36	96.97	2.65	0.38	43.56	52.99
Houston-Sugar Land-Baytown, TX MSA	642	14.71	97.29	79.91	93.30	4.67	2.02	30.73	34.49
<b>Limited Review:</b>									
Amarillo, TX MSA	159	3.64	96.82	66.04	83.65	9.43	6.92	8.59	6.29
Atlanta, TX Non-Metro	4	0.09	97.46	0.00	100.00	0.00	0.00	0.00	0.00
Beaumont-Port Arthur, TX MSA	37	0.85	98.75	86.49	75.68	24.32	0.00	12.82	10.45
Big Spring, TX Non-Metro	49	1.12	98.82	81.63	51.02	24.49	24.49	33.33	50.00
Borger, TX Non-Metro	0	0.00	100.00	0.00	0.00	0.00	0.00	0.00	0.00
Brazos Valley, TX Non-Metro	112	2.57	99.13	76.79	95.54	3.57	0.89	18.07	19.23
Brownsville-Harlingen, TX MSA	75	1.72	97.08	94.67	100.00	0.00	0.00	38.98	44.68
Central TX Non-Metro	23	0.53	98.90	100.00	100.00	0.00	0.00	7.59	9.23
College Station-Bryan, TX MSA	73	1.67	97.59	94.52	95.89	4.11	0.00	12.25	17.69
Corpus Christi, TX MSA	113	2.59	97.77	80.53	84.07	8.85	7.08	21.19	29.47
Garza County, TX Non-Metro	48	1.10	96.55	81.25	58.33	22.92	18.75	100.00	100.00
Hartley County, TX Non-Metro	31	0.71	95.05	58.06	41.94	38.71	19.35	10.53	12.73
Hill County, TX Non-Metro	76	1.74	99.29	75.00	73.68	26.32	0.00	64.71	68.18
Kerrville, TX Non-Metro	42	0.96	98.08	90.48	95.24	0.00	4.76	37.84	41.94
Killeen-Temple-Fort Hood, TX MSA	30	0.69	98.71	80.00	66.67	26.67	6.67	3.27	3.13
Laredo, TX MSA	7	0.16	95.55	71.43	100.00	0.00	0.00	10.53	12.50
Lubbock, TX MSA	137	3.14	96.97	84.67	90.51	4.38	5.11	7.44	7.84
McAllen-Edinburg-Mission, TX MSA	19	0.44	93.51	73.68	100.00	0.00	0.00	5.19	7.69
Midland, TX MSA	29	0.66	98.70	58.62	65.52	24.14	10.34	23.08	23.08
Montague County, TX Non-Metro	14	0.32	98.62	92.86	100.00	0.00	0.00	27.78	26.67
Odessa, TX MSA	5	0.11	97.66	80.00	100.00	0.00	0.00	20.00	50.00
Plainview, TX Non-Metro	159	3.64	95.33	69.18	66.67	17.61	15.72	13.10	10.23
San Angelo, TX MSA	42	0.96	97.69	78.57	90.48	2.38	7.14	50.00	62.50
San Antonio-New Braunfels, TX MSA	493	11.30	97.85	87.02	91.48	5.88	2.64	38.91	50.00
South TX Non-Metro	49	1.12	93.79	91.84	81.63	2.04	16.33	39.47	60.00
Southeastern TX Non-Metro	749	17.16	98.63	90.92	94.39	4.14	1.47	33.10	38.82
Victoria, TX MSA	97	2.22	98.73	73.20	83.51	15.46	1.03	9.02	11.11
Waco, TX MSA	110	2.52	98.70	90.00	90.91	6.36	2.73	38.46	51.35
Wichita Falls, TX MSA	101	2.31	98.53	69.31	86.14	10.89	2.97	52.63	57.89
Yoakum County, TX Non-Metro	15	0.34	95.88	80.00	100.00	0.00	0.00	12.82	11.54

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 9.9% of small loans to farms originated and purchased by the bank.

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: TEXAS		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Austin-Round Rock-San Marcos, TX MSA	18	25,165	60	25,438	78	50,603	9.31	1	41
Dallas-Plano-Irving, TX MD	27	39,070	129	47,172	156	86,242	15.87	0	0
El Paso, TX MSA	8	26,228	17	6,703	25	32,931	6.06	0	0
Fort Worth-Arlington, TX MD	20	21,567	69	31,378	89	52,945	9.74	0	0
Houston-Sugar Land-Baytown, TX MSA	40	63,591	151	91,285	191	154,875	28.50	0	0
<b>Limited Review:</b>									
Amarillo, TX MSA	1	3,906	5	17	6	3,922	0.72	0	0
Atlanta, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
Beaumont-Port Arthur, TX MSA	5	12,102	10	9,814	15	21,916	4.03	0	0
Big Spring, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
Borger, TX Non-Metro	0	0	1	2	1	2	0.00	0	0
Brazos Valley,TX Non-Metro	0	0	4	40	4	40	0.01	0	0
Brownsville-Harlingen, TX MSA	1	300	3	13	4	313	0.06	0	0
Central TX Non-Metro	1	1,087	0	0	1	1,087	0.20	0	0
College Station-Bryan, TX MSA	2	1,259	12	5,869	14	7,129	1.31	0	0
Corpus Christi, TX MSA	1	878	2	6,681	3	7,560	1.39	0	0
Garza County, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
Hartley County, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
Hill County, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
Kerrville, TX Non-Metro	0	0	4	16	4	16	0.00	0	0
Killeen-Temple-Fort Hood, TX MSA	0	0	0	0	0	0	0.00	0	0
Laredo, TX MSA	1	4,465	7	18	8	4,483	0.83	0	0
Lubbock, TX MSA	1	260	1	3	2	263	0.05	0	0
McAllen-Edinburg-Mission, TX MSA	6	11,885	11	20,039	17	31,924	5.88	0	0
Midland, TX MSA	0	0	0	0	0	0	0.00	0	0
Montague County, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
Odessa, TX MSA	1	2	1	1,012	2	1,014	0.19	0	0
Plainview, TX Non-Metro	0	0	2	5	2	5	0.00	0	0
San Angelo, TX MSA	2	3,773	4	838	6	4,611	0.85	0	0
San Antonio-New Braunfels, TX MSA	17	12,887	34	46,947	51	59,834	11.01	1	187
South TX Non-Metro	2	3,671	1	0	3	3,671	0.68	0	0
Southeastern TX Non-Metro	1	160	3	4	4	164	0.03	0	0
Victoria, TX MSA	1	2,390	3	16	4	2,406	0.44	0	0
Waco, TX MSA	2	2,127	2	1	4	2,128	0.39	0	0
Wichita Falls, TX MSA	0	0	2	16	2	16	0.00	0	0
Yoakum County, TX Non-Metro	0	0	0	0	0	0	0.00	0	0
<b>Statewide:</b>									
Texas Statewide	9	16,337	2	5,167	11	21,503	2.44	3	7,841

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: TEXAS		Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Austin-Round Rock-San Marcos, TX	10.84	72	10.79	11.11	16.67	36.11	36.11	2	14	0	-3	-3	-6	10.74	23.88	34.83	30.41
Dallas-Plano-Irving, TX MD	19.18	119	17.84	9.24	17.65	26.05	47.06	1	37	-4	-2	-7	-23	11.50	24.54	28.35	35.60
El Paso, TX MSA	3.71	14	2.10	14.29	28.57	14.29	42.86	0	0	0	0	0	0	3.86	32.18	32.26	31.70
Fort Worth-Arlington, TX MD	9.12	69	10.34	7.25	30.43	34.78	27.54	1	18	0	-7	-4	-6	6.33	25.31	39.51	28.85
Houston-Sugar Land-Baytown, TX	32.59	205	30.73	6.34	20.00	22.44	51.22	1	32	-4	-1	-4	-22	9.49	26.27	29.16	34.74
Limited Review:																	
Amarillo, TX MSA	0.59	6	0.90	33.33	0.00	33.33	33.33	0	1	0	0	0	-1	11.48	18.66	40.59	29.27
Atlanta, TX Non-Metro	0.05	1	0.15	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.15	81.59	9.26
Beaumont-Port Arthur, TX MSA	1.23	12	1.80	0.00	0.00	41.67	58.33	1	2	0	0	-1	0	4.85	23.04	39.33	30.64
Big Spring, TX Non-Metro	0.22	1	0.15	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	25.12	58.24	16.63
Borger, TX Non-Metro	0.06	1	0.15	0.00	100.00	0.00	0.00	0	1	0	0	-1	0	3.87	8.22	58.89	29.01
Brazos Valley, TX Non-Metro	0.48	8	1.20	0.00	0.00	75.00	25.00	0	1	0	0	0	-1	0.00	11.58	51.33	34.44
Brownsville-Harlingen, TX MSA	1.66	12	1.80	0.00	33.33	50.00	16.67	0	0	0	0	0	0	1.86	28.20	47.90	22.03
Central TX Non-Metro	0.17	2	0.30	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.84	42.51	47.65
College Station-Bryan, TX MSA	1.18	7	1.05	14.29	14.29	42.86	28.57	0	0	0	0	0	0	12.46	26.98	30.87	25.76
Corpus Christi, TX MSA	1.25	13	1.95	23.08	7.69	61.54	7.69	0	0	0	0	0	0	9.61	22.11	40.27	27.72
Garza County, TX Non-Metro	0.15	1	0.15	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00
Hartley County, TX Non-Metro	0.02	1	0.15	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	0.00	0.00	100.00
Hill County, TX Non-Metro	0.11	3	0.45	0.00	33.33	33.33	33.33	0	0	0	0	0	0	0.00	12.05	50.73	37.22
Kerrville, TX Non-Metro	0.54	3	0.45	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	3.67	71.16	25.17
Killeen-Temple-Fort Hood, TX MSA	0.23	1	0.15	0.00	0.00	100.00	0.00	0	0	0	0	0	0	2.11	17.37	59.40	20.46
Laredo, TX MSA	0.55	4	0.60	0.00	25.00	50.00	25.00	0	0	0	0	0	0	2.36	30.71	38.44	28.49
Lubbock, TX MSA	1.01	11	1.65	18.18	9.09	45.45	27.27	0	1	0	0	-1	0	7.42	25.94	33.12	33.53
McAllen-Edinburg-Mission, TX MSA	0.71	6	0.90	0.00	16.67	33.33	50.00	0	0	0	0	0	0	0.68	32.44	41.25	25.24
Midland, TX MSA	2.01	5	0.75	0.00	40.00	40.00	20.00	0	0	0	0	0	0	6.16	16.04	49.10	28.71
Montague County, TX Non-Metro	0.10	1	0.15	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	74.10	25.90
Odessa, TX MSA	0.39	1	0.15	0.00	0.00	0.00	100.00	0	0	0	0	0	0	0.00	23.50	46.83	29.68
Plainview, TX Non-Metro	0.26	2	0.30	0.00	0.00	100.00	0.00	0	1	0	0	0	-1	0.00	35.68	32.15	32.17
San Angelo, TX MSA	0.94	4	0.60	75.00	0.00	0.00	25.00	0	0	0	0	0	0	2.32	29.98	42.54	25.16
San Antonio-New Braunfels, TX	6.12	51	7.65	3.92	23.53	39.22	33.33	0	9	-1	-2	-5	-1	6.40	28.05	34.05	31.49
South TX Non-Metro	0.66	5	0.75	20.00	20.00	40.00	20.00	0	1	0	0	0	-1	8.25	43.42	35.02	13.31
Southeastern TX Non-Metro	0.95	9	1.35	0.00	0.00	77.78	22.22	0	2	0	-1	-1	0	0.00	10.67	58.27	31.06
Victoria, TX MSA	1.14	5	0.75	0.00	20.00	60.00	20.00	0	1	0	0	-1	0	3.78	20.87	53.62	21.73
Waco, TX MSA	0.95	4	0.60	0.00	50.00	50.00	0.00	0	0	0	0	0	0	12.16	19.18	29.24	37.62
Wichita Falls, TX MSA	0.78	7	1.05	0.00	14.29	42.86	42.86	0	0	0	0	0	0	2.55	19.44	43.60	34.41
Yoakum County, TX Non-Metro	0.06	1	0.15	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	100.00	0.00

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: UTAH												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Salt Lake City, UT MSA	46.20	44,924	10,034,393	26,863	1,036,922	187	5,776	42	144,367	72,016	11,221,458	64.76
Limited Review:												
Brigham City, UT Non-Metro	1.58	1,608	259,784	651	21,978	198	13,888	1	3,909	2,458	299,559	0.83
Greater UT Non-Metro	7.02	5,944	1,022,060	4,603	155,971	394	18,822	4	17,570	10,945	1,214,423	6.00
Ogden-Clearfield, UT MSA	21.02	23,657	4,623,500	9,019	363,574	78	3,663	4	3,200	32,758	4,993,937	10.88
Provo-Orem, UT MSA	18.62	19,212	3,826,864	9,677	327,746	130	6,513	6	10,364	29,025	4,171,486	13.39
St. George, UT MSA	5.56	4,934	924,276	3,690	134,329	39	1,439	1	500	8,664	1,060,544	4.14

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: UTAH								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Salt Lake City, UT MSA	14,159	43.00	0.20	0.95	16.53	14.78	52.75	55.68	30.52	28.58	20.60	26.36	19.25	20.31	21.73	
Limited Review:																
Brigham City, UT Non-Metro	502	1.52	0.00	0.00	0.00	0.00	59.23	62.15	40.77	37.85	16.03	0.00	0.00	13.76	19.93	
Greater UT Non-Metro	1,961	5.96	2.75	0.00	7.96	8.82	81.68	82.76	7.61	8.41	15.26	0.00	15.78	15.30	14.43	
Ogden-Clearfield, UT MSA	7,627	23.16	0.84	1.57	13.51	14.95	59.46	62.82	26.19	20.66	20.38	21.25	22.72	20.28	19.38	
Provo-Orem, UT MSA	6,562	19.93	1.40	1.46	10.97	7.94	54.53	59.65	33.10	30.95	18.74	15.29	19.93	19.12	17.97	
St. George, UT MSA	2,117	6.43	0.00	0.00	9.35	10.01	71.27	70.05	19.38	19.93	21.32	0.00	21.45	22.49	17.78	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: UTAH				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA	1,079	46.37	0.20	0.37	16.53	12.70	52.75	53.10	30.52	33.83	20.56	50.00	25.47	19.83	19.89
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	46	1.98	0.00	0.00	0.00	0.00	59.23	63.04	40.77	36.96	26.32	0.00	0.00	34.48	17.86
Greater UT Non-Metro	259	11.13	2.75	0.77	7.96	5.41	81.68	87.26	7.61	6.56	17.99	0.00	16.67	17.86	20.00
Ogden-Clearfield, UT MSA	484	20.80	0.84	1.03	13.51	9.92	59.46	58.68	26.19	30.37	10.12	66.67	14.04	8.53	11.71
Provo-Orem, UT MSA	366	15.73	1.40	0.27	10.97	6.28	54.53	55.19	33.10	38.25	15.77	0.00	7.14	14.97	18.32
St. George, UT MSA	93	4.00	0.00	0.00	9.35	4.30	71.27	70.97	19.38	24.73	27.91	0.00	0.00	35.29	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: UTAH				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA	29,652	45.64	0.20	0.24	16.53	11.58	52.75	54.69	30.52	33.49	20.25	19.44	21.79	20.60	19.30
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	1,060	1.63	0.00	0.00	0.00	0.00	59.23	57.55	40.77	42.45	16.11	0.00	0.00	15.51	16.92
Greater UT Non-Metro	3,723	5.73	2.75	0.00	7.96	6.07	81.68	83.59	7.61	10.34	15.65	0.00	13.33	16.26	13.32
Ogden-Clearfield, UT MSA	15,537	23.92	0.84	0.56	13.51	8.39	59.46	63.93	26.19	27.12	18.16	17.78	21.25	18.37	16.89
Provo-Orem, UT MSA	12,271	18.89	1.40	0.89	10.97	6.44	54.53	54.36	33.10	38.31	18.78	15.52	20.32	20.13	16.86
St. George, UT MSA	2,724	4.19	0.00	0.00	9.35	8.00	71.27	67.91	19.38	24.08	20.47	0.00	20.00	22.11	16.05

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: UTAH						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA	34	59.65	3.14	2.94	49.56	50.00	36.55	29.41	10.76	17.65	37.21	0.00	34.62	33.33	75.00
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	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
Greater UT Non-Metro	1	1.75	0.81	0.00	12.24	0.00	81.34	100.00	5.61	0.00	50.00	0.00	0.00	50.00	0.00
Ogden-Clearfield, UT MSA	9	15.79	10.09	22.22	37.76	33.33	43.01	33.33	9.14	11.11	11.11	0.00	0.00	20.00	0.00
Provo-Orem, UT MSA	13	22.81	37.41	53.85	29.69	7.69	28.80	38.46	4.10	0.00	41.67	37.50	33.33	100.00	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

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: UTAH				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	26,863	49.29	5.35	5.77	17.51	18.97	42.21	37.07	34.93	38.19	26.45	28.66	23.04	25.08	30.26
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	651	1.19	0.00	0.00	0.00	0.00	61.01	61.44	38.99	38.56	27.97	0.00	0.00	28.07	30.45
Greater UT Non-Metro	4,603	8.45	0.37	0.11	10.05	9.19	79.66	82.34	9.91	8.36	28.95	42.11	35.44	30.57	23.17
Ogden-Clearfield, UT MSA	9,019	16.55	3.62	4.42	13.55	13.45	54.21	48.92	28.62	33.21	26.32	25.99	29.46	24.01	30.29
Provo-Orem, UT MSA	9,677	17.76	2.59	1.99	9.86	9.65	49.37	48.86	38.17	39.50	24.52	19.13	22.20	24.42	26.72
St. George, UT MSA	3,690	6.77	0.00	0.00	10.35	11.71	69.32	66.56	20.32	21.73	27.56	0.00	25.90	28.26	29.26

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: UTAH						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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	187	18.23	2.36	5.88	14.13	10.16	48.63	43.85	34.88	40.11	60.00	100.00	75.00	52.83	61.54
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	198	19.30	0.00	0.00	0.00	0.00	61.44	71.72	38.56	28.28	48.04	0.00	0.00	57.89	38.10
Greater UT Non-Metro	394	38.40	0.08	0.00	8.07	12.44	84.27	87.06	7.58	0.51	33.33	0.00	33.33	34.41	0.00
Ogden-Clearfield, UT MSA	78	7.60	2.41	0.00	10.05	12.82	61.96	56.41	25.58	30.77	45.24	0.00	100.00	39.29	50.00
Provo-Orem, UT MSA	130	12.67	0.82	0.77	7.01	2.31	59.65	62.31	32.51	34.62	37.76	0.00	0.00	34.38	51.72
St. George, UT MSA	39	3.80	0.00	0.00	4.68	0.00	74.24	51.28	21.08	48.72	60.00	0.00	0.00	53.85	83.33

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE		Geography: UTAH						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA	14,159	43.00	16.76	9.92	19.97	27.70	24.84	27.35	38.44	35.04	21.60	20.45	20.08	22.65	22.95
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	502	1.52	10.34	4.33	15.56	20.62	24.42	35.88	49.68	39.18	16.28	9.30	12.96	16.44	24.28
Greater UT Non-Metro	1,961	5.96	19.72	3.91	19.68	18.43	24.33	27.40	36.27	50.26	15.81	11.22	12.12	15.34	20.43
Ogden-Clearfield, UT MSA	7,627	23.16	15.92	12.59	20.34	32.23	25.67	28.71	38.07	26.47	20.81	19.54	21.01	20.84	21.54
Provo-Orem, UT MSA	6,562	19.93	17.85	8.40	19.45	31.15	24.56	29.88	38.14	30.57	20.42	19.27	21.52	19.77	20.33
St. George, UT MSA	2,117	6.43	16.37	5.70	19.57	20.96	25.69	24.32	38.37	49.03	23.19	22.88	24.49	22.07	23.09

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: UTAH						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA	1,079	46.37	16.76	6.91	19.97	21.95	24.84	28.19	38.44	42.95	20.42	18.39	16.23	20.94	22.87
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	46	1.98	10.34	0.00	15.56	18.60	24.42	39.53	49.68	41.86	23.64	0.00	14.29	18.75	31.03
Greater UT Non-Metro	259	11.13	19.72	6.75	19.68	19.84	24.33	32.54	36.27	40.87	18.02	0.00	16.67	27.27	14.85
Ogden-Clearfield, UT MSA	484	20.80	15.92	8.12	20.34	21.15	25.67	29.27	38.07	41.45	9.62	11.39	12.03	9.05	8.11
Provo-Orem, UT MSA	366	15.73	17.85	5.54	19.45	18.28	24.56	32.41	38.14	43.77	16.14	22.22	20.29	15.66	13.14
St. George, UT MSA	93	4.00	16.37	5.38	19.57	17.20	25.69	23.66	38.37	53.76	27.91	33.33	30.00	38.46	17.65

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: UTAH						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Salt Lake City, UT MSA	29,652	45.64	16.76	5.08	19.97	20.21	24.84	28.83	38.44	45.88	20.34	16.91	19.07	19.83	21.84
<b>Limited Review:</b>															
Brigham City, UT Non-Metro	1,060	1.63	10.34	4.02	15.56	15.27	24.42	29.16	49.68	51.55	16.11	13.79	16.67	16.84	15.58
Greater UT Non-Metro	3,723	5.73	19.72	3.31	19.68	13.04	24.33	27.59	36.27	56.06	16.85	13.23	18.10	15.81	17.48
Ogden-Clearfield, UT MSA	15,537	23.92	15.92	5.25	20.34	20.13	25.67	32.96	38.07	41.66	17.08	15.12	16.43	16.36	18.32
Provo-Orem, UT MSA	12,271	18.89	17.85	4.02	19.45	18.04	24.56	31.26	38.14	46.68	19.51	18.09	20.13	20.18	19.05
St. George, UT MSA	2,724	4.19	16.37	2.60	19.57	15.36	25.69	26.32	38.37	55.72	23.09	13.33	24.66	24.52	22.82

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 20.3% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: UTAH			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Salt Lake City, UT MSA	26,863	49.29	70.32	71.82	95.25	2.52	2.23	26.45	44.22
<b>Limited Review:</b>									
Brigham City, UT Non-Metro	651	1.19	72.32	72.66	95.24	2.15	2.61	27.97	46.57
Greater UT Non-Metro	4,603	8.45	67.40	70.22	96.20	2.35	1.46	28.95	45.07
Ogden-Clearfield, UT MSA	9,019	16.55	72.23	71.06	94.71	2.78	2.51	26.32	41.06
Provo-Orem, UT MSA	9,677	17.76	72.18	74.55	96.00	2.24	1.76	24.52	39.45
St. George, UT MSA	3,690	6.77	71.38	73.25	95.93	2.22	1.84	27.56	44.84

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.4% of small loans to businesses originated and purchased by the bank.

**Table 12. Borrower Distribution of Small Loans to Farms**

Table 12: Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS				Geography: UTAH			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
Salt Lake City, UT MSA	187	18.23	96.67	82.89	94.65	4.81	0.53	60.00	59.46
Limited Review:									
Brigham City, UT Non-Metro	198	19.30	96.81	84.34	82.83	13.13	4.04	48.04	46.99
Greater UT Non-Metro	394	38.40	97.69	72.84	89.34	8.63	2.03	33.33	29.17
Ogden-Clearfield, UT MSA	78	7.60	97.92	89.74	92.31	2.56	5.13	45.24	55.17
Provo-Orem, UT MSA	130	12.67	97.18	79.23	93.08	0.77	6.15	37.76	42.65
St. George, UT MSA	39	3.80	97.89	97.44	97.44	2.56	0.00	60.00	63.16

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 10.7% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: UTAH		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Salt Lake City, UT MSA	24	17,923	103	24,681	127	42,604	56.73	2	669
<b>Limited Review:</b>									
Brigham City, UT Non-Metro	0	0	2	8,320	2	8,320	11.08	0	0
Greater UT Non-Metro	4	2,623	4	8,567	8	11,191	14.90	0	0
Ogden-Clearfield, UT MSA	1	208	6	11,108	7	11,317	15.07	0	0
Provo-Orem, UT MSA	0	0	24	227	24	227	0.30	0	0
St. George, UT MSA	2	915	5	32	7	947	1.26	0	0
<b>Statewide:</b>									
Utah Statewide	0	0	1	500	1	500	0.67	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: UTAH																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Salt Lake City, UT MSA	64.76	43	37.07	6.98	23.26	41.86	27.91	0	7	0	-2	-4	-1	4.28	17.28	50.31	27.78
Limited Review:																	
Brigham City, UT Non-Metro	0.83	2	1.72	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	0.00	86.26	13.74
Greater UT Non-Metro	6.00	21	18.10	0.00	19.05	76.19	4.76	0	0	0	0	0	0	0.00	16.76	71.92	11.33
Ogden-Clearfield, UT MSA	10.88	24	20.69	0.00	50.00	37.50	12.50	0	1	0	-1	0	0	2.61	21.12	52.22	24.04
Provo-Orem, UT MSA	13.39	19	16.38	5.26	47.37	42.11	5.26	0	3	0	-3	0	0	6.56	15.68	51.79	25.96
St. George, UT MSA	4.14	7	6.03	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	2.44	83.57	13.98

**Table 1. Lending Volume**

LENDING VOLUME		Geography: VIRGINIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Richmond, VA MSA	31.13	19,850	4,076,899	5,140	282,729	25	881	10	111,855	25,025	4,472,365	35.04
Virginia Beach-Norfolk-Newport News, VA MSA	40.69	28,513	6,309,139	4,180	169,362	19	953	3	35,107	32,715	6,514,561	26.15
Limited Review:												
Blacksburg-Christiansburg-Radford, VA MSA	2.02	1,416	230,191	199	8,117	7	110	0	0	1,622	238,417	2.09
Charlottesville, VA MSA	3.64	2,328	537,345	592	23,672	3	41	2	994	2,925	562,051	4.32
Danville, VA MSA	0.91	618	84,687	108	4,428	7	234	2	4,905	735	94,254	0.33
Harrisonburg, VA MSA	1.62	1,053	185,064	228	13,441	21	941	0	0	1,302	199,446	2.17
Kingsport-Bristol-Bristol, VA MSA	0.81	515	76,153	138	6,319	1	50	0	0	654	82,522	2.05
Lynchburg, VA MSA	4.49	2,877	460,656	719	43,693	14	564	1	1,000	3,611	505,913	5.95
Martinsville-Henry County, VA Non-Metro	0.36	244	29,951	43	1,275	0	0	0	0	287	31,226	0.27
Northern VA Non-Metro	2.26	1,441	281,858	368	12,906	5	185	0	0	1,814	294,949	2.13
Northwestern VA Non-Metro	2.10	1,478	241,862	203	9,077	8	253	0	0	1,689	251,192	1.02
Prince Edward County, VA Non-Metro	0.16	82	13,177	47	3,891	0	0	2	1,100	131	18,168	0.35
Roanoke, VA MSA	5.00	3,323	573,167	690	36,579	2	20	2	1,030	4,017	610,796	12.20
Southside VA Non-Metro	0.62	356	51,284	132	5,302	9	875	0	0	497	57,461	0.97
Western VA Non-Metro	1.25	709	82,574	292	12,913	5	195	0	0	1,006	95,683	2.65
Winchester, VA MSA	2.94	2,016	380,990	336	32,780	10	100	0	0	2,362	413,869	2.31

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	7,940	30.57	2.89	1.79	17.41	13.21	47.12	45.23	32.58	39.77	25.00	26.28	23.85	25.03	25.31
Virginia Beach-Norfolk-Newport News, VA MSA	11,584	44.59	1.82	1.65	15.61	15.35	44.99	45.99	37.58	37.02	26.21	21.98	26.57	27.64	24.67
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	461	1.77	0.00	0.00	4.88	2.17	86.82	87.20	8.30	10.63	15.92	0.00	25.00	16.04	13.17
Charlottesville, VA MSA	736	2.83	1.07	1.90	11.96	8.56	63.77	66.17	23.21	23.37	15.93	18.18	17.98	15.89	15.22
Danville, VA MSA	273	1.05	0.00	0.00	12.48	7.33	76.30	72.53	11.22	20.15	17.48	0.00	14.75	17.44	18.84
Harrisonburg, VA MSA	322	1.24	0.00	0.00	9.44	8.70	76.87	67.39	13.68	23.91	15.69	0.00	16.33	15.36	16.53
Kingsport-Bristol-Bristol, VA MSA	187	0.72	0.00	0.00	19.54	9.09	75.35	79.68	5.12	11.23	15.28	0.00	10.77	15.68	16.42
Lynchburg, VA MSA	922	3.55	0.99	0.43	9.45	7.16	68.72	59.76	20.84	32.65	18.82	15.00	20.21	18.94	18.39
Martinsville-Henry County, VA Non-Metro	81	0.31	0.00	0.00	10.04	4.94	84.82	81.48	5.14	13.58	12.05	0.00	7.41	11.08	27.59
Northern VA Non-Metro	611	2.35	0.00	0.00	0.00	0.00	42.51	31.91	57.49	68.09	24.93	0.00	0.00	26.54	24.17
Northwestern VA Non-Metro	459	1.77	0.00	0.00	4.25	4.14	44.57	38.13	51.18	57.73	16.30	0.00	10.81	16.59	16.72
Prince Edward County, VA Non-Metro	31	0.12	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.18	0.00	0.00	15.18	0.00
Roanoke, VA MSA	1,217	4.68	2.02	1.15	9.99	9.53	57.64	53.90	30.35	35.41	18.42	22.22	20.86	17.83	18.62
Southside VA Non-Metro	119	0.46	0.00	0.00	4.80	4.20	95.20	95.80	0.00	0.00	22.40	0.00	11.11	22.69	0.00
Western VA Non-Metro	231	0.89	0.00	0.00	28.04	19.91	71.96	80.09	0.00	0.00	11.07	0.00	9.03	11.73	0.00
Winchester, VA MSA	803	3.09	0.00	0.00	8.05	7.85	74.04	78.21	17.91	13.95	24.93	0.00	29.92	24.61	24.24

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	473	26.12	2.89	2.11	17.41	12.26	47.12	50.95	32.58	34.67	17.37	22.22	11.53	19.07	18.52
Virginia Beach-Norfolk-Newport News, VA MSA	706	38.98	1.82	1.27	15.61	11.19	44.99	43.77	37.58	43.77	14.75	14.29	11.94	14.75	15.93
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	45	2.48	0.00	0.00	4.88	8.89	86.82	77.78	8.30	13.33	5.90	0.00	16.67	4.98	10.34
Charlottesville, VA MSA	49	2.71	1.07	0.00	11.96	18.37	63.77	51.02	23.21	30.61	6.79	0.00	13.21	4.18	13.89
Danville, VA MSA	20	1.10	0.00	0.00	12.48	0.00	76.30	80.00	11.22	20.00	9.40	0.00	0.00	9.89	13.33
Harrisonburg, VA MSA	28	1.55	0.00	0.00	9.44	10.71	76.87	78.57	13.68	10.71	9.63	0.00	6.25	9.62	13.33
Kingsport-Bristol-Bristol, VA MSA	14	0.77	0.00	0.00	19.54	14.29	75.35	85.71	5.12	0.00	4.85	0.00	8.70	4.68	0.00
Lynchburg, VA MSA	113	6.24	0.99	1.77	9.45	5.31	68.72	61.95	20.84	30.97	13.65	33.33	6.98	12.54	21.05
Martinsville-Henry County, VA Non-Metro	13	0.72	0.00	0.00	10.04	7.69	84.82	69.23	5.14	23.08	8.04	0.00	8.33	6.32	40.00
Northern VA Non-Metro	39	2.15	0.00	0.00	0.00	0.00	42.51	46.15	57.49	53.85	14.78	0.00	0.00	13.33	16.36
Northwestern VA Non-Metro	66	3.64	0.00	0.00	4.25	3.03	44.57	53.03	51.18	43.94	13.52	0.00	12.50	16.67	10.64
Prince Edward County, VA Non-Metro	8	0.44	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	13.89	0.00	0.00	13.89	0.00
Roanoke, VA MSA	115	6.35	2.02	1.74	9.99	8.70	57.64	51.30	30.35	38.26	7.67	7.41	6.49	6.35	11.63
Southside VA Non-Metro	27	1.49	0.00	0.00	4.80	7.41	95.20	92.59	0.00	0.00	24.10	0.00	33.33	23.75	0.00
Western VA Non-Metro	61	3.37	0.00	0.00	28.04	47.54	71.96	52.46	0.00	0.00	5.04	0.00	5.42	4.79	0.00
Winchester, VA MSA	34	1.88	0.00	0.00	8.05	11.76	74.04	61.76	17.91	26.47	11.43	0.00	40.00	8.33	18.75

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	11,432	29.31	2.89	0.92	17.41	9.36	47.12	40.45	32.58	49.27	20.46	20.89	20.32	20.60	20.36
Virginia Beach-Norfolk-Newport News, VA MSA	16,211	41.56	1.82	1.19	15.61	10.36	44.99	40.82	37.58	47.63	22.45	25.74	22.77	22.40	22.33
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	910	2.33	0.00	0.00	4.88	1.43	86.82	84.84	8.30	13.74	16.76	0.00	10.14	16.82	17.75
Charlottesville, VA MSA	1,543	3.96	1.07	0.84	11.96	7.19	63.77	64.36	23.21	27.61	16.14	10.81	15.08	16.23	16.53
Danville, VA MSA	324	0.83	0.00	0.00	12.48	3.40	76.30	76.54	11.22	20.06	17.33	0.00	14.00	17.40	17.93
Harrisonburg, VA MSA	701	1.80	0.00	0.00	9.44	10.13	76.87	62.20	13.68	27.67	17.62	0.00	21.08	15.68	22.98
Kingsport-Bristol-Bristol, VA MSA	314	0.81	0.00	0.00	19.54	6.05	75.35	83.44	5.12	10.51	14.50	0.00	11.22	15.20	12.17
Lynchburg, VA MSA	1,842	4.72	0.99	0.43	9.45	5.65	68.72	57.93	20.84	35.99	19.09	25.93	20.41	19.28	18.36
Martinsville-Henry County, VA Non-Metro	150	0.38	0.00	0.00	10.04	2.67	84.82	84.67	5.14	12.67	14.80	0.00	12.90	14.51	18.52
Northern VA Non-Metro	791	2.03	0.00	0.00	0.00	0.00	42.51	31.10	57.49	68.90	21.60	0.00	0.00	21.11	21.84
Northwestern VA Non-Metro	952	2.44	0.00	0.00	4.25	3.78	44.57	32.88	51.18	63.34	15.00	0.00	13.76	13.73	15.82
Prince Edward County, VA Non-Metro	43	0.11	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	10.14	0.00	0.00	10.14	0.00
Roanoke, VA MSA	1,988	5.10	2.02	0.75	9.99	4.48	57.64	50.60	30.35	44.16	16.77	22.92	17.77	16.18	17.26
Southside VA Non-Metro	210	0.54	0.00	0.00	4.80	1.43	95.20	98.57	0.00	0.00	16.11	0.00	6.67	16.30	0.00
Western VA Non-Metro	417	1.07	0.00	0.00	28.04	15.35	71.96	84.65	0.00	0.00	12.89	0.00	10.00	13.55	0.00
Winchester, VA MSA	1,179	3.02	0.00	0.00	8.05	4.07	74.04	75.57	17.91	20.36	28.23	0.00	25.51	29.24	25.33

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	5	21.74	13.52	60.00	29.71	20.00	38.24	0.00	18.52	20.00	7.69	7.14	9.09	0.00	25.00
Virginia Beach-Norfolk-Newport News, VA MSA	12	52.17	8.90	0.00	36.06	16.67	38.35	33.33	16.69	50.00	9.26	0.00	6.25	14.29	7.69
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	0	0.00	0.00	0.00	0.34	0.00	88.83	0.00	10.83	0.00	0.00	0.00	0.00	0.00	0.00
Charlottesville, VA MSA	0	0.00	3.26	0.00	35.97	0.00	50.73	0.00	10.04	0.00	0.00	0.00	0.00	0.00	0.00
Danville, VA MSA	1	4.35	0.00	0.00	35.90	0.00	54.29	100.00	9.81	0.00	0.00	0.00	0.00	0.00	0.00
Harrisonburg, VA MSA	2	8.70	0.00	0.00	36.27	0.00	46.60	0.00	17.13	100.00	9.09	0.00	0.00	0.00	33.33
Kingsport-Bristol-Bristol, VA MSA	0	0.00	0.00	0.00	18.02	0.00	78.76	0.00	3.22	0.00	0.00	0.00	0.00	0.00	0.00
Lynchburg, VA MSA	0	0.00	3.71	0.00	14.35	0.00	60.43	0.00	21.50	0.00	0.00	0.00	0.00	0.00	0.00
Martinsville-Henry County, VA Non-Metro	0	0.00	0.00	0.00	15.13	0.00	79.94	0.00	4.92	0.00	0.00	0.00	0.00	0.00	0.00
Northern VA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	53.90	0.00	46.10	0.00	0.00	0.00	0.00	0.00	0.00
Northwestern VA Non-Metro	1	4.35	0.00	0.00	9.43	0.00	42.88	0.00	47.69	100.00	0.00	0.00	0.00	0.00	0.00
Prince Edward County, VA Non-Metro	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
Roanoke, VA MSA	2	8.70	8.62	0.00	17.47	0.00	57.44	100.00	16.47	0.00	5.00	0.00	0.00	11.11	0.00
Southside VA Non-Metro	0	0.00	0.00	0.00	0.53	0.00	99.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Western VA Non-Metro	0	0.00	0.00	0.00	32.99	0.00	67.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Winchester, VA MSA	0	0.00	0.00	0.00	25.92	0.00	52.27	0.00	21.82	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Richmond, VA MSA	5,138	38.33	7.26	6.21	16.08	12.51	41.60	37.66	35.01	43.62	19.97	18.66	17.63	19.41	22.33
Virginia Beach-Norfolk-Newport News, VA MSA	4,174	31.14	2.39	1.82	19.36	18.09	40.88	35.79	37.14	44.30	14.28	12.72	13.61	13.60	15.95
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	197	1.47	0.00	0.00	2.10	0.51	88.58	84.77	8.56	14.72	10.69	0.00	2.70	10.87	16.67
Charlottesville, VA MSA	592	4.42	0.87	1.35	11.17	12.67	60.46	56.93	27.50	29.05	15.17	16.13	14.77	16.56	14.10
Danville, VA MSA	108	0.81	0.00	0.00	17.01	9.26	71.70	66.67	11.29	24.07	7.11	0.00	3.97	7.03	10.88
Harrisonburg, VA MSA	228	1.70	0.00	0.00	12.35	8.33	61.99	60.96	25.66	30.70	9.47	0.00	5.49	11.22	8.53
Kingsport-Bristol-Bristol, VA MSA	138	1.03	0.00	0.00	13.05	13.04	80.13	76.09	6.83	10.87	8.00	0.00	8.66	8.19	7.97
Lynchburg, VA MSA	719	5.36	3.53	1.25	10.28	10.01	62.15	55.77	24.04	32.96	19.68	5.41	16.78	21.18	21.82
Martinsville-Henry County, VA Non-Metro	43	0.32	0.00	0.00	12.38	25.58	83.76	74.42	3.86	0.00	4.20	0.00	7.46	4.16	0.00
Northern VA Non-Metro	368	2.75	0.00	0.00	0.00	0.00	43.66	55.98	56.34	44.02	19.87	0.00	0.00	25.36	16.69
Northwestern VA Non-Metro	203	1.51	0.00	0.00	3.78	5.91	44.12	43.35	52.10	50.74	7.79	0.00	8.00	8.53	7.79
Prince Edward County, VA Non-Metro	47	0.35	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.53	0.00	0.00	16.92	0.00
Roanoke, VA MSA	690	5.15	2.61	3.33	11.96	17.10	55.37	51.45	30.00	28.12	13.19	10.28	15.29	13.57	12.93
Southside VA Non-Metro	132	0.98	0.00	0.00	2.56	3.79	97.44	96.21	0.00	0.00	19.88	0.00	25.00	20.40	0.00
Western VA Non-Metro	292	2.18	0.00	0.00	26.21	20.55	73.79	79.45	0.00	0.00	13.21	0.00	14.88	14.11	0.00
Winchester, VA MSA	336	2.51	0.00	0.00	11.97	14.58	64.39	60.71	23.64	24.70	14.28	0.00	16.77	15.02	12.87

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms															
Geography: VIRGINIA															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% of Farms***	% BANK Loans****	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	% of Farms***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Richmond, VA MSA	25	18.38	1.91	0.00	18.03	12.00	49.88	36.00	30.17	52.00	18.03	0.00	5.56	12.90	54.55
Virginia Beach-Norfolk-Newport News, VA MSA	19	13.97	1.23	0.00	14.20	5.26	47.05	63.16	37.36	31.58	18.06	100.00	33.33	9.26	50.00
Limited Review:															
Blacksburg-Christiansburg-Radford, VA MSA	7	5.15	0.00	0.00	2.39	0.00	89.89	57.14	7.71	42.86	7.69	0.00	0.00	5.88	25.00
Charlottesville, VA MSA	3	2.21	0.40	0.00	10.38	33.33	65.81	66.67	23.42	0.00	10.71	0.00	11.11	16.67	0.00
Danville, VA MSA	7	5.15	0.00	0.00	3.15	0.00	90.80	100.00	6.05	0.00	8.70	0.00	0.00	8.89	0.00
Harrisonburg, VA MSA	21	15.44	0.00	0.00	9.28	4.76	78.22	76.19	12.50	19.05	16.67	0.00	16.67	18.84	7.69
Kingsport-Bristol-Bristol, VA MSA	1	0.74	0.00	0.00	11.72	0.00	84.29	100.00	3.99	0.00	0.67	0.00	0.00	0.92	0.00
Lynchburg, VA MSA	14	10.29	1.19	0.00	6.90	7.14	72.17	92.86	19.74	0.00	26.67	0.00	50.00	28.21	0.00
Martinsville-Henry County, VA Non-Metro	0	0.00	0.00	0.00	3.25	0.00	95.12	0.00	1.63	0.00	0.00	0.00	0.00	0.00	0.00
Northern VA Non-Metro	5	3.68	0.00	0.00	0.00	0.00	50.25	40.00	49.75	60.00	15.63	0.00	0.00	14.29	21.43
Northwestern VA Non-Metro	8	5.88	0.00	0.00	1.27	0.00	38.28	25.00	60.46	75.00	5.05	0.00	0.00	5.71	4.76
Prince Edward County, VA Non-Metro	0	0.00	0.00	0.00	0.00	0.00	100.00	0.00	0.00	0.00	16.67	0.00	0.00	16.67	0.00
Roanoke, VA MSA	2	1.47	0.99	0.00	4.63	0.00	61.34	100.00	32.93	0.00	8.33	0.00	0.00	7.41	11.11
Southside VA Non-Metro	9	6.62	0.00	0.00	7.71	11.11	92.29	88.89	0.00	0.00	8.33	0.00	16.67	7.78	0.00
Western VA Non-Metro	5	3.68	0.00	0.00	12.40	0.00	87.60	100.00	0.00	0.00	1.67	0.00	0.00	1.76	0.00
Winchester, VA MSA	10	7.35	0.00	0.00	7.82	0.00	67.10	50.00	25.08	50.00	66.67	0.00	0.00	57.14	80.00

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	7,940	30.57	19.79	13.19	18.40	27.87	22.83	25.39	38.99	33.56	25.90	22.21	24.46	27.51	27.73
Virginia Beach-Norfolk-Newport News, VA MSA	11,584	44.59	19.21	6.16	18.61	28.19	23.23	32.40	38.95	33.24	27.45	23.13	27.50	29.44	26.56
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	461	1.77	20.15	8.47	17.69	24.03	23.23	26.54	38.93	40.96	16.41	17.19	16.53	18.21	15.10
Charlottesville, VA MSA	736	2.83	19.18	6.38	18.34	24.13	23.26	25.10	39.21	44.38	17.38	12.97	17.85	18.33	17.60
Danville, VA MSA	273	1.05	20.64	10.84	17.93	20.48	22.05	25.70	39.38	42.97	16.62	19.23	11.83	17.49	18.52
Harrisonburg, VA MSA	322	1.24	17.33	5.86	19.26	28.66	25.06	28.99	38.36	36.48	16.70	9.21	17.31	16.73	17.79
Kingsport-Bristol-Bristol, VA MSA	187	0.72	19.93	7.34	19.89	17.51	23.12	19.77	37.07	55.37	15.02	13.46	11.02	12.99	18.63
Lynchburg, VA MSA	922	3.55	19.36	9.54	18.36	24.83	23.19	23.56	39.10	42.07	19.51	17.58	18.46	18.13	21.93
Martinsville-Henry County, VA Non-Metro	81	0.31	19.77	12.50	19.33	23.61	23.58	29.17	37.32	34.72	10.76	11.11	7.87	10.87	15.00
Northern VA Non-Metro	611	2.35	12.79	2.74	14.05	13.85	20.61	28.03	52.55	55.38	25.80	17.02	22.77	25.68	27.32
Northwestern VA Non-Metro	459	1.77	14.27	8.72	16.01	23.39	22.26	27.52	47.45	40.37	17.13	20.63	14.65	15.44	19.64
Prince Edward County, VA Non-Metro	31	0.12	25.80	3.33	15.63	20.00	20.81	50.00	37.76	26.67	15.24	0.00	15.79	20.45	12.50
Roanoke, VA MSA	1,217	4.68	18.02	12.50	18.98	25.88	24.06	26.41	38.94	35.21	19.20	19.44	16.97	20.98	19.66
Southside VA Non-Metro	119	0.46	21.53	5.56	17.95	30.56	23.68	26.85	36.83	37.04	21.75	13.33	22.50	23.40	21.13
Western VA Non-Metro	231	0.89	25.13	8.80	21.31	21.76	23.19	30.09	30.37	39.35	10.87	8.26	10.00	11.58	11.62
Winchester, VA MSA	803	3.09	15.09	9.06	18.31	25.72	23.44	24.41	43.15	40.81	25.69	24.68	24.66	27.54	25.65

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 5.4% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	473	26.12	19.79	14.75	18.40	27.33	22.83	26.90	38.99	31.02	17.50	14.39	17.68	19.42	17.59
Virginia Beach-Norfolk-Newport News, VA MSA	706	38.98	19.21	9.59	18.61	26.16	23.23	33.14	38.95	31.10	14.76	12.77	20.60	15.44	11.46
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	45	2.48	20.15	20.45	17.69	15.91	23.23	27.27	38.93	36.36	5.83	7.35	2.33	6.49	7.69
Charlottesville, VA MSA	49	2.71	19.18	20.83	18.34	22.92	23.26	18.75	39.21	37.50	6.70	4.95	5.76	6.52	9.90
Danville, VA MSA	20	1.10	20.64	5.00	17.93	25.00	22.05	35.00	39.38	35.00	9.73	4.55	11.54	11.11	10.53
Harrisonburg, VA MSA	28	1.55	17.33	0.00	19.26	10.71	25.06	32.14	38.36	57.14	10.24	0.00	4.55	8.33	16.67
Kingsport-Bristol-Bristol, VA MSA	14	0.77	19.93	7.14	19.89	21.43	23.12	21.43	37.07	50.00	4.98	2.94	2.56	6.82	5.95
Lynchburg, VA MSA	113	6.24	19.36	17.12	18.36	18.02	23.19	27.03	39.10	37.84	13.73	15.28	11.83	15.32	12.88
Martinsville-Henry County, VA Non-Metro	13	0.72	19.77	27.27	19.33	9.09	23.58	27.27	37.32	36.36	6.67	2.78	2.17	23.08	20.00
Northern VA Non-Metro	39	2.15	12.79	12.82	14.05	17.95	20.61	20.51	52.55	48.72	15.45	25.00	17.65	0.00	17.54
Northwestern VA Non-Metro	66	3.64	14.27	7.94	16.01	22.22	22.26	22.22	47.45	47.62	13.11	20.00	11.32	9.86	14.63
Prince Edward County, VA Non-Metro	8	0.44	25.80	0.00	15.63	25.00	20.81	25.00	37.76	50.00	14.71	0.00	25.00	9.09	17.65
Roanoke, VA MSA	115	6.35	18.02	11.61	18.98	25.00	24.06	28.57	38.94	34.82	7.57	1.91	7.62	7.19	13.17
Southside VA Non-Metro	27	1.49	21.53	18.52	17.95	33.33	23.68	14.81	36.83	33.33	25.64	35.71	42.86	13.33	20.00
Western VA Non-Metro	61	3.37	25.13	21.31	21.31	37.70	23.19	18.03	30.37	22.95	5.11	5.73	7.82	3.52	3.21
Winchester, VA MSA	34	1.88	15.09	15.15	18.31	18.18	23.44	18.18	43.15	48.48	11.70	25.00	3.70	13.33	12.50

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.4% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: VIRGINIA						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Richmond, VA MSA	11,432	29.31	19.79	7.15	18.40	18.24	22.83	23.84	38.99	50.77	21.17	21.42	21.29	20.25	21.54
Virginia Beach-Norfolk-Newport News, VA MSA	16,211	41.56	19.21	5.16	18.61	17.62	23.23	25.44	38.95	51.77	21.68	20.62	22.57	21.74	21.46
<b>Limited Review:</b>															
Blacksburg-Christiansburg-Radford, VA MSA	910	2.33	20.15	5.30	17.69	15.18	23.23	26.39	38.93	53.13	18.78	12.71	18.93	17.09	20.44
Charlottesville, VA MSA	1,543	3.96	19.18	6.39	18.34	16.46	23.26	21.60	39.21	55.56	17.97	14.84	17.55	17.26	18.93
Danville, VA MSA	324	0.83	20.64	3.60	17.93	16.91	22.05	25.90	39.38	53.60	17.70	11.36	16.30	18.14	18.67
Harrisonburg, VA MSA	701	1.80	17.33	4.51	19.26	14.00	25.06	28.15	38.36	53.34	19.15	14.88	15.51	19.01	21.34
Kingsport-Bristol-Bristol, VA MSA	314	0.81	19.93	1.04	19.89	15.28	23.12	21.53	37.07	62.15	14.72	5.00	13.89	13.56	16.39
Lynchburg, VA MSA	1,842	4.72	19.36	5.17	18.36	15.93	23.19	23.37	39.10	55.53	21.44	23.33	18.16	20.68	22.88
Martinsville-Henry County, VA Non-Metro	150	0.38	19.77	11.11	19.33	18.52	23.58	20.00	37.32	50.37	14.48	15.25	8.91	12.82	17.52
Northern VA Non-Metro	791	2.03	12.79	2.10	14.05	7.81	20.61	21.92	52.55	68.17	21.70	15.00	19.17	21.50	22.35
Northwestern VA Non-Metro	952	2.44	14.27	4.56	16.01	17.08	22.26	22.69	47.45	55.67	15.67	16.54	15.75	14.42	16.12
Prince Edward County, VA Non-Metro	43	0.11	25.80	5.26	15.63	13.16	20.81	28.95	37.76	52.63	9.39	11.11	9.09	8.70	9.62
Roanoke, VA MSA	1,989	5.10	18.02	6.76	18.98	17.25	24.06	23.45	38.94	52.54	18.23	16.04	15.64	17.87	19.89
Southside VA Non-Metro	210	0.54	21.53	6.22	17.95	15.54	23.68	23.83	36.83	54.40	16.40	13.73	16.04	19.29	15.82
Western VA Non-Metro	417	1.07	25.13	6.63	21.31	15.82	23.19	23.21	30.37	54.34	13.72	11.02	10.30	11.96	16.46
Winchester, VA MSA	1,179	3.02	15.09	5.71	18.31	14.19	23.44	20.39	43.15	59.70	30.00	31.36	28.24	26.72	31.58

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 18.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: VIRGINIA			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Richmond, VA MSA	5,140	38.32	68.51	55.86	90.74	4.63	4.63	19.97	25.04
Virginia Beach-Norfolk-Newport News, VA MSA	4,180	31.16	67.68	61.99	94.16	3.28	2.56	14.28	20.66
<b>Limited Review:</b>									
Blacksburg-Christiansburg-Radford, VA MSA	199	1.48	66.55	59.80	92.46	6.03	1.51	10.69	14.35
Charlottesville, VA MSA	592	4.41	68.17	63.18	94.59	3.38	2.03	15.17	20.25
Danville, VA MSA	108	0.81	70.12	65.74	94.44	3.70	1.85	7.11	8.79
Harrisonburg, VA MSA	228	1.70	69.84	57.02	89.04	6.14	4.82	9.47	12.46
Kingsport-Bristol-Bristol, VA MSA	138	1.03	68.70	66.67	92.75	4.35	2.90	8.00	7.72
Lynchburg, VA MSA	719	5.36	69.23	54.94	90.26	4.45	5.29	19.68	23.41
Martinsville-Henry County, VA Non-Metro	43	0.32	71.70	67.44	100.00	0.00	0.00	4.20	6.62
Northern VA Non-Metro	368	2.74	73.25	49.46	94.84	3.80	1.36	19.87	22.11
Northwestern VA Non-Metro	203	1.51	70.20	63.55	94.09	3.45	2.46	7.79	10.30
Prince Edward County, VA Non-Metro	47	0.35	69.72	65.96	91.49	2.13	6.38	15.53	21.78
Roanoke, VA MSA	690	5.14	68.17	58.99	93.48	2.75	3.77	13.19	18.13
Southside VA Non-Metro	132	0.98	71.77	46.97	93.94	4.55	1.52	19.88	18.06
Western VA Non-Metro	292	2.18	67.92	63.36	95.21	3.42	1.37	13.21	17.46
Winchester, VA MSA	336	2.50	70.84	50.00	79.76	9.82	10.42	14.28	15.35

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 26.9% 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: VIRGINIA				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Richmond, VA MSA	25	18.38	97.80	84.00	100.00	0.00	0.00	18.03	23.38
Virginia Beach-Norfolk-Newport News, VA MSA	19	13.97	96.38	78.95	89.47	5.26	5.26	18.06	18.64
<b>Limited Review:</b>									
Blacksburg-Christiansburg-Radford, VA MSA	7	5.15	97.34	100.00	100.00	0.00	0.00	7.69	9.38
Charlottesville, VA MSA	3	2.21	97.83	100.00	100.00	0.00	0.00	10.71	15.79
Danville, VA MSA	7	5.15	99.52	28.57	100.00	0.00	0.00	8.70	2.94
Harrisonburg, VA MSA	21	15.44	97.52	76.19	95.24	4.76	0.00	16.67	17.72
Kingsport-Bristol-Bristol, VA MSA	1	0.74	98.50	100.00	100.00	0.00	0.00	0.67	0.68
Lynchburg, VA MSA	14	10.29	99.14	92.86	92.86	7.14	0.00	26.67	32.35
Martinsville-Henry County, VA Non-Metro	0	0.00	94.31	0.00	0.00	0.00	0.00	0.00	0.00
Northern VA Non-Metro	5	3.68	98.23	80.00	100.00	0.00	0.00	15.63	21.05
Northwestern VA Non-Metro	8	5.88	98.86	100.00	100.00	0.00	0.00	5.05	5.62
Prince Edward County, VA Non-Metro	0	0.00	98.86	0.00	0.00	0.00	0.00	16.67	20.00
Roanoke, VA MSA	2	1.47	97.58	100.00	100.00	0.00	0.00	8.33	9.68
Southside VA Non-Metro	9	6.62	98.55	77.78	88.89	0.00	11.11	8.33	7.59
Western VA Non-Metro	5	3.68	99.18	40.00	100.00	0.00	0.00	1.67	1.34
Winchester, VA MSA	10	7.35	97.07	70.00	100.00	0.00	0.00	66.67	66.67

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 13.2% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: VIRGINIA		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Richmond, VA MSA	11	14,134	145	18,859	156	32,993	25.12	0	0
Virginia Beach-Norfolk-Newport News, VA MSA	15	26,543	65	30,859	80	57,402	43.70	0	0
<b>Limited Review:</b>									
Blacksburg-Christiansburg-Radford, VA MSA	2	1,676	8	99	10	1,775	1.35	0	0
Charlottesville, VA MSA	1	701	18	781	19	1,482	1.13	0	0
Danville, VA MSA	0	0	1	1	1	1	0.00	0	0
Harrisonburg, VA MSA	0	0	4	27	4	27	0.02	0	0
Kingsport-Bristol-Bristol, VA MSA	1	334	4	1,027	5	1,361	1.04	0	0
Lynchburg, VA MSA	1	2,279	12	78	13	2,357	1.79	0	0
Martinsville-Henry County, VA Non-Metro	0	0	0	0	0	0	0.00	0	0
Northern VA Non-Metro	0	0	3	20	3	20	0.02	0	0
Northwestern VA Non-Metro	0	0	5	1,866	5	1,866	1.42	0	0
Prince Edward County, VA Non-Metro	0	0	2	431	2	431	0.33	0	0
Roanoke, VA MSA	1	214	24	12,229	25	12,443	9.47	0	0
Southside VA Non-Metro	0	0	1	10	1	10	0.01	0	0
Western VA Non-Metro	1	814	6	8,313	7	9,127	6.95	0	0
Winchester, VA MSA	0	0	6	73	6	73	0.06	0	0
<b>Statewide:</b>									
Virginia Statewide	1	4,868	2	5,123	3	9,991	7.61	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: VIRGINIA																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Richmond, VA MSA	35.04	64	32.99	1.56	35.94	26.56	35.94	0	2	0	-1	0	-1	7.15	22.87	37.20	32.68
Virginia Beach-Norfolk-Newport News, VA MSA	26.15	54	27.84	3.70	16.67	44.44	35.19	1	2	0	0	0	-1	5.33	23.24	37.98	33.45
Limited Review:																	
Blacksburg-Christiansburg-Radford, VA MSA	2.09	6	3.09	0.00	50.00	33.33	16.67	0	0	0	0	0	0	0.00	17.62	46.61	30.57
Charlottesville, VA MSA	4.32	10	5.15	0.00	10.00	50.00	40.00	1	0	0	0	0	1	4.95	19.46	50.44	23.85
Danville, VA MSA	0.33	1	0.52	0.00	0.00	0.00	100.00	0	0	0	0	0	0	1.54	13.52	62.05	22.89
Harrisonburg, VA MSA	2.17	4	2.06	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	14.55	64.12	21.34
Kingsport-Bristol-Bristol, VA MSA	2.05	4	2.06	0.00	50.00	50.00	0.00	1	1	0	0	0	0	2.99	16.82	70.77	9.42
Lynchburg, VA MSA	5.95	15	7.73	6.67	33.33	46.67	13.33	0	2	-1	0	0	-1	2.11	19.69	61.32	16.88
Martinsville-Henry County, VA Non-Metro	0.27	1	0.52	0.00	0.00	100.00	0.00	0	1	0	0	-1	0	0.00	35.30	60.43	4.28
Northern VA Non-Metro	2.13	6	3.09	0.00	0.00	16.67	83.33	0	0	0	0	0	0	0.00	0.00	22.18	77.82
Northwestern VA Non-Metro	1.02	3	1.55	33.33	0.00	33.33	33.33	0	0	0	0	0	0	0.69	5.53	48.89	44.89
Prince Edward County, VA Non-Metro	0.35	1	0.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	10.27	28.58	61.15	0.00
Roanoke, VA MSA	12.20	11	5.67	9.09	27.27	36.36	27.27	0	0	0	0	0	0	4.27	23.38	41.62	30.73
Southside VA Non-Metro	0.97	3	1.55	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	29.55	70.45	0.00
Western VA Non-Metro	2.65	7	3.61	0.00	57.14	42.86	0.00	0	0	0	0	0	0	0.00	35.36	64.64	0.00
Winchester, VA MSA	2.31	4	2.06	0.00	75.00	25.00	0.00	0	0	0	0	0	0	0.00	21.87	43.55	34.57

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: WASHINGTON								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Seattle-Bellevue-Everett, WA MD	52.68	98,077	29,128,526	40,504	1,567,045	248	9,520	41	134,403	138,870	30,839,494	71.47
Limited Review:												
Bellingham, WA MSA	3.09	6,082	1,410,213	2,022	91,837	52	1,731	3	10,119	8,159	1,513,901	1.65
Bremerton-Silverdale, WA MSA	4.11	8,532	2,050,310	2,282	87,908	17	636	1	2,200	10,832	2,141,054	1.93
Centralia, WA Non-Metro	0.84	1,627	288,443	551	23,331	40	1,938	0	0	2,218	313,712	0.55
Ellensburg, WA Non-Metro	0.67	1,139	254,180	555	19,272	60	6,482	0	0	1,754	279,934	0.44
Kennewick-Pasco-Richland, WA MSA	4.27	10,497	1,843,767	730	33,907	40	2,098	0	0	11,267	1,879,772	0.28
Mount Vernon-Anacortes, WA MSA	2.07	4,090	917,026	1,327	43,166	27	654	2	2,375	5,446	963,221	1.17
Okanogan County, WA Non-Metro	0.68	1,057	169,153	560	20,618	170	11,480	0	0	1,787	201,251	0.77
Olympia, WA MSA	4.68	10,744	2,472,787	1,585	66,465	13	430	0	0	12,342	2,539,681	1.27
Olympic-Islands, WA Non-Metro	3.14	5,650	1,322,657	2,565	75,622	67	1,533	0	0	8,282	1,399,812	2.64
Spokane, WA MSA	7.11	15,042	2,689,127	3,624	149,132	82	3,233	1	5,005	18,749	2,846,497	4.24
Tacoma, WA MD	12.74	27,214	6,336,633	6,329	260,223	49	1,702	1	4,900	33,593	6,603,458	9.86
Wenatchee-East Wenatchee, WA MSA	1.86	3,461	703,595	1,274	46,278	171	7,445	0	0	4,906	757,319	1.87
Yakima, WA MSA	2.06	3,855	650,366	1,361	61,276	207	12,117	0	0	5,423	723,759	1.86

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE		Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	28,277	44.46	0.49	0.81	15.58	16.53	55.45	53.98	28.48	28.68	18.45	21.89	18.71	18.28	18.51
<b>Limited Review:</b>															
Bellingham, WA MSA	1,921	3.02	0.00	0.00	8.83	7.91	71.28	71.21	19.90	20.87	16.80	0.00	15.58	16.84	17.15
Bremerton-Silverdale, WA MSA	2,761	4.34	1.75	2.39	9.31	10.61	69.62	71.35	19.32	15.65	21.19	23.08	19.11	22.32	17.63
Centralia, WA Non-Metro	533	0.84	0.00	0.00	12.40	11.26	78.81	79.55	8.78	9.19	21.18	0.00	17.71	21.64	21.92
Ellensburg, WA Non-Metro	385	0.61	0.00	0.00	9.23	13.51	60.26	68.05	30.50	18.44	15.71	0.00	10.00	17.75	15.07
Kennewick-Pasco-Richland, WA MSA	5,078	7.98	2.95	2.74	13.08	14.18	55.11	51.79	28.86	31.29	24.64	47.50	30.05	26.43	19.12
Mount Vernon-Anacortes, WA MSA	1,192	1.87	0.00	0.00	9.11	10.32	71.16	77.52	19.73	12.16	21.96	0.00	22.45	22.43	19.37
Okanogan County, WA Non-Metro	268	0.42	0.00	0.00	51.98	43.28	48.02	56.72	0.00	0.00	25.37	0.00	25.51	25.29	0.00
Olympia, WA MSA	4,006	6.30	0.00	0.00	12.34	7.54	68.09	75.49	19.57	16.97	24.88	0.00	21.68	26.43	20.42
Olympic-Islands, WA Non-Metro	1,514	2.38	0.00	0.00	2.40	2.97	62.37	52.44	35.23	44.58	18.37	0.00	15.38	19.06	17.76
Spokane, WA MSA	5,153	8.10	0.28	0.72	21.71	22.63	44.82	45.14	33.20	31.52	20.00	28.30	20.07	20.50	19.09
Tacoma, WA MD	9,924	15.60	0.50	0.45	10.96	9.98	63.09	66.64	25.46	22.93	22.61	20.59	24.43	22.50	22.29
Wenatchee-East Wenatchee, WA MSA	1,048	1.65	0.00	0.00	18.55	20.99	54.40	45.99	27.04	33.02	22.11	0.00	25.41	20.62	23.16
Yakima, WA MSA	1,545	2.43	1.43	0.84	22.04	15.02	38.95	37.93	37.58	46.21	18.13	0.00	18.18	18.64	18.03

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	2,270	45.29	0.49	0.44	15.58	10.75	55.45	52.47	28.48	36.34	16.07	0.00	11.35	15.43	18.95
<b>Limited Review:</b>															
Bellingham, WA MSA	177	3.53	0.00	0.00	8.83	9.60	71.28	70.06	19.90	20.34	8.40	0.00	6.90	8.46	8.70
Bremerton-Silverdale, WA MSA	256	5.11	1.75	1.95	9.31	5.86	69.62	67.97	19.32	24.22	16.62	60.00	7.14	16.22	19.05
Centralia, WA Non-Metro	61	1.22	0.00	0.00	12.40	11.48	78.81	77.05	8.78	11.48	14.06	0.00	0.00	18.00	0.00
Ellensburg, WA Non-Metro	37	0.74	0.00	0.00	9.23	8.11	60.26	59.46	30.50	32.43	9.09	0.00	12.50	8.57	8.70
Kennewick-Pasco-Richland, WA MSA	156	3.11	2.95	1.28	13.08	11.54	55.11	51.28	28.86	35.90	9.94	9.09	20.83	12.30	5.00
Mount Vernon-Anacortes, WA MSA	125	2.49	0.00	0.00	9.11	8.80	71.16	68.80	19.73	22.40	8.55	0.00	12.50	8.86	6.67
Okanogan County, WA Non-Metro	53	1.06	0.00	0.00	51.98	62.26	48.02	37.74	0.00	0.00	28.57	0.00	26.67	30.77	0.00
Olympia, WA MSA	215	4.29	0.00	0.00	12.34	11.63	68.09	65.58	19.57	22.79	18.01	0.00	31.25	15.54	21.28
Olympic-Islands, WA Non-Metro	200	3.99	0.00	0.00	2.40	0.50	62.37	48.50	35.23	51.00	17.84	0.00	25.00	19.01	16.38
Spokane, WA MSA	567	11.31	0.28	0.53	21.71	19.75	44.82	39.15	33.20	40.56	13.80	0.00	14.56	11.25	16.13
Tacoma, WA MD	624	12.45	0.50	0.32	10.96	9.29	63.09	59.29	25.46	31.09	17.10	0.00	20.00	16.12	18.23
Wenatchee-East Wenatchee, WA MSA	148	2.95	0.00	0.00	18.55	14.19	54.40	48.65	27.04	37.16	11.11	0.00	0.00	12.50	14.63
Yakima, WA MSA	123	2.45	1.43	0.00	22.04	8.13	38.95	26.02	37.58	65.85	12.75	0.00	13.16	8.05	16.26

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	67,468	52.56	0.49	0.52	15.58	11.75	55.45	53.18	28.48	34.55	18.58	22.11	18.20	18.47	18.79
<b>Limited Review:</b>															
Bellingham, WA MSA	3,980	3.10	0.00	0.00	8.83	8.57	71.28	68.84	19.90	22.59	15.03	0.00	14.61	14.81	15.84
Bremerton-Silverdale, WA MSA	5,514	4.30	1.75	1.61	9.31	8.12	69.62	69.31	19.32	20.95	18.57	16.95	21.07	18.46	18.23
Centralia, WA Non-Metro	1,033	0.80	0.00	0.00	12.40	9.58	78.81	80.25	8.78	10.16	18.58	0.00	15.18	19.32	17.55
Ellensburg, WA Non-Metro	717	0.56	0.00	0.00	9.23	11.02	60.26	55.23	30.50	33.75	15.75	0.00	12.04	17.92	13.29
Kennewick-Pasco-Richland, WA MSA	5,259	4.10	2.95	1.18	13.08	6.77	55.11	47.50	28.86	44.55	21.34	19.10	23.34	21.80	20.59
Mount Vernon-Anacortes, WA MSA	2,773	2.16	0.00	0.00	9.11	7.00	71.16	73.57	19.73	19.44	20.75	0.00	17.90	22.16	17.53
Okanogan County, WA Non-Metro	736	0.57	0.00	0.00	51.98	46.60	48.02	53.40	0.00	0.00	24.13	0.00	24.46	23.84	0.00
Olympia, WA MSA	6,519	5.08	0.00	0.00	12.34	7.56	68.09	69.63	19.57	22.81	20.70	0.00	17.35	22.13	17.82
Olympic-Islands, WA Non-Metro	3,935	3.07	0.00	0.00	2.40	1.02	62.37	46.30	35.23	52.68	17.60	0.00	17.57	16.48	18.75
Spokane, WA MSA	9,317	7.26	0.28	0.46	21.71	16.66	44.82	41.30	33.20	41.58	18.62	18.46	19.34	18.40	18.55
Tacoma, WA MD	16,653	12.97	0.50	0.37	10.96	7.52	63.09	63.62	25.46	28.49	19.54	16.88	19.24	20.92	16.93
Wenatchee-East Wenatchee, WA MSA	2,264	1.76	0.00	0.00	18.55	16.25	54.40	51.94	27.04	31.80	19.27	0.00	21.79	18.90	18.71
Yakima, WA MSA	2,184	1.70	1.43	0.55	22.04	10.76	38.95	33.56	37.58	55.13	14.70	14.29	14.25	14.56	14.90

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	62	63.27	3.72	6.45	36.96	29.03	43.29	46.77	16.04	17.74	3.73	0.00	2.02	4.49	5.66
<b>Limited Review:</b>															
Bellingham, WA MSA	4	4.08	0.00	0.00	27.18	25.00	62.25	50.00	10.58	25.00	0.00	0.00	0.00	0.00	0.00
Bremerton-Silverdale, WA MSA	1	1.02	9.25	0.00	28.01	0.00	54.98	100.00	7.76	0.00	7.69	0.00	0.00	11.11	0.00
Centralia, WA Non-Metro	0	0.00	0.00	0.00	19.04	0.00	74.45	0.00	6.51	0.00	0.00	0.00	0.00	0.00	0.00
Ellensburg, WA Non-Metro	0	0.00	0.00	0.00	20.88	0.00	78.84	0.00	0.28	0.00	0.00	0.00	0.00	0.00	0.00
Kennewick-Pasco-Richland, WA MSA	4	4.08	18.46	0.00	22.92	0.00	45.18	25.00	13.44	75.00	9.52	0.00	0.00	0.00	50.00
Mount Vernon-Anacortes, WA MSA	0	0.00	0.00	0.00	13.16	0.00	84.67	0.00	2.16	0.00	0.00	0.00	0.00	0.00	0.00
Okanogan County, WA Non-Metro	0	0.00	0.00	0.00	60.60	0.00	39.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Olympia, WA MSA	4	4.08	0.00	0.00	31.69	25.00	66.41	50.00	1.90	25.00	5.56	0.00	0.00	0.00	100.00
Olympic-Islands, WA Non-Metro	1	1.02	0.00	0.00	12.68	0.00	81.18	100.00	6.15	0.00	0.00	0.00	0.00	0.00	0.00
Spokane, WA MSA	5	5.10	9.33	40.00	54.66	40.00	25.88	20.00	10.14	0.00	4.17	20.00	4.17	0.00	0.00
Tacoma, WA MD	13	13.27	8.47	0.00	29.99	69.23	52.41	30.77	9.13	0.00	0.00	0.00	0.00	0.00	0.00
Wenatchee-East Wenatchee, WA MSA	1	1.02	0.00	0.00	38.67	0.00	51.29	0.00	10.04	100.00	0.00	0.00	0.00	0.00	0.00
Yakima, WA MSA	3	3.06	15.70	66.67	38.09	33.33	29.23	0.00	16.99	0.00	9.09	0.00	100.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: WASHINGTON				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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	40,504	62.06	2.15	2.15	21.37	17.83	48.65	47.78	27.84	32.23	18.58	19.48	16.56	18.81	20.35
<b>Limited Review:</b>															
Bellingham, WA MSA	2,022	3.10	0.00	0.00	11.60	12.31	73.15	68.10	15.25	19.58	13.49	0.00	16.44	12.42	18.00
Bremerton-Silverdale, WA MSA	2,282	3.50	3.88	1.97	9.73	8.33	62.08	50.61	24.31	39.09	17.85	10.91	16.30	16.50	24.17
Centralia, WA Non-Metro	551	0.84	0.00	0.00	13.87	13.79	78.78	79.67	7.34	6.53	15.82	0.00	16.95	17.17	12.16
Ellensburg, WA Non-Metro	555	0.85	0.00	0.00	9.13	10.45	63.50	63.42	27.38	26.13	23.27	0.00	25.49	24.49	23.50
Kennewick-Pasco-Richland, WA MSA	730	1.12	3.97	2.88	18.66	20.41	47.66	48.22	29.70	28.49	5.19	7.56	5.08	5.18	5.34
Mount Vernon-Anacortes, WA MSA	1,327	2.03	0.00	0.00	15.02	17.41	68.86	63.68	16.12	18.91	17.46	0.00	19.54	17.77	16.90
Okanogan County, WA Non-Metro	560	0.86	0.00	0.00	50.73	70.54	49.27	29.46	0.00	0.00	35.85	0.00	46.74	26.42	0.00
Olympia, WA MSA	1,585	2.43	0.00	0.00	19.87	20.25	64.73	59.24	15.40	20.50	12.18	0.00	11.67	12.51	13.83
Olympic-Islands, WA Non-Metro	2,565	3.93	0.00	0.00	4.89	3.47	64.19	59.06	30.92	37.47	20.27	0.00	19.69	19.77	24.06
Spokane, WA MSA	3,624	5.55	3.44	2.40	33.32	30.55	36.19	33.50	27.05	33.55	12.13	6.52	11.75	10.99	15.18
Tacoma, WA MD	6,329	9.70	1.60	0.66	18.88	17.44	56.75	52.98	22.77	28.91	14.93	7.44	15.73	14.83	16.20
Wenatchee-East Wenatchee, WA MSA	1,274	1.95	0.00	0.00	23.12	21.27	57.30	58.56	19.57	20.17	18.78	0.00	23.50	19.95	13.19
Yakima, WA MSA	1,361	2.09	8.36	10.14	21.82	13.45	36.97	32.48	32.86	43.94	13.22	26.24	8.75	11.75	14.82

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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	248	19.95	0.92	1.61	16.54	6.85	59.03	58.06	23.51	33.47	33.84	100.00	15.00	36.13	36.36
<b>Limited Review:</b>															
Bellingham, WA MSA	52	4.18	0.00	0.00	5.71	7.69	88.05	92.31	6.23	0.00	5.00	0.00	100.00	4.69	0.00
Bremerton-Silverdale, WA MSA	17	1.37	2.22	5.88	5.00	0.00	66.94	41.18	25.83	52.94	23.81	100.00	0.00	50.00	9.09
Centralia, WA Non-Metro	40	3.22	0.00	0.00	8.88	22.50	80.28	50.00	10.83	27.50	35.48	0.00	100.00	27.27	100.00
Ellensburg, WA Non-Metro	60	4.83	0.00	0.00	3.50	3.33	43.94	43.33	52.56	53.33	32.56	0.00	0.00	26.67	35.71
Kennewick-Pasco-Richland, WA MSA	40	3.22	0.95	0.00	21.35	20.00	63.97	50.00	13.73	30.00	4.18	0.00	2.94	2.78	19.05
Mount Vernon-Anacortes, WA MSA	27	2.17	0.00	0.00	7.40	14.81	62.66	33.33	29.93	51.85	12.31	0.00	33.33	7.14	20.00
Okanogan County, WA Non-Metro	170	13.68	0.00	0.00	64.70	78.82	35.30	21.18	0.00	0.00	40.18	0.00	38.78	63.64	0.00
Olympia, WA MSA	13	1.05	0.00	0.00	17.87	7.69	65.31	30.77	16.82	61.54	18.18	0.00	0.00	30.00	25.00
Olympic-Islands, WA Non-Metro	67	5.39	0.00	0.00	2.10	0.00	66.43	40.30	31.46	59.70	46.15	0.00	0.00	40.91	60.00
Spokane, WA MSA	82	6.60	0.37	0.00	15.86	14.63	45.01	32.93	38.77	52.44	27.59	0.00	57.14	21.05	28.57
Tacoma, WA MD	49	3.94	0.89	0.00	12.29	0.00	62.38	57.14	24.44	42.86	38.24	0.00	0.00	38.10	41.67
Wenatchee-East Wenatchee, WA MSA	171	13.76	0.00	0.00	17.02	14.04	60.34	75.44	22.64	10.53	35.33	0.00	38.46	38.26	22.73
Yakima, WA MSA	207	16.65	1.18	1.45	10.25	2.90	67.86	66.18	20.72	29.47	23.87	100.00	0.00	22.89	36.84

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	28,277	44.46	18.50	6.56	18.70	22.29	24.54	29.33	38.26	41.82	19.03	16.66	17.88	19.67	20.09
<b>Limited Review:</b>															
Bellingham, WA MSA	1,921	3.02	18.16	5.16	18.66	20.89	23.94	30.14	39.24	43.81	18.38	24.68	18.15	17.41	18.16
Bremerton-Silverdale, WA MSA	2,761	4.34	17.45	3.38	19.02	24.99	24.52	34.77	39.02	36.85	21.63	16.52	20.44	22.20	23.25
Centralia, WA Non-Metro	533	0.84	19.91	6.10	19.63	25.00	23.50	29.33	36.96	39.57	21.10	20.83	19.50	19.91	23.77
Ellensburg, WA Non-Metro	385	0.61	18.08	1.60	16.33	13.10	21.63	21.39	43.95	63.90	15.50	15.79	17.82	11.97	16.04
Kennewick-Pasco-Richland, WA MSA	5,078	7.98	20.23	11.43	18.40	26.12	21.76	27.51	39.61	34.94	24.93	32.05	27.09	23.74	22.18
Mount Vernon-Anacortes, WA MSA	1,192	1.87	18.11	3.40	18.93	21.71	23.36	31.12	39.60	43.77	22.06	17.02	24.67	20.06	22.85
Okanogan County, WA Non-Metro	268	0.42	27.59	6.64	20.88	24.61	22.80	27.73	28.73	41.02	24.70	26.67	29.82	20.34	24.14
Olympia, WA MSA	4,006	6.30	17.26	3.81	18.90	25.75	25.85	35.65	37.98	34.78	25.77	19.85	27.88	25.60	25.42
Olympic-Islands, WA Non-Metro	1,514	2.38	14.37	2.52	16.86	12.67	22.68	27.18	46.09	57.63	19.36	23.08	19.24	16.95	20.53
Spokane, WA MSA	5,153	8.10	18.88	11.08	18.97	24.91	22.97	28.19	39.18	35.83	20.41	18.78	18.82	20.95	22.21
Tacoma, WA MD	9,924	15.60	18.66	5.65	18.89	25.23	23.23	34.26	39.22	34.87	22.20	20.95	20.04	23.12	23.86
Wenatchee-East Wenatchee, WA MSA	1,048	1.65	19.86	5.08	19.12	24.90	21.01	29.20	40.01	40.82	23.26	32.65	29.88	21.55	20.93
Yakima, WA MSA	1,545	2.43	20.45	8.63	18.68	20.48	20.51	29.05	40.36	41.83	17.98	21.09	15.66	17.21	19.05

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.7% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	2,270	45.29	18.50	5.21	18.70	19.07	24.54	28.52	38.26	47.19	16.46	17.68	16.76	14.16	17.59
<b>Limited Review:</b>															
Bellingham, WA MSA	177	3.53	18.16	3.95	18.66	15.25	23.94	32.77	39.24	48.02	8.65	3.57	6.25	11.48	8.33
Bremerton-Silverdale, WA MSA	256	5.11	17.45	3.94	19.02	16.14	24.52	28.35	39.02	51.57	17.22	15.38	16.92	17.89	17.24
Centralia, WA Non-Metro	61	1.22	19.91	1.64	19.63	14.75	23.50	39.34	36.96	44.26	14.52	25.00	0.00	23.53	12.90
Ellensburg, WA Non-Metro	37	0.74	18.08	2.70	16.33	10.81	21.63	21.62	43.95	64.86	9.09	33.33	12.50	13.33	5.00
Kennewick-Pasco-Richland, WA MSA	156	3.11	20.23	9.21	18.40	17.76	21.76	26.97	39.61	46.05	9.09	23.81	11.11	10.98	5.91
Mount Vernon-Anacortes, WA MSA	125	2.49	18.11	1.60	18.93	14.40	23.36	36.00	39.60	48.00	8.85	0.00	5.56	6.90	12.07
Okanogan County, WA Non-Metro	53	1.06	27.59	9.43	20.88	16.98	22.80	33.96	28.73	39.62	29.63	100.00	50.00	16.67	23.53
Olympia, WA MSA	215	4.29	17.26	5.16	18.90	20.19	25.85	30.52	37.98	44.13	18.65	13.04	16.67	20.75	20.00
Olympic-Islands, WA Non-Metro	200	3.99	14.37	4.52	16.86	12.56	22.68	29.65	46.09	53.27	18.50	21.43	6.90	21.31	19.51
Spokane, WA MSA	567	11.31	18.88	7.27	18.97	17.91	22.97	31.38	39.18	43.44	13.86	13.51	9.24	18.30	13.43
Tacoma, WA MD	624	12.45	18.66	5.56	18.89	18.17	23.23	27.82	39.22	48.45	16.90	23.08	13.39	15.63	18.26
Wenatchee-East Wenatchee, WA MSA	148	2.95	19.86	6.12	19.12	11.56	21.01	33.33	40.01	48.98	11.59	0.00	10.00	15.79	11.29
Yakima, WA MSA	123	2.45	20.45	1.69	18.68	12.71	20.51	23.73	40.36	61.86	12.45	7.14	15.79	14.29	11.43

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 1.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WASHINGTON						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Seattle-Bellevue-Everett, WA MD	67,468	52.56	18.50	3.99	18.70	15.32	24.54	28.77	38.26	51.92	19.84	13.70	17.98	20.14	20.98
<b>Limited Review:</b>															
Bellingham, WA MSA	3,980	3.10	18.16	3.32	18.66	14.00	23.94	27.34	39.24	55.34	16.43	11.64	14.10	15.48	18.36
Bremerton-Silverdale, WA MSA	5,514	4.30	17.45	4.52	19.02	14.57	24.52	29.21	39.02	51.69	17.32	14.72	14.69	17.10	18.71
Centralia, WA Non-Metro	1,033	0.80	19.91	2.62	19.63	11.18	23.50	27.11	36.96	59.10	18.82	1.85	17.13	16.45	22.32
Ellensburg, WA Non-Metro	717	0.56	18.08	2.42	16.33	7.12	21.63	21.97	43.95	68.48	17.22	18.75	19.54	22.97	15.40
Kennewick-Pasco-Richland, WA MSA	5,259	4.10	20.23	3.64	18.40	13.72	21.76	25.43	39.61	57.21	21.84	21.69	22.73	20.10	22.46
Mount Vernon-Anacortes, WA MSA	2,773	2.16	18.11	3.62	18.93	13.54	23.36	27.16	39.60	55.68	21.08	21.05	21.02	18.86	22.37
Okanogan County, WA Non-Metro	736	0.57	27.59	5.68	20.88	13.30	22.80	28.85	28.73	52.17	25.15	18.92	15.84	30.83	27.23
Olympia, WA MSA	6,519	5.08	17.26	4.14	18.90	16.60	25.85	29.83	37.98	49.43	17.89	17.40	16.31	18.56	18.18
Olympic-Islands, WA Non-Metro	3,935	3.07	14.37	2.18	16.86	10.31	22.68	22.09	46.09	65.42	18.24	14.63	14.59	17.67	19.38
Spokane, WA MSA	9,317	7.26	18.88	5.36	18.97	16.27	22.97	26.85	39.18	51.53	19.41	15.35	16.64	17.69	21.97
Tacoma, WA MD	16,653	12.97	18.66	3.57	18.89	15.90	23.23	28.57	39.22	51.96	17.37	14.95	15.79	17.01	18.41
Wenatchee-East Wenatchee, WA MSA	2,264	1.76	19.86	4.53	19.12	16.21	21.01	25.71	40.01	53.55	20.66	20.22	24.53	22.16	19.08
Yakima, WA MSA	2,184	1.70	20.45	3.29	18.68	10.83	20.51	24.31	40.36	61.57	14.91	10.96	14.05	14.94	15.39

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 13.7% of loans originated and purchase by bank. Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES				Geography: WASHINGTON			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	40,504	62.06	68.13	72.62	95.35	2.61	2.04	18.58	29.89
<b>Limited Review:</b>									
Bellingham, WA MSA	2,022	3.10	71.93	72.26	92.83	4.55	2.62	13.49	24.32
Bremerton-Silverdale, WA MSA	2,282	3.50	72.40	74.89	94.87	2.59	2.54	17.85	27.76
Centralia, WA Non-Metro	551	0.84	71.57	72.23	94.74	3.63	1.63	15.82	26.81
Ellensburg, WA Non-Metro	555	0.85	71.92	77.66	95.32	3.78	0.90	23.27	33.51
Kennewick-Pasco-Richland, WA MSA	730	1.12	69.49	67.53	94.66	2.88	2.47	5.19	8.85
Mount Vernon-Anacortes, WA MSA	1,327	2.03	71.10	78.60	96.68	1.43	1.88	17.46	29.54
Okanogan County, WA Non-Metro	560	0.86	72.91	78.93	95.00	3.39	1.61	35.85	50.93
Olympia, WA MSA	1,585	2.43	70.43	71.61	94.51	2.78	2.71	12.18	18.45
Olympic-Islands, WA Non-Metro	2,565	3.93	74.70	83.63	97.00	1.99	1.01	20.27	32.49
Spokane, WA MSA	3,624	5.55	69.52	73.81	94.92	2.84	2.24	12.13	20.13
Tacoma, WA MD	6,329	9.70	72.08	73.14	94.91	2.59	2.50	14.93	23.77
Wenatchee-East Wenatchee, WA MSA	1,274	1.95	72.16	73.23	95.29	2.90	1.81	18.78	26.94
Yakima, WA MSA	1,361	2.09	69.74	68.77	93.24	4.11	2.65	13.22	21.56

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* 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 12.3% 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: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Seattle-Bellevue-Everett, WA MD	248	19.95	96.15	70.16	93.55	4.03	2.42	33.84	43.40
<b>Limited Review:</b>									
Bellingham, WA MSA	52	4.18	96.02	82.69	94.23	3.85	1.92	5.00	7.35
Bremerton-Silverdale, WA MSA	17	1.37	97.92	64.71	76.47	23.53	0.00	23.81	37.50
Centralia, WA Non-Metro	40	3.22	97.69	27.50	90.00	10.00	0.00	35.48	50.00
Ellensburg, WA Non-Metro	60	4.83	96.77	85.00	70.00	10.00	20.00	32.56	30.56
Kennewick-Pasco-Richland, WA MSA	40	3.22	92.94	47.50	97.50	0.00	2.50	4.18	4.41
Mount Vernon-Anacortes, WA MSA	27	2.17	94.08	92.59	100.00	0.00	0.00	12.31	19.44
Okanogan County, WA Non-Metro	170	13.68	96.12	92.35	81.76	11.76	6.47	40.18	45.24
Olympia, WA MSA	13	1.05	96.06	53.85	100.00	0.00	0.00	18.18	30.77
Olympic-Islands, WA Non-Metro	67	5.39	98.00	82.09	98.51	1.49	0.00	46.15	51.85
Spokane, WA MSA	82	6.60	97.14	84.15	89.02	10.98	0.00	27.59	26.03
Tacoma, WA MD	49	3.94	96.05	79.59	100.00	0.00	0.00	38.24	44.00
Wenatchee-East Wenatchee, WA MSA	171	13.76	95.72	81.87	96.49	2.34	1.17	35.33	37.98
Yakima, WA MSA	207	16.65	91.60	70.05	90.34	4.83	4.83	23.87	27.48

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 15.0% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: WASHINGTON		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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	35	32,632	161	45,697	196	78,330	67.15	0	0
<b>Limited Review:</b>									
Bellingham, WA MSA	2	128	8	45	10	173	0.15	0	0
Bremerton-Silverdale, WA MSA	0	0	3	10	3	10	0.01	0	0
Centralia, WA Non-Metro	0	0	1	2,352	1	2,352	2.02	0	0
Ellensburg, WA Non-Metro	0	0	0	0	0	0	0.00	0	0
Kennewick-Pasco-Richland, WA MSA	1	5,207	3	6,063	4	11,270	9.66	0	0
Mount Vernon-Anacortes, WA MSA	5	669	1	5	6	674	0.58	0	0
Okanogan County, WA Non-Metro	0	0	1	15	1	15	0.01	0	0
Olympia, WA MSA	1	2	1	1	2	2	0.00	0	0
Olympic-Islands, WA Non-Metro	1	332	3	7	4	339	0.29	0	0
Spokane, WA MSA	9	6,724	8	2,714	17	9,438	8.09	0	0
Tacoma, WA MD	4	2,740	13	1,509	17	4,249	3.64	0	0
Wenatchee-East Wenatchee, WA MSA	0	0	4	7,214	4	7,214	6.18	0	0
Yakima, WA MSA	3	569	3	15	6	584	0.50	0	0
<b>Statewide:</b>									
Washington Statewide	1	1,000	1	1,000	2	2,000	1.71	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: WASHINGTON				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
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 MD	71.47	79	55.63	10.13	20.25	45.57	24.05	0	1	0	0	-1	0	4.50	20.34	47.23	27.72		
<b>Limited Review:</b>																			
Bellingham, WA MSA	1.65	3	2.11	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.81	22.82	57.66	18.71		
Bremerton-Silverdale, WA MSA	1.93	6	4.23	0.00	50.00	33.33	16.67	0	1	0	0	-1	0	0.00	19.47	57.87	22.66		
Centralia, WA Non-Metro	0.55	2	1.41	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	17.36	69.81	12.82		
Ellensburg, WA Non-Metro	0.44	2	1.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	18.33	46.34	35.32		
Kennewick-Pasco-Richland, WA MSA	0.28	1	0.70	0.00	100.00	0.00	0.00	0	0	0	0	0	0	9.46	25.13	34.94	30.47		
Mount Vernon-Anacortes, WA MSA	1.17	3	2.11	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	12.79	69.18	18.03		
Okanogan County, WA Non-Metro	0.77	4	2.82	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	25.38	74.62	0.00		
Olympia, WA MSA	1.27	3	2.11	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.68	14.60	60.17	24.56		
Olympic-Islands, WA Non-Metro	2.64	9	6.34	0.00	11.11	55.56	33.33	0	0	0	0	0	0	0.84	8.43	53.23	37.51		
Spokane, WA MSA	4.24	7	4.93	0.00	57.14	42.86	0.00	0	0	0	0	0	0	3.56	26.18	39.63	30.63		
Tacoma, WA MD	9.86	14	9.86	14.29	21.43	42.86	21.43	0	0	0	0	0	0	2.52	22.24	50.77	24.47		
Wenatchee-East Wenatchee, WA MSA	1.87	5	3.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.78	73.72	16.50		
Yakima, WA MSA	1.86	4	2.82	50.00	0.00	25.00	25.00	0	0	0	0	0	0	4.13	34.16	34.40	27.32		

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: WISCONSIN								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Green Bay, WI MSA	11.14	8,709	1,338,867	3,090	149,866	96	3,973	5	6,763	11,900	1,499,469	10.04
La Crosse, WI MSA	3.27	1,959	311,518	1,506	86,332	25	1,009	1	200	3,491	399,059	8.03
Milwaukee-Waukesha-West Allis, WI MSA	40.26	37,226	7,210,863	5,768	213,744	31	629	5	19,494	43,030	7,444,730	39.97
Limited Review:												
Appleton, WI MSA	7.18	6,471	975,946	1,171	56,960	25	2,555	1	977	7,668	1,036,438	7.40
Baraboo, WI Non-Metro	1.86	1,480	233,443	473	16,509	35	1,843	0	0	1,988	251,795	1.51
Eau Claire, WI MSA	3.95	2,827	424,921	1,361	89,424	29	861	1	3,000	4,218	518,206	5.54
Fond du Lac, WI MSA	1.85	1,623	232,600	318	8,993	33	985	1	6,969	1,975	249,547	0.71
Madison, WI MSA	13.78	12,405	2,509,326	2,208	70,774	108	3,689	2	6,431	14,723	2,590,221	8.53
Manitowoc, WI Non-Metro	1.44	1,228	154,164	302	8,915	13	903	0	0	1,543	163,982	1.11
Marinette, WI Non-Metro	0.78	634	77,114	193	13,813	3	420	0	0	830	91,346	0.19
Northern WI Non-Metro	0.63	429	51,156	219	8,367	28	638	0	0	676	60,160	1.32
Oshkosh-Neenah, WI MSA	3.74	3,518	519,560	460	20,487	21	1,108	1	1,000	4,000	542,155	0.71
Racine, WI MSA	4.52	4,259	700,522	561	19,878	10	151	1	821	4,831	721,373	6.33
Sheboygan, WI MSA	3.86	2,835	401,716	1,237	57,779	49	3,020	4	1,175	4,125	463,690	8.01
Wausau, WI MSA	1.75	1,412	208,892	380	12,057	78	3,583	1	4,900	1,871	229,433	0.60

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Green Bay, WI MSA	2,004	9.08	0.00	0.00	12.53	10.48	68.81	67.47	18.66	22.06	18.38	0.00	19.20	18.33	18.21
La Crosse, WI MSA	495	2.24	0.00	0.00	11.09	9.29	75.06	74.55	13.85	16.16	7.91	0.00	6.72	6.98	13.26
Milwaukee-Waukesha-West Allis, WI MSA	9,484	42.99	4.46	1.68	12.07	8.40	46.58	48.91	36.88	41.01	17.29	18.22	17.63	17.98	16.42
<b>Limited Review:</b>															
Appleton, WI MSA	1,759	7.97	0.00	0.00	4.66	5.12	83.48	72.26	11.86	22.63	16.81	0.00	19.86	16.52	17.21
Baraboo, WI Non-Metro	311	1.41	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	15.63	0.00	0.00	15.63	0.00
Eau Claire, WI MSA	776	3.52	0.00	0.00	9.89	9.92	72.19	71.65	17.92	18.43	10.96	0.00	7.35	10.98	12.92
Fond du Lac, WI MSA	396	1.80	0.00	0.00	0.00	0.00	92.04	93.43	7.96	6.57	11.64	0.00	0.00	11.45	13.64
Madison, WI MSA	2,998	13.59	0.58	0.37	15.02	10.11	65.27	61.87	19.14	27.65	12.43	7.50	10.58	12.65	12.72
Manitowoc, WI Non-Metro	300	1.36	0.00	0.00	2.93	3.00	67.92	71.67	29.15	25.33	13.98	0.00	18.18	15.38	10.37
Marinette, WI Non-Metro	156	0.71	0.00	0.00	11.35	10.90	81.88	82.69	6.76	6.41	15.34	0.00	9.68	15.46	23.53
Northern WI Non-Metro	90	0.41	0.00	0.00	8.20	3.33	91.80	96.67	0.00	0.00	13.55	0.00	16.67	13.42	0.00
Oshkosh-Neenah, WI MSA	1,117	5.06	0.00	0.00	5.18	4.74	74.00	70.19	20.82	25.07	18.40	0.00	25.27	19.11	15.14
Racine, WI MSA	1,183	5.36	3.43	1.69	6.59	5.83	71.55	73.54	18.42	18.93	18.62	42.86	22.34	18.67	15.60
Sheboygan, WI MSA	561	2.54	0.00	0.00	10.78	9.09	75.94	72.73	13.28	18.18	15.96	0.00	17.98	16.22	13.89
Wausau, WI MSA	431	1.95	0.00	0.00	14.02	16.24	70.90	62.65	15.08	21.11	7.16	0.00	8.38	7.37	5.78

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT			Geography: WISCONSIN								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*					
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp	
Full Review:																
Green Bay, WI MSA	146	7.98	0.00	0.00	12.53	16.44	68.81	62.33	18.66	21.23	4.51	0.00	5.06	4.43	4.48	
La Crosse, WI MSA	50	2.73	0.00	0.00	11.09	12.00	75.06	74.00	13.85	14.00	4.26	0.00	8.11	2.39	11.11	
Milwaukee-Waukesha-West Allis, WI MSA	808	44.15	4.46	1.73	12.07	6.93	46.58	42.70	36.88	48.64	10.15	10.53	8.06	8.57	12.26	
Limited Review:																
Appleton, WI MSA	111	6.07	0.00	0.00	4.66	5.41	83.48	71.17	11.86	23.42	3.10	0.00	4.17	2.72	4.55	
Baraboo, WI Non-Metro	53	2.90	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	7.14	0.00	0.00	7.14	0.00	
Eau Claire, WI MSA	48	2.62	0.00	0.00	9.89	8.33	72.19	70.83	17.92	20.83	3.77	0.00	3.45	3.35	5.56	
Fond du Lac, WI MSA	43	2.35	0.00	0.00	0.00	0.00	92.04	95.35	7.96	4.65	4.57	0.00	0.00	4.59	4.35	
Madison, WI MSA	221	12.08	0.58	0.00	15.02	13.12	65.27	59.73	19.14	27.15	3.40	0.00	5.44	3.02	3.61	
Manitowoc, WI Non-Metro	57	3.11	0.00	0.00	2.93	1.75	67.92	61.40	29.15	36.84	6.87	0.00	0.00	7.24	6.76	
Marinette, WI Non-Metro	21	1.15	0.00	0.00	11.35	19.05	81.88	76.19	6.76	4.76	6.52	0.00	22.22	5.41	0.00	
Northern WI Non-Metro	20	1.09	0.00	0.00	8.20	5.00	91.80	95.00	0.00	0.00	7.55	0.00	20.00	6.25	0.00	
Oshkosh-Neenah, WI MSA	46	2.51	0.00	0.00	5.18	2.17	74.00	67.39	20.82	30.43	1.82	0.00	0.00	1.27	3.67	
Racine, WI MSA	90	4.92	3.43	2.22	6.59	4.44	71.55	63.33	18.42	30.00	12.43	25.00	12.50	7.08	23.08	
Sheboygan, WI MSA	92	5.03	0.00	0.00	10.78	8.70	75.94	72.83	13.28	18.48	4.37	0.00	3.64	4.55	4.17	
Wausau, WI MSA	24	1.31	0.00	0.00	14.02	8.33	70.90	70.83	15.08	20.83	2.35	0.00	0.00	2.36	4.26	

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Green Bay, WI MSA	6,550	10.38	0.00	0.00	12.53	8.56	68.81	64.81	18.66	26.63	14.15	0.00	16.07	13.65	14.91
La Crosse, WI MSA	1,413	2.24	0.00	0.00	11.09	4.88	75.06	73.89	13.85	21.23	7.35	0.00	5.95	7.18	8.66
Milwaukee-Waukesha-West Allis, WI MSA	26,927	42.68	4.46	1.03	12.07	5.13	46.58	42.76	36.88	51.08	14.59	14.70	15.54	14.14	14.87
<b>Limited Review:</b>															
Appleton, WI MSA	4,600	7.29	0.00	0.00	4.66	2.80	83.48	68.57	11.86	28.63	12.29	0.00	12.76	11.34	15.35
Baraboo, WI Non-Metro	1,115	1.77	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.57	0.00	0.00	14.57	0.00
Eau Claire, WI MSA	2,001	3.17	0.00	0.00	9.89	9.20	72.19	65.37	17.92	25.44	9.32	0.00	7.87	8.87	11.48
Fond du Lac, WI MSA	1,184	1.88	0.00	0.00	0.00	0.00	92.04	89.70	7.96	10.30	8.00	0.00	0.00	8.28	6.18
Madison, WI MSA	9,180	14.55	0.58	0.25	15.02	8.94	65.27	62.00	19.14	28.80	9.05	5.05	9.38	8.94	9.24
Manitowoc, WI Non-Metro	871	1.38	0.00	0.00	2.93	1.38	67.92	63.15	29.15	35.48	9.47	0.00	14.63	10.03	8.25
Marinette, WI Non-Metro	457	0.72	0.00	0.00	11.35	10.50	81.88	79.65	6.76	9.85	13.54	0.00	11.63	12.96	19.79
Northern WI Non-Metro	319	0.51	0.00	0.00	8.20	5.64	91.80	94.36	0.00	0.00	12.72	0.00	11.76	12.80	0.00
Oshkosh-Neenah, WI MSA	2,355	3.73	0.00	0.00	5.18	2.80	74.00	62.72	20.82	34.48	11.13	0.00	8.33	10.27	13.27
Racine, WI MSA	2,985	4.73	3.43	1.04	6.59	4.22	71.55	69.11	18.42	25.63	12.23	11.67	15.58	11.90	12.58
Sheboygan, WI MSA	2,181	3.46	0.00	0.00	10.78	7.02	75.94	69.92	13.28	23.06	13.75	0.00	12.61	13.67	14.32
Wausau, WI MSA	955	1.51	0.00	0.00	14.02	7.43	70.90	69.42	15.08	23.14	5.75	0.00	4.32	5.63	6.95

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Geographic Distribution: MULTIFAMILY			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Green Bay, WI MSA	9	29.03	0.00	0.00	22.26	22.22	70.14	66.67	7.60	11.11	3.64	0.00	10.00	2.94	0.00
La Crosse, WI MSA	1	3.23	0.00	0.00	43.47	0.00	54.78	100.00	1.75	0.00	0.00	0.00	0.00	0.00	0.00
Milwaukee-Waukesha-West Allis, WI MSA	7	22.58	12.61	28.57	19.46	28.57	48.14	14.29	19.79	28.57	0.69	2.63	0.00	0.00	2.00
<b>Limited Review:</b>															
Appleton, WI MSA	1	3.23	0.00	0.00	8.75	0.00	81.14	100.00	10.11	0.00	0.00	0.00	0.00	0.00	0.00
Baraboo, WI Non-Metro	1	3.23	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
Eau Claire, WI MSA	2	6.45	0.00	0.00	32.43	0.00	46.32	100.00	21.26	0.00	2.86	0.00	0.00	8.33	0.00
Fond du Lac, WI MSA	0	0.00	0.00	0.00	0.00	0.00	97.56	0.00	2.44	0.00	0.00	0.00	0.00	0.00	0.00
Madison, WI MSA	6	19.35	15.47	0.00	20.66	0.00	48.76	66.67	15.11	33.33	2.68	0.00	0.00	1.75	22.22
Manitowoc, WI Non-Metro	0	0.00	0.00	0.00	4.51	0.00	88.64	0.00	6.85	0.00	0.00	0.00	0.00	0.00	0.00
Marinette, WI Non-Metro	0	0.00	0.00	0.00	4.48	0.00	95.52	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Northern WI Non-Metro	0	0.00	0.00	0.00	2.53	0.00	97.47	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oshkosh-Neenah, WI MSA	0	0.00	0.00	0.00	8.86	0.00	76.30	0.00	14.84	0.00	0.00	0.00	0.00	0.00	0.00
Racine, WI MSA	1	3.23	3.26	0.00	24.26	100.00	57.04	0.00	15.44	0.00	0.00	0.00	0.00	0.00	0.00
Sheboygan, WI MSA	1	3.23	0.00	0.00	32.21	0.00	62.80	100.00	4.99	0.00	0.00	0.00	0.00	0.00	0.00
Wausau, WI MSA	2	6.45	0.00	0.00	28.01	0.00	59.37	100.00	12.62	0.00	0.00	0.00	0.00	0.00	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Green Bay, WI MSA	3,090	16.08	0.00	0.00	14.31	16.89	67.72	67.73	17.93	15.37	14.19	0.00	20.28	14.20	11.64
La Crosse, WI MSA	1,506	7.84	0.00	0.00	19.07	21.12	70.03	69.79	10.90	9.10	26.96	0.00	31.29	28.28	18.00
Milwaukee-Waukesha-West Allis, WI MSA	5,737	29.86	7.28	4.20	13.38	11.36	42.50	39.36	36.29	45.08	5.56	5.07	6.14	5.29	6.06
<b>Limited Review:</b>															
Appleton, WI MSA	1,171	6.09	0.00	0.00	8.36	17.08	74.47	64.30	17.17	18.62	8.89	0.00	23.08	7.93	8.53
Baraboo, WI Non-Metro	473	2.46	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.70	0.00	0.00	15.94	0.00
Eau Claire, WI MSA	1,361	7.08	0.00	0.00	17.37	21.82	67.99	57.31	14.63	20.87	17.03	0.00	25.79	14.32	20.39
Fond du Lac, WI MSA	318	1.65	0.00	0.00	0.00	0.00	94.18	97.48	5.82	2.52	4.80	0.00	0.00	5.27	2.29
Madison, WI MSA	2,208	11.49	3.48	1.40	13.95	10.24	62.42	62.00	20.15	26.36	6.73	8.11	4.99	6.90	7.81
Manitowoc, WI Non-Metro	302	1.57	0.00	0.00	2.81	0.99	69.56	63.58	27.63	35.43	8.50	0.00	3.13	8.50	10.66
Marinette, WI Non-Metro	193	1.00	0.00	0.00	6.14	4.66	89.65	88.60	4.21	6.74	11.85	0.00	2.50	14.11	16.67
Northern WI Non-Metro	219	1.14	0.00	0.00	5.06	4.11	94.94	95.89	0.00	0.00	21.48	0.00	20.00	23.33	0.00
Oshkosh-Neenah, WI MSA	460	2.39	0.00	0.00	6.26	5.22	71.43	56.96	22.31	37.83	6.01	0.00	6.60	5.44	7.99
Racine, WI MSA	561	2.92	5.48	9.98	9.76	9.63	68.49	65.78	16.26	14.62	5.12	6.84	7.76	4.83	4.95
Sheboygan, WI MSA	1,237	6.44	0.00	0.00	15.75	19.73	69.99	65.72	14.25	14.55	16.61	0.00	22.34	15.96	16.52
Wausau, WI MSA	380	1.98	0.00	0.00	18.08	15.26	61.89	72.89	20.03	11.84	3.72	0.00	3.06	4.68	2.54

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
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>															
Green Bay, WI MSA	96	16.44	0.00	0.00	11.32	32.29	78.37	59.38	10.31	8.33	7.60	0.00	42.11	4.15	25.00
La Crosse, WI MSA	25	4.28	0.00	0.00	1.94	4.00	86.41	92.00	11.65	4.00	28.57	0.00	0.00	31.58	0.00
Milwaukee-Waukesha-West Allis, WI MSA	31	5.31	2.34	0.00	5.62	0.00	49.43	45.16	42.52	54.84	7.06	0.00	0.00	4.92	13.04
<b>Limited Review:</b>															
Appleton, WI MSA	25	4.28	0.00	0.00	0.87	0.00	89.61	92.00	9.51	8.00	2.76	0.00	0.00	2.87	0.00
Baraboo, WI Non-Metro	35	5.99	0.00	0.00	0.00	0.00	100.00	100.00	0.00	0.00	14.47	0.00	0.00	14.67	0.00
Eau Claire, WI MSA	29	4.97	0.00	0.00	7.37	0.00	77.37	72.41	15.25	27.59	5.50	0.00	0.00	3.96	28.57
Fond du Lac, WI MSA	33	5.65	0.00	0.00	0.00	0.00	90.84	96.97	9.16	3.03	3.14	0.00	0.00	2.84	7.69
Madison, WI MSA	108	18.49	0.45	0.00	14.02	12.96	70.75	62.96	14.77	24.07	9.59	0.00	4.35	8.15	27.03
Manitowoc, WI Non-Metro	13	2.23	0.00	0.00	0.45	0.00	56.53	84.62	43.03	15.38	5.88	0.00	0.00	3.33	10.00
Marinette, WI Non-Metro	3	0.51	0.00	0.00	7.14	0.00	86.73	100.00	6.12	0.00	8.33	0.00	0.00	8.57	0.00
Northern WI Non-Metro	28	4.79	0.00	0.00	8.88	0.00	91.12	100.00	0.00	0.00	24.00	0.00	0.00	27.27	0.00
Oshkosh-Neenah, WI MSA	21	3.60	0.00	0.00	2.04	0.00	80.00	80.95	17.96	19.05	9.43	0.00	0.00	10.26	7.14
Racine, WI MSA	10	1.71	1.11	10.00	3.15	0.00	72.78	50.00	22.96	40.00	2.70	0.00	0.00	2.13	3.70
Sheboygan, WI MSA	49	8.39	0.00	0.00	1.79	0.00	83.93	100.00	14.29	0.00	12.38	0.00	0.00	13.54	0.00
Wausau, WI MSA	78	13.36	0.00	0.00	12.12	12.82	77.63	82.05	10.25	5.13	10.00	0.00	15.38	9.71	7.14

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Green Bay, WI MSA	2,004	9.08	16.46	14.48	19.20	30.40	27.30	25.44	37.04	29.68	18.74	21.07	19.35	16.93	18.53
La Crosse, WI MSA	495	2.24	16.24	6.90	19.83	27.41	26.51	27.82	37.43	37.87	7.86	3.65	10.37	8.00	7.25
Milwaukee-Waukesha-West Allis, WI MSA	9,484	42.99	19.84	8.27	17.89	24.85	23.61	26.89	38.65	39.99	17.91	17.68	17.92	17.64	18.14
<b>Limited Review:</b>															
Appleton, WI MSA	1,759	7.97	13.81	16.46	20.05	29.58	30.79	24.66	35.34	29.29	16.94	16.05	15.21	15.29	20.99
Baraboo, WI Non-Metro	311	1.41	14.10	8.05	17.53	24.16	28.09	29.87	40.29	37.92	15.43	13.21	10.60	15.38	19.35
Eau Claire, WI MSA	776	3.52	16.25	11.58	20.21	28.23	26.25	31.69	37.29	28.50	10.39	8.42	11.98	11.26	9.15
Fond du Lac, WI MSA	396	1.80	14.43	18.32	18.74	29.58	31.55	28.01	35.27	24.08	11.14	14.81	9.71	11.96	9.74
Madison, WI MSA	2,998	13.59	16.01	10.07	19.36	26.61	28.49	29.36	36.14	33.97	13.78	13.48	12.87	14.81	13.78
Manitowoc, WI Non-Metro	300	1.36	12.60	10.60	16.87	28.62	26.13	26.86	44.40	33.92	12.09	13.41	14.37	11.28	9.16
Marinette, WI Non-Metro	156	0.71	19.04	15.54	22.47	23.65	25.83	24.32	32.65	36.49	14.46	15.38	12.35	13.64	15.87
Northern WI Non-Metro	90	0.41	22.82	22.09	22.00	24.42	26.16	17.44	29.02	36.05	11.89	10.00	14.29	3.85	15.38
Oshkosh-Neenah, WI MSA	1,117	5.06	15.68	14.48	19.70	28.13	28.02	26.46	36.60	30.92	18.48	17.31	18.18	16.24	21.01
Racine, WI MSA	1,183	5.36	17.83	12.06	18.46	29.63	25.73	25.61	37.98	32.69	18.96	19.82	22.08	18.16	16.37
Sheboygan, WI MSA	561	2.54	14.72	10.65	19.38	25.61	29.30	27.85	36.60	35.89	16.59	14.17	15.36	16.67	19.17
Wausau, WI MSA	431	1.95	15.30	17.43	19.58	29.54	28.61	29.30	36.51	23.73	6.73	6.05	8.38	6.43	5.80

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.3% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Green Bay, WI MSA	146	7.98	16.46	7.04	19.20	19.72	27.30	31.69	37.04	41.55	4.70	1.25	4.00	5.21	5.91
La Crosse, WI MSA	50	2.73	16.24	6.25	19.83	27.08	26.51	27.08	37.43	39.58	4.48	4.17	3.77	2.47	6.98
Milwaukee-Waukesha-West Allis, WI MSA	808	44.15	19.84	5.58	17.89	16.35	23.61	27.88	38.65	50.19	10.61	9.23	7.81	7.91	13.99
<b>Limited Review:</b>															
Appleton, WI MSA	111	6.07	13.81	11.01	20.05	25.69	30.79	28.44	35.34	34.86	3.15	3.88	4.30	3.07	2.17
Baraboo, WI Non-Metro	53	2.90	14.10	3.85	17.53	21.15	28.09	40.38	40.29	34.62	6.72	0.00	4.35	13.95	3.45
Eau Claire, WI MSA	48	2.62	16.25	8.51	20.21	21.28	26.25	29.79	37.29	40.43	3.94	2.70	3.23	4.00	4.76
Fond du Lac, WI MSA	43	2.35	14.43	13.95	18.74	18.60	31.55	27.91	35.27	39.53	4.83	15.00	2.17	3.70	5.00
Madison, WI MSA	221	12.08	16.01	11.36	19.36	25.00	28.49	23.64	36.14	40.00	3.41	3.13	2.41	3.51	3.98
Manitowoc, WI Non-Metro	57	3.11	12.60	7.41	16.87	11.11	26.13	29.63	44.40	51.85	5.73	9.09	3.45	4.26	7.00
Marinette, WI Non-Metro	21	1.15	19.04	4.76	22.47	23.81	25.83	38.10	32.65	33.33	6.67	0.00	12.00	4.17	6.67
Northern WI Non-Metro	20	1.09	22.82	21.05	22.00	26.32	26.16	31.58	29.02	21.05	7.69	11.11	5.56	8.33	7.69
Oshkosh-Neenah, WI MSA	46	2.51	15.68	4.44	19.70	8.89	28.02	26.67	36.60	60.00	1.63	0.00	2.20	0.00	2.53
Racine, WI MSA	90	4.92	17.83	10.23	18.46	20.45	25.73	22.73	37.98	46.59	11.70	0.00	14.29	6.52	16.18
Sheboygan, WI MSA	92	5.03	14.72	11.11	19.38	23.33	29.30	20.00	36.60	45.56	4.21	5.77	3.09	3.03	5.69
Wausau, WI MSA	24	1.31	15.30	16.67	19.58	12.50	28.61	25.00	36.51	45.83	2.47	1.92	0.00	1.18	5.41

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 2.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WISCONSIN						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Green Bay, WI MSA	6,550	10.38	16.46	5.53	19.20	18.13	27.30	26.68	37.04	49.66	14.69	9.67	14.03	13.74	16.61
La Crosse, WI MSA	1,413	2.24	16.24	4.12	19.83	15.36	26.51	25.14	37.43	55.38	7.06	3.38	5.78	5.18	9.70
Milwaukee-Waukesha-West Allis, WI MSA	26,927	42.68	19.84	3.45	17.89	14.38	23.61	25.71	38.65	56.46	15.52	11.42	12.33	14.38	17.60
<b>Limited Review:</b>															
Appleton, WI MSA	4,600	7.29	13.81	5.62	20.05	18.59	30.79	27.71	35.34	48.08	12.20	9.14	10.60	10.84	14.80
Baraboo, WI Non-Metro	1,115	1.77	14.10	3.08	17.53	16.94	28.09	26.18	40.29	53.80	14.01	5.06	15.15	13.93	14.55
Eau Claire, WI MSA	2,001	3.17	16.25	4.91	20.21	17.77	26.25	27.77	37.29	49.54	8.80	6.88	6.54	8.61	10.33
Fond du Lac, WI MSA	1,184	1.88	14.43	6.04	18.74	21.03	31.55	28.67	35.27	44.27	6.91	6.64	6.70	6.99	7.05
Madison, WI MSA	9,180	14.55	16.01	5.57	19.36	18.80	28.49	28.53	36.14	47.11	9.53	9.49	8.34	8.91	10.53
Manitowoc, WI Non-Metro	871	1.38	12.60	4.74	16.87	15.29	26.13	29.36	44.40	50.61	8.82	11.29	5.70	9.75	9.11
Marinette, WI Non-Metro	457	0.72	19.04	7.30	22.47	18.25	25.83	28.95	32.65	45.50	14.27	17.19	9.32	15.61	15.21
Northern WI Non-Metro	319	0.51	22.82	8.57	22.00	17.14	26.16	31.43	29.02	42.86	12.22	3.92	5.88	18.75	14.12
Oshkosh-Neenah, WI MSA	2,355	3.73	15.68	4.90	19.70	16.04	28.02	25.35	36.60	53.71	10.66	8.23	8.51	8.11	12.89
Racine, WI MSA	2,985	4.73	17.83	4.93	18.46	18.26	25.73	27.91	37.98	48.91	12.21	10.86	11.86	10.84	13.46
Sheboygan, WI MSA	2,181	3.46	14.72	6.05	19.38	22.50	29.30	31.28	36.60	40.16	15.03	16.98	14.98	15.22	14.48
Wausau, WI MSA	955	1.51	15.30	6.89	19.58	21.05	28.61	28.45	36.51	43.61	5.50	5.08	4.34	5.12	6.60

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 11.2% of loans originated and purchase by bank.  
Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: WISCONSIN				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*		
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less	
<b>Full Review:</b>										
Green Bay, WI MSA	3,090	16.05	68.39	68.64	90.91	5.47	3.62	14.19	20.74	
La Crosse, WI MSA	1,506	7.82	69.42	61.42	90.31	4.91	4.78	26.96	35.56	
Milwaukee-Waukesha-West Allis, WI MSA	5,768	29.97	66.45	75.12	95.56	2.95	1.49	5.56	9.74	
<b>Limited Review:</b>										
Appleton, WI MSA	1,171	6.08	71.16	70.62	91.80	4.36	3.84	8.89	15.15	
Baraboo, WI Non-Metro	473	2.46	71.36	79.70	95.77	2.54	1.69	14.70	24.93	
Eau Claire, WI MSA	1,361	7.07	72.30	61.72	86.85	7.13	6.02	17.03	25.22	
Fond du Lac, WI MSA	318	1.65	72.28	73.58	97.48	0.63	1.89	4.80	6.47	
Madison, WI MSA	2,208	11.47	66.40	77.45	96.74	2.31	0.95	6.73	11.72	
Manitowoc, WI Non-Metro	302	1.57	71.00	82.12	97.35	0.99	1.66	8.50	17.20	
Marinette, WI Non-Metro	193	1.00	71.44	63.21	89.12	3.11	7.77	11.85	16.16	
Northern WI Non-Metro	219	1.14	77.12	81.74	93.61	5.48	0.91	21.48	34.31	
Oshkosh-Neenah, WI MSA	460	2.39	68.32	65.87	92.83	4.35	2.83	6.01	10.07	
Racine, WI MSA	561	2.91	68.22	77.18	95.19	2.85	1.96	5.12	9.03	
Sheboygan, WI MSA	1,237	6.43	69.63	71.79	92.72	3.96	3.31	16.61	23.82	
Wausau, WI MSA	380	1.97	72.76	75.53	96.58	2.37	1.05	3.72	5.32	

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2011).

\*\*\*\* Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 11.1% 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, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Green Bay, WI MSA	96	16.44	97.98	60.42	91.67	7.29	1.04	7.60	7.41
La Crosse, WI MSA	25	4.28	98.06	84.00	96.00	0.00	4.00	28.57	27.78
Milwaukee-Waukesha-West Allis, WI MSA	31	5.31	95.61	100.00	96.77	3.23	0.00	7.06	15.00
<b>Limited Review:</b>									
Appleton, WI MSA	25	4.28	97.09	64.00	80.00	4.00	16.00	2.76	1.44
Baraboo, WI Non-Metro	35	5.99	98.58	77.14	100.00	0.00	0.00	14.47	16.07
Eau Claire, WI MSA	29	4.97	98.79	68.97	100.00	0.00	0.00	5.50	5.56
Fond du Lac, WI MSA	33	5.65	96.90	66.67	96.97	3.03	0.00	3.14	3.03
Madison, WI MSA	108	18.49	97.49	80.56	95.37	4.63	0.00	9.59	11.83
Manitowoc, WI Non-Metro	13	2.23	97.48	61.54	92.31	0.00	7.69	5.88	8.82
Marinette, WI Non-Metro	3	0.51	98.47	100.00	33.33	66.67	0.00	8.33	15.00
Northern WI Non-Metro	28	4.79	98.07	82.14	100.00	0.00	0.00	24.00	27.78
Oshkosh-Neenah, WI MSA	21	3.60	97.78	100.00	95.24	4.76	0.00	9.43	13.89
Racine, WI MSA	10	1.71	97.22	100.00	100.00	0.00	0.00	2.70	3.51
Sheboygan, WI MSA	49	8.39	95.31	91.84	93.88	0.00	6.12	12.38	14.46
Wausau, WI MSA	78	13.36	98.84	85.90	87.18	10.26	2.56	10.00	11.83

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2011).

\*\*\*\* 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 8.9% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: WISCONSIN		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Green Bay, WI MSA	2	488	9	9,061	11	9,549	10.63	0	0
La Crosse, WI MSA	1	45	9	4,300	10	4,345	4.84	1	59
Milwaukee-Waukesha-West Allis, WI MSA	22	28,858	88	20,668	110	49,526	55.15	0	0
<b>Limited Review:</b>									
Appleton, WI MSA	1	980	3	582	4	1,561	1.74	0	0
Baraboo, WI Non-Metro	0	0	3	26	3	26	0.03	0	0
Eau Claire, WI MSA	2	552	1	1	3	553	0.62	0	0
Fond du Lac, WI MSA	3	578	2	25	5	603	0.67	0	0
Madison, WI MSA	3	872	9	9,602	12	10,474	11.66	0	0
Manitowoc, WI Non-Metro	1	1	1	990	2	991	1.10	0	0
Marinette, WI Non-Metro	0	0	2	118	2	118	0.13	0	0
Northern WI Non-Metro	0	0	1	0	1	0	0.00	0	0
Oshkosh-Neenah, WI MSA	0	0	6	305	6	305	0.34	0	0
Racine, WI MSA	1	1,057	4	504	5	1,561	1.74	0	0
Sheboygan, WI MSA	1	165	6	811	7	977	1.09	0	0
Wausau, WI MSA	0	0	2	7,411	2	7,411	8.25	0	0
<b>Statewide:</b>									
Wisconsin Statewide	2	1,803	0	0	2	1,803	2.01	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	
Geography: WASHINGTON																	
Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012																	
MA/Assessment Area:	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				# of Branch Openings	# of Branch Closings	Branch Openings/Closings				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)						Net change in Location of Branches (+ or - )				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
Seattle-Bellevue-Everett, WA MD	71.47	79	55.63	10.13	20.25	45.57	24.05	0	1	0	0	-1	0	4.50	20.34	47.23	27.72
Limited Review:																	
Bellingham, WA MSA	1.65	3	2.11	0.00	0.00	66.67	33.33	0	0	0	0	0	0	0.81	22.82	57.66	18.71
Bremerton-Silverdale, WA MSA	1.93	6	4.23	0.00	50.00	33.33	16.67	0	1	0	0	-1	0	0.00	19.47	57.87	22.66
Centralia, WA Non-Metro	0.55	2	1.41	0.00	50.00	50.00	0.00	0	0	0	0	0	0	0.00	17.36	69.81	12.82
Ellensburg, WA Non-Metro	0.44	2	1.41	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	18.33	46.34	35.32
Kennewick-Pasco-Richland, WA MSA	0.28	1	0.70	0.00	100.00	0.00	0.00	0	0	0	0	0	0	9.46	25.13	34.94	30.47
Mount Vernon-Anacortes, WA MSA	1.17	3	2.11	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.00	12.79	69.18	18.03
Okanogan County, WA Non-Metro	0.77	4	2.82	0.00	25.00	75.00	0.00	0	0	0	0	0	0	0.00	25.38	74.62	0.00
Olympia, WA MSA	1.27	3	2.11	0.00	66.67	33.33	0.00	0	0	0	0	0	0	0.68	14.60	60.17	24.56
Olympic-Islands, WA Non-Metro	2.64	9	6.34	0.00	11.11	55.56	33.33	0	0	0	0	0	0	0.84	8.43	53.23	37.51
Spokane, WA MSA	4.24	7	4.93	0.00	57.14	42.86	0.00	0	0	0	0	0	0	3.56	26.18	39.63	30.63
Tacoma, WA MD	9.86	14	9.86	14.29	21.43	42.86	21.43	0	0	0	0	0	0	2.52	22.24	50.77	24.47
Wenatchee-East Wenatchee, WA MSA	1.87	5	3.52	0.00	0.00	100.00	0.00	0	0	0	0	0	0	0.00	9.78	73.72	16.50
Yakima, WA MSA	1.86	4	2.82	50.00	0.00	25.00	25.00	0	0	0	0	0	0	4.13	34.16	34.40	27.32

**Table 1. Lending Volume**

LENDING VOLUME												
Geography: WYOMING												
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011												
MA/Assessment Area:	% of Rated Area Loans (#) in MA/AA*	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans**		Total Reported Loans		% of Rated Area Deposits in MA/AA***
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	
Full Review:												
Western WY Non-Metro	39.83	5,747	1,277,029	2,716	184,322	257	21,097	8	2,866	8,728	1,485,314	57.04
Limited Review:												
Casper, WY MSA	18.03	2,263	401,604	1,654	104,420	34	1,562	1	105	3,952	507,692	20.00
Cheyenne, WY MSA	22.36	3,455	645,045	1,372	47,785	72	3,640	2	1,100	4,901	697,570	13.26
Eastern WY Non-Metro	19.78	3,024	556,252	1,236	62,934	72	7,407	2	1,669	4,334	628,261	9.70

\* Loan Data as of December 31, 2011. Rated area refers to either state or multi-state MA rating area.

\*\* The evaluation period for Community Development Loans is from October 1, 2008 to December 31, 2012.

\*\*\* Deposit Data as of December 31, 2012. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

**Table 2. Geographic Distribution of Home Purchase Loans**

Geographic Distribution: HOME PURCHASE			Geography: WYOMING				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011								
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Western WY Non-Metro	2,052	39.83	0.00	0.00	9.40	4.63	70.45	77.68	20.15	17.69	24.33	0.00	19.66	25.47	22.70
<b>Limited Review:</b>															
Casper, WY MSA	894	17.35	0.00	0.00	18.11	16.33	59.40	60.96	22.49	22.71	14.29	0.00	12.93	14.84	13.51
Cheyenne, WY MSA	1,149	22.30	0.00	0.00	23.38	14.71	51.37	53.96	25.25	31.33	13.21	0.00	10.03	13.96	13.64
Eastern WY Non-Metro	1,057	20.52	0.06	0.00	2.59	1.42	78.53	64.81	18.83	33.77	12.75	0.00	11.11	12.61	13.17

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 3. Geographic Distribution of Home Improvement Loans**

Geographic Distribution: HOME IMPROVEMENT				Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011					
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Western WY Non-Metro	258	45.50	0.00	0.00	9.40	6.59	70.45	70.16	20.15	23.26	15.48	0.00	13.33	12.97	28.21
Limited Review:															
Casper, WY MSA	98	17.28	0.00	0.00	18.11	13.27	59.40	54.08	22.49	32.65	13.79	0.00	22.22	10.47	15.63
Cheyenne, WY MSA	80	14.11	0.00	0.00	23.38	15.00	51.37	43.75	25.25	41.25	8.41	0.00	5.56	10.09	7.41
Eastern WY Non-Metro	131	23.10	0.06	0.00	2.59	0.00	78.53	82.44	18.83	17.56	13.36	0.00	0.00	14.79	11.43

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 4. Geographic Distribution of Home Mortgage Refinance Loans**

Geographic Distribution: HOME MORTGAGE REFINANCE				Geography: WYOMING				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% Owner Occ Units***	% BANK Loans****	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Western WY Non-Metro	3,434	39.24	0.00	0.00	9.40	3.76	70.45	67.18	20.15	29.06	24.88	0.00	19.85	23.37	29.07
<b>Limited Review:</b>															
Casper, WY MSA	1,265	14.45	0.00	0.00	18.11	12.57	59.40	57.31	22.49	30.12	21.47	0.00	16.88	20.80	25.07
Cheyenne, WY MSA	2,224	25.41	0.00	0.00	23.38	11.38	51.37	49.01	25.25	39.61	20.84	0.00	19.73	21.36	20.43
Eastern WY Non-Metro	1,829	20.90	0.06	0.00	2.59	0.60	78.53	64.35	18.83	35.05	16.93	0.00	0.00	16.49	18.76

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

\*\*\* Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

\*\*\*\* Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 5. Geographic Distribution of Multifamily Loans**

Table 3: Geographic Distribution of Multifamily Loans															
Geographic Distribution: MULTIFAMILY			Geography: WYOMING								Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011				
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography*				
	#	% of Total**	% MF Units***	% BANK Loans****	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
Western WY Non-Metro	3	16.67	0.00	0.00	8.72	0.00	55.46	33.33	35.82	66.67	20.00	0.00	0.00	0.00	100.00
Limited Review:															
Casper, WY MSA	6	33.33	0.00	0.00	40.92	50.00	25.76	16.67	33.32	33.33	60.00	0.00	0.00	33.33	100.00
Cheyenne, WY MSA	2	11.11	0.00	0.00	30.90	100.00	51.48	0.00	17.61	0.00	0.00	0.00	0.00	0.00	0.00
Eastern WY Non-Metro	7	38.89	5.43	0.00	7.23	0.00	79.24	85.71	8.10	14.29	22.22	0.00	0.00	30.77	0.00

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

\*\*\* Percentage of Multi Family Units is the number of multi family housing units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

\*\*\*\* Multifamily loan distribution includes Home Purchases, Home Improvement, and Refinances.

**Table 6. Geographic Distribution of Small Loans to Businesses**

Geographic Distribution: Small Loans to Businesses				Geography: WYOMING				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Western WY Non-Metro	2,716	38.92	0.00	0.00	7.50	8.36	63.03	66.94	29.47	24.71	27.59	0.00	26.52	30.59	28.53
<b>Limited Review:</b>															
Casper, WY MSA	1,654	23.70	0.00	0.00	32.56	33.56	48.80	47.70	18.64	18.74	20.63	0.00	19.40	23.78	19.80
Cheyenne, WY MSA	1,372	19.66	0.00	0.00	39.51	49.49	39.95	33.38	20.54	17.13	23.21	0.00	29.59	18.13	19.01
Eastern WY Non-Metro	1,236	17.71	0.99	0.40	2.67	1.46	80.18	75.57	16.16	22.57	17.82	47.37	6.52	19.11	16.95

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 7. Geographic Distribution of Small Loans to Farms**

Geographic Distribution: Small Loans to Farms				Geography: WYOMING				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
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>															
Western WY Non-Metro	257	59.08	0.00	0.00	4.77	12.06	80.34	80.16	14.89	7.78	37.12	0.00	30.77	37.35	50.00
<b>Limited Review:</b>															
Casper, WY MSA	34	7.82	0.00	0.00	23.26	14.71	60.47	38.24	16.28	47.06	24.14	0.00	66.67	15.56	42.86
Cheyenne, WY MSA	72	16.55	0.00	0.00	15.52	2.78	57.76	34.72	26.72	62.50	38.78	0.00	100.00	26.67	55.56
Eastern WY Non-Metro	72	16.55	0.24	0.00	0.48	0.00	89.00	68.06	10.29	31.94	12.08	0.00	0.00	11.61	14.71

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small Loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Source Data - Dun and Bradstreet (2011).

**Table 8. Borrower Distribution of Home Purchase Loans**

Borrower Distribution: HOME PURCHASE															
Geography: WYOMING															
Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011															
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
Full Review:															
Western WY Non-Metro	2,052	39.83	17.57	4.17	18.08	19.41	23.03	32.83	41.33	43.59	24.52	17.20	20.38	26.71	26.49
Limited Review:															
Casper, WY MSA	894	17.35	19.04	5.70	19.09	26.43	23.45	32.71	38.43	35.16	15.48	10.43	14.86	17.06	16.15
Cheyenne, WY MSA	1,149	22.30	17.14	8.66	19.99	26.88	24.55	29.11	38.32	35.36	14.12	10.59	15.56	13.64	14.24
Eastern WY Non-Metro	1,057	20.52	18.56	3.71	17.55	18.24	22.87	35.12	41.03	42.93	13.57	15.00	10.30	13.13	16.33

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 3.1% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 9. Borrower Distribution of Home Improvement Loans**

Borrower Distribution: HOME IMPROVEMENT		Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Western WY Non-Metro	258	45.50	17.57	3.50	18.08	13.23	23.03	30.35	41.33	52.92	16.44	17.65	13.51	16.67	17.20
<b>Limited Review:</b>															
Casper, WY MSA	98	17.28	19.04	6.12	19.09	13.27	23.45	24.49	38.43	56.12	14.93	0.00	17.86	17.65	14.06
Cheyenne, WY MSA	80	14.11	17.14	10.00	19.99	16.25	24.55	25.00	38.32	48.75	8.88	6.25	12.50	8.70	8.04
Eastern WY Non-Metro	131	23.10	18.56	3.85	17.55	13.08	22.87	29.23	41.03	53.85	13.73	11.11	2.63	18.87	15.38

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* 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 based on 2000 Census information.

\*\*\*\* As a percentage of loans with borrower income information available. No information was available for 0.4% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 10. Borrower Distribution of Home Mortgage Refinance Loans**

Borrower Distribution: HOME MORTGAGE REFINANCE			Geography: WYOMING						Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share*				
	#	% of Total**	% Families***	% BANK Loans****	% Families	% BANK Loans****	% Families***	% BANK Loans****	% Families***	% BANK Loans****	Overall	Low	Mod	Mid	Upp
<b>Full Review:</b>															
Western WY Non-Metro	3,434	39.24	17.57	3.04	18.08	12.20	23.03	26.31	41.33	58.45	25.80	19.17	21.48	22.90	29.07
<b>Limited Review:</b>															
Casper, WY MSA	1,265	14.45	19.04	4.38	19.09	15.83	23.45	26.48	38.43	53.31	22.00	13.95	20.21	20.73	24.76
Cheyenne, WY MSA	2,224	25.41	17.14	4.33	19.99	15.86	24.55	29.63	38.32	50.18	18.61	9.77	16.56	19.71	19.94
Eastern WY Non-Metro	1,829	20.90	18.56	3.00	17.55	11.71	22.87	28.82	41.03	56.47	18.53	11.27	13.75	19.75	19.78

\* Based on 2011 Peer Mortgage Data (USPR)

\*\* Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

\*\*\* Percentage of Families based on 2000 Census information.

\*\* As a percentage of loans with borrower income information available. No information was available for 14.0% of loans originated and purchase by bank.

Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

**Table 11. Borrower Distribution of Small Loans to Businesses**

Borrower Distribution: SMALL LOANS TO BUSINESSES			Geography: WYOMING			Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share*	
	#	% of Total**	% of Businesses***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Western WY Non-Metro	2,716	38.92	66.97	64.91	87.04	6.66	6.30	27.59	40.32
<b>Limited Review:</b>									
Casper, WY MSA	1,654	23.70	68.10	67.71	89.54	4.66	5.80	20.63	30.29
Cheyenne, WY MSA	1,372	19.66	66.07	72.59	96.06	2.41	1.53	23.21	35.72
Eastern WY Non-Metro	1,236	17.71	68.57	72.33	90.70	4.45	4.85	17.82	26.90

\* Based on 2011 Small Business Data (USPR)

\*\* Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

\*\*\* Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&amp;B - 2011).

\*\*\*\* 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 13.2% 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: WYOMING				Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2011		
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share*	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
<b>Full Review:</b>									
Western WY Non-Metro	257	59.08	97.33	68.09	73.54	20.23	6.23	37.12	36.42
<b>Limited Review:</b>									
Casper, WY MSA	34	7.82	96.51	61.76	88.24	11.76	0.00	24.14	19.15
Cheyenne, WY MSA	72	16.55	96.95	81.94	88.89	11.11	0.00	38.78	44.74
Eastern WY Non-Metro	72	16.55	97.73	76.39	76.39	12.50	11.11	12.08	12.04

\* Based on 2011 Peer Small Business Data (USPR)

\*\* Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

\*\*\* Farms with revenues of \$1 million or less as a percentage of all farms (Source D&amp;B - 2011).

\*\*\*\* 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 22.1% of small loans to farms originated and purchased by the bank.

**Table 14. Qualified Investments**

QUALIFIED INVESTMENTS		Geography: WYOMING		Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2012					
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>									
Western WY Non-Metro	4	781	11	5,955	16	6,736	28.67	0	0
<b>Limited Review:</b>									
Casper, WY MSA	3	7,278	6	4,886	9	12,163	51.77	1	40
Cheyenne, WY MSA	1	806	11	60	12	865	3.68	0	0
Eastern WY Non-Metro	3	1,159	6	2,570	9	3,729	15.87	0	0
<b>Statewide:</b>									
Wyoming Statewide	0	0	0	0	0	0	0.00	0	0

\* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

\*\* 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

**Table 15. Distribution of Branch Delivery System and Branch Openings/Closings**

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS																	Geography: WYOMING				Evaluation Period: OCTOBER 1, 2008 TO DECEMBER 31, 2012							
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>																												
Western WY Non-Metro	57.04	15	53.57	0.00	13.33	66.67	20.00	1	4	0	0	-3	0	0.00	12.90	62.47	24.64											
<b>Limited Review:</b>																												
Casper, WY MSA	20.00	5	17.86	0.00	60.00	40.00	0.00	0	0	0	0	0	0	0.00	17.48	54.75	27.76											
Cheyenne, WY MSA	13.26	2	7.14	0.00	100.00	0.00	0.00	0	0	0	0	0	0	0.00	28.98	49.89	21.13											
Eastern WY Non-Metro	9.70	6	21.43	16.67	33.33	50.00	0.00	0	0	0	0	0	0	2.11	16.33	63.32	18.24											

## Appendix E: Tables of Lending Activity Performance Data

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Allentown-Bethlehem-Easton, PA-NJ MSA (FS)	Full Scope	23.22	1	25.17	1	9.1	2	21.29	1	13.34	2	29.55	1
Augusta-Richmond County, GA-SC MSA (FS)	Full Scope	20.90	1	23.93	1	25.1	1	24.97	1	12.57	2	6.61	6
Charlotte-Gastonia-Rock Hill, NC-SC MSA (FS)	Full Scope	12.82	2	22.06	1	19.32	2	22.67	1	16.27	2	16	2
Columbus, GA-AL MSA (FS)	Full Scope	11.11	3	24.14	1	20.98	2	19.31	1	13.45	3	9.52	3
Davenport-Moline-Rock Island, IA-IL MSA (FS)	Full Scope	16.00	1	12.51	1	7.46	4	12.54	1	26.79	1	24.79	3
Fargo, ND-MN MSA (FS)	Full Scope	14.61	2	19.5	1	12.24	3	25.41	1	16.08	3	23.67	2
Grand Forks, ND-MN MSA (FS)	Full Scope	5.31	7	20.08	1	5.99	3	15.97	1	9.71	4	2.05	4
Logan, UT-ID MSA (FS)	Full Scope	16.66	4	11.35	2	12.37	3	14.53	1	22.62	1	32.56	1
Memphis, TN-MS MSA (FS)	Full Scope	2.02	8	19.21	1	8.54	2	20.63	1	3.17	9	5.22	7
Minneapolis-St. Paul-Bloomington, MN-WI MSA (FS)	Full Scope	50.05	1	26.88	1	25.64	1	27.29	1	32.6	1	40.26	1
<b>NEW YORK-WHITE PLAINS-WAYNE, NY-NJ MD</b>													
New York-White Plains-Wayne, NY-NJ MD (FS)	Full Scope	2.18	9	24.45	1	16.75	1	17.24	1	3.8	6	15.43	2
Newark-Union, NJ-PA MD (FS)	Full Scope	16.18	1	23.77	1	13.69	1	20.77	1	9.45	3	19.3	2

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Omaha-Council Bluffs, NE-IA MSA (FS)	Full Scope	12.73	3	23.43	1	11.41	3	19.48	1	18.89	1	8.8	4
Portland-Vancouver-Hillsboro, OR-WA MSA (FS)	Full Scope	13.46	4	19.74	1	18.12	1	20.58	1	20.68	1	39.73	1
Texarkana, Tx - Texarkana, AR MSA (FS)	Full Scope	36.32	1	12.36	2	7.03	6	11.63	2	8.03	6	9.09	3
Washington-Arlington-Alexandria, DC-VA-MD MD (FS)	Full Scope	11.12	3	25.06	1	13.72	2	20.3	1	10.71	2	21.82	1
<b>ALABAMA</b>													
Birmingham-Hoover, AL MSA (FS)	Full Scope	11.80	3	18.93	1	8.45	3	17.76	1	7.01	3	13.33	3
Huntsville, AL MSA (FS)	Full Scope	8.41	3	17.16	1	5.55	2	17.7	1	5.73	5	2.02	7
Montgomery, AL MSA (FS)	Full Scope	10.64	4	17.88	1	6.79	4	16.21	1	5.79	4	11.11	4
Anniston-Oxford, AL MSA	Limited Scope	16.34	3	14.91	1	14.91	1	12.44	1	10.03	3	28.57	2
Auburn-Opelika, AL MSA	Limited Scope	6.33	6	20.25	1	20.25	1	16.41	1	9.9	2	18.18	2
Baldwin County, AL Non-Metro	Limited Scope	11.67	3	14.65	1	1.5	5	13.87	1	7.61	3	38.1	1
Cullman-Marshall, AL Non-Metro	Limited Scope	7.65	8	13.79	2	16.75	2	15.34	1	7.72	3	8.47	4
Dallas County, AL Non-Metro	Limited Scope	13.65	5	18.41	1	12.5	4	18.41	1	13.81	3	6.25	5
Decatur, AL MSA	Limited Scope	6.60	6	21.63	1	21.63	1	18.31	1	4.73	6	2.47	4
Dothan, AL MSA	Limited Scope	13.78	2	20.78	1	20.78	1	15.07	1	9.09	4	3.13	5
Eastern Central AL Non-Metro	Limited Scope	7.34	5	14.88	1	11.9	2	13.18	1	13.35	2	25	2

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Florence-Muscle Shoals, AL MSA	Limited Scope	6.73	7	12.22	2	12.22	2	12.08	2	5.2	5	0	0
Gadsden, AL MSA	Limited Scope	16.12	3	14.21	2	14.21	2	16.4	1	9.79	3	0	0
Marion County, AL Non-Metro	Limited Scope	13.50	4	15.49	1	8.7	4	15.59	2	15.22	2	8.33	4
Mobile, AL MSA	Limited Scope	8.84	4	17.67	1	17.67	1	16.66	1	5.98	3	0	0
Southeastern AL Non-Metro	Limited Scope	15.74	2	18.8	1	14.22	2	16.43	1	16.86	2	12.5	4
Tuscaloosa, AL MSA	Limited Scope	6.09	5	17.36	2	17.36	2	14.41	1	4.6	8	6.82	7
<b>ALASKA</b>													
Greater AK Non-Metro (FS)	Full Scope	59.95	1	35.6	1	50.25	1	41.67	1	48.22	1	59.67	1
Anchorage, AK MSA (FS)	Full Scope	51.62	1	38.16	1	24.65	1	39.39	1	31.38	1	61.43	1
Fairbanks, AK MSA	Limited Scope	34.74	1	27.56	1	8.43	5	22.04	1	25.36	2	33.33	1
<b>ARKANSAS</b>													
Ashdown, AR Non-Metro (FS)	Full Scope	12.72	3	8.89	2	4.45	5	12.53	1	2.87	15	1.59	13
<b>ARIZONA</b>													
Phoenix-Mesa-Glendale, AZ MSA (FS)	Full Scope	26.55	1	23.97	1	25.11	1	21.85	1	27	1	55.74	1
Tucson, AZ MSA (FS)	Full Scope	27.96	1	21.07	1	16.64	2	20.94	1	29.69	1	64.62	1
Eastern AZ Non-Metro	Limited Scope	20.11	3	17.64	1	40.34	1	30.2	1	27.68	1	50	1
Flagstaff, AZ MSA	Limited	28.78	1	25.89	1	26.98	1	22.26	1	28.76	1	44.44	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
	Scope												
Lake Havasu City-Kingman, AZ MSA	Limited Scope	23.62	1	30.65	1	34.95	1	26.01	1	26.91	1	61.9	1
Nogales-Douglas, AZ Non-Metro	Limited Scope	26.05	2	23.53	1	34	1	25.72	1	35.24	1	54.29	1
Prescott, AZ MSA	Limited Scope	25.10	1	23.56	1	37.04	130	22.19	1	23.06	2	48.72	1
Western AZ Non-Metro	Limited Scope	12.76	4	32.86	1	14.29	4	19.3	1	25.29	1	50	1
Yuma, AZ MSA	Limited Scope	25.45	1	18.42	1	31	1	24.83	1	30.25	1	80	1
<b>CALIFORNIA</b>													
Fresno, CA MSA (FS)	Full Scope	24.16	1	27.2	1	31.99	1	26.1	1	22.89	2	40.6	1
Los Angeles-Long Beach-Glendale, CA MD (FS)	Full Scope	16.64	2	19.46	1	24.86	1	16.71	1	23.77	2	69.01	1
Oakland-Fremont-Hayward, CA MD (FS)	Full Scope	29.99	1	20.12	1	25.81	1	18.78	1	33.39	1	65.43	1
Riverside-San Bernardino-Ontario, CA MSA (FS)	Full Scope	18.97	2	21.51	1	29.14	1	19.5	1	24.92	2	51.26	1
San Francisco-San Mateo-Redwood City, CA MD (FS)	Full Scope	15.72	2	24.31	1	26.01	1	21.26	1	35.8	1	70.86	1
Santa Ana-Anaheim-Irvine, CA MD (FS)	Full Scope	21.73	1	20.8	1	25.81	1	16.9	1	29.8	1	70.16	1
Bakersfield-Delano, CA MSA	Limited Scope	27.79	1	20.12	1	23.72	1	22.23	1	25.68	2	48.35	1
Central CA Non-Metro	Limited Scope	18.97	1	20.57	1	18.7	2	21.81	1	30.94	1	66.67	1
Chico, CA MSA	Limited Scope	19.39	2	19.81	1	26.92	1	16.59	1	20.6	2	36.49	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Eastern CA Non-Metro	Limited Scope	0.00	NA	36.05	1	13.33	3	19.38	1	13.21	2	25	3
El Centro, CA MSA	Limited Scope	19.61	2	23.9	1	48.28	1	23.04	1	27.76	2	27.96	2
Hanford-Corcoran, CA MSA	Limited Scope	22.60	1	21.51	2	17.5	3	22.7	1	26.89	2	37.23	1
Madera-Chowchilla, CA MSA	Limited Scope	24.71	1	22.75	1	25.45	1	24.55	1	24.64	2	42.07	1
Merced, CA MSA	Limited Scope	14.26	3	22.49	1	28.57	2	20.47	1	21.45	2	19.43	2
Modesto, CA MSA	Limited Scope	21.23	1	24.7	1	43.51	1	23.72	1	22.06	1	27.6	1
Napa, CA MSA	Limited Scope	21.10	1	27.1	1	25	2	22.82	1	27.94	1	60.17	1
Northern CA Non-Metro	Limited Scope	0.07	4	23.53	1	32	1	21.82	1	25.75	1	48.33	1
Oxnard-Thousand Oaks-Ventura, CA MSA	Limited Scope	26.46	1	22.93	1	21.65	2	18.56	1	29.68	2	56.6	1
Redding, CA MSA	Limited Scope	11.92	5	18.62	1	21.88	1	19.56	1	21.66	2	30.3	1
Sacramento--Arden-Arcade--Roseville, CA MSA	Limited Scope	25.89	1	23.03	1	23.86	1	21.48	1	33.24	1	41.28	1
Salinas, CA MSA	Limited Scope	30.32	1	22.89	1	35.9	1	23.2	1	35.4	1	61.82	1
San Diego-Carlsbad-San Marcos, CA MSA	Limited Scope	24.64	1	22.53	1	24.63	1	18.38	1	27.31	1	54.55	1
San Jose-Sunnyvale-Santa Clara, CA MSA	Limited Scope	24.45	1	23.73	1	28.84	1	19.28	1	33.07	1	60	1
San Luis Obispo-Paso Robles, CA MSA	Limited Scope	13.52	2	21.52	1	26.51	1	20.57	1	20.76	1	46.99	1
Santa Barbara-Santa Maria-	Limited	18.41	2	26.37	1	15.41	2	22.1	1	24.86	1	36.88	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Goleta, CA MSA	Scope												
Santa Cruz-Watsonville, CA MSA	Limited Scope	26.19	1	21.31	1	33.64	1	22.01	1	32.82	1	73.49	1
Santa Rosa-Petaluma, CA MSA	Limited Scope	25.11	1	21.9	1	26.2	1	22.07	1	29.98	1	52.63	1
Stockton, CA MSA	Limited Scope	19.62	1	26.6	1	39.84	1	23.86	1	24.71	1	22.54	2
Truckee-Grass Valley, CA Non-Metro	Limited Scope	20.03	1	20.19	1	27.62	1	21.83	1	32.8	1	43.48	1
Vallejo-Fairfield, CA MSA	Limited Scope	19.94	2	23.78	1	26.4	1	20.6	1	24.94	1	28.07	2
Visalia-Porterville, CA MSA	Limited Scope	13.06	3	21.45	1	35.98	1	25.31	1	22.35	1	40.73	1
Yuba City, CA MSA	Limited Scope	14.33	3	24.87	1	28.57	1	19.15	1	26.29	1	30.54	1
<b>COLORADO</b>													
Denver-Aurora-Broomfield, CO MSA (FS)	Full Scope	27.37	1	18.62	1	17.2	1	16.32	1	27.32	1	37.67	1
Boulder, CO MSA	Limited Scope	27.03	1	16.8	1	19.71	1	5.68	1	27.67	1	46.81	1
Canon City, CO Non-Metro	Limited Scope	13.28	4	23.94	1	27.91	1	22.92	1	29.63	1	88.24	1
Colorado Springs, CO MSA	Limited Scope	27.21	1	23.32	1	15.11	2	20.87	1	25.18	1	53.33	1
Durango, CO Non-Metro	Limited Scope	33.09	1	23.45	1	38.18	1	21.49	1	36.66	1	53.06	1
Fort Collins-Loveland, CO MSA	Limited Scope	17.41	2	18.3	1	17.94	1	18.12	1	26.72	1	48.98	1
Grand Junction, CO MSA	Limited Scope	36.51	1	22.67	1	27.55	1	25.36	1	37.56	1	68.33	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Greeley, CO MSA	Limited Scope	15.81	1	21.88	1	27.07	1	20.25	1	24.24	1	22.61	2
Pueblo, CO MSA	Limited Scope	27.93	1	21.84	1	15.74	3	17.89	1	26.02	1	18.18	2
Sterling-Fort Morgan, CO Non-Metro	Limited Scope	19.80	2	14.57	2	24.49	2	20.52	1	27.8	1	29.37	2
Western CO Non-Metro	Limited Scope	21.06	2	25.65	1	31.29	1	26.24	1	32.8	1	66.31	1
<b>CONNECTICUT</b>													
Bridgeport-Stamford-Norwalk, CT MSA (FS)	Full Scope	11.63	4	17.53	1	11.06	1	15.79	1	9.54	3	41.67	1
New Haven-Milford, CT MSA (FS)	Full Scope	12.19	2	19.09	1	10.32	2	16.58	1	10.46	2	44	1
Hartford-West Hartford-East Hartford, CT MSA	Limited Scope	1.97	11	17.15	1	5.47	4	13.86	1	5.16	6	7.89	4
Litchfield County, CT Non-Metro	Limited Scope	4.83	8	16.74	1	3.38	8	14.48	1	7.04	5	23.81	2
<b>DELAWARE</b>													
Wilmington, DE MD (FS)	Full Scope	0.53	12	24.51	1	15.28	2	17.82	1	8.21	5	7.69	5
Dover, DE MSA	Limited Scope	8.16	6	27.93	1	19.01	1	22.78	1	6.74	6	10	4
Sussex County, DE Non-Metro	Limited Scope	0.53	6	24.8	1	17.2	1	20.83	1	4.55	6	4.55	6
<b>FLORIDA</b>													
Fort Lauderdale-Pompano Beach-Deerfield Beach, FL MD (FS)	Full Scope	20.05	2	20.87	1	26.57	1	19.89	2	11.36	2	36.67	1
Miami-Miami Beach-Kendall, FL MD (FS)	Full Scope	15.59	1	18.91	1	28.76	1	18.24	2	8.28	4	37.29	1
Orlando-Kissimmee-Sanford, FL	Full	17.09	3	19.74	1	18.95	2	25.1	1	9.82	4	27.14	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
MSA (FS)	Scope												
Tampa-St. Petersburg-Clearwater, FL MSA (FS)	Full Scope	15.48	2	21.64	1	17.82	1	25.01	1	10.95	3	26.09	1
West Palm Beach-Boca Raton-Boynton Beach, FL MD (FS)	Full Scope	23.33	1	21.89	1	26.05	1	19.9	2	10.9	3	45.45	1
Cape Coral-Fort Myers, FL MSA	Limited Scope	17.07	1	18.38	1	24.28	1	25	1	12.08	2	20.83	2
Citrus-Sumter, FL Non-Metro	Limited Scope	6.97	6	9.21	3	9.94	4	15.05	1	7.41	6	16.67	3
Crestview-Fort Walton Beach-Destin, FL MSA	Limited Scope	7.27	6	20.45	1	13.64	2	18.18	1	6.11	4	50	1
Deltona-Daytona Beach-Ormond Beach, FL MSA	Limited Scope	21.10	2	18.96	1	18.66	2	24.15	1	15.28	2	21.05	2
DeSoto-Highlands, FL Non-Metro	Limited Scope	13.91	3	9.15	3	14.94	3	19.93	1	11.49	3	21.88	1
Gainesville, FL MSA	Limited Scope	22.65	1	15.07	1	31.78	1	25.54	1	12.27	2	3.75	7
Jacksonville, FL MSA	Limited Scope	12.01	3	20.87	1	15.77	2	25.44	1	12.76	2	50	1
Lakeland-Winter Haven, FL MSA	Limited Scope	18.25	2	18.7	1	15.2	3	24.16	1	13.62	2	37.84	1
Madison-Taylor, FL Non-Metro	Limited Scope	20.24	3	15.09	1	40	1	24.06	1	15.61	2	50	1
Monroe County, FL Non-Metro	Limited Scope	5.30	7	14.66	1	19.23	2	20.05	1	7.4	5	0	0
Naples-Marco Island, FL MSA	Limited Scope	12.74	2	17.72	1	25.51	1	21.68	1	10.15	2	23.53	2
North Port-Bradenton-Sarasota, FL MSA	Limited Scope	15.26	2	19.01	1	18.67	2	23.54	1	10.17	4	17.65	3
Ocala, FL MSA	Limited Scope	15.58	3	14.29	1	27.88	1	20.57	1	11.36	3	21.82	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Palm Bay-Melbourne-Titusville, FL MSA	Limited Scope	22.89	1	23.59	1	18.92	2	24.73	1	14.86	2	53.85	1
Palm Coast, FL MSA	Limited Scope	19.80	3	21.57	1	13.43	2	24.42	1	11.13	4	0	0
Panama City-Lynn Haven-Panama City Beach, FL MSA	Limited Scope	7.39	6	10.71	1	6.11	4	15.26	1	5.48	4	0	0
Panhandle FL Non-Metro	Limited Scope	10.07	3	15.26	1	15.48	2	15.28	1	8.06	4	9.84	4
Pensacola-Ferry Pass-Brent, FL MSA	Limited Scope	11.53	2	17.38	1	8.96	4	16.87	1	6.25	5	20.83	3
Port St Lucie, FL MSA	Limited Scope	16.46	1	19.55	1	12.96	3	22.28	1	11.14	4	18.52	2
Punta Gorda, FL MSA	Limited Scope	20.90	1	17.43	1	11.27	3	22.46	1	11.48	3	20	2
Sebastian-Vero Beach, FL MSA	Limited Scope	20.92	1	19.53	1	20.27	1	18.77	2	13	2	20	2
Tallahassee, FL MSA	Limited Scope	12.24	3	19.28	1	7.61	5	20.2	1	5.58	6	0	0
<b>GEORGIA</b>													
Atlanta-Sandy Springs-Marietta, GA MSA (FS)	Full Scope	18.49	2	23.72	1	22.18	1	23.78	1	16.02	2	27.04	1
Athens-Clarke County, GA MSA	Limited Scope	8.48	6	28.05	1	13.51	1	22.86	1	8.42	3	4.69	4
Brunswick, GA MSA	Limited Scope	2.29	13	17.59	1	6.45	4	13.18	1	4.36	11	0	0
Bulloch County, GA Non-Metro	Limited Scope	8.38	5	19.14	1	13.51	3	17.91	1	5.38	5	1	6
Chattanooga, GA MSA	Limited Scope	1.04	19	15.43	1	9.09	4	13.49	1	6.52	5	11.11	1
Dalton, GA MSA	Limited Scope	19.05	2	20	1	11.38	4	14.04	1	8.59	4	20	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Gainesville, GA MSA	Limited Scope	22.65	1	22.06	1	16.67	3	21.49	1	11.44	3	11.11	3
Gordon County, GA Non-Metro	Limited Scope	7.40	4	18.15	1	10	3	18.97	1	6.49	5	3.85	4
Greene County, GA Non-Metro	Limited Scope	9.97	3	12.94	1	5.26	7	16.51	1	10.39	2	0	0
Hinesville-Fort Stewart, GA MSA	Limited Scope	6.78	3	27.16	1	10.11	2	10.18	2	11.58	3	0	0
Jackson County, GA Non-Metro	Limited Scope	4.05	9	21.53	1	16.13	2	21.61	1	7.1	5	7.14	6
Laurens County, GA Non-Metro	Limited Scope	2.74	9	25.1	1	17.65	2	21.95	1	3.61	9	0	0
Lumpkin County, GA Non-Metro	Limited Scope	15.76	3	15.67	1	8.89	4	16.79	1	10.34	2	0	0
Macon, GA MSA	Limited Scope	7.40	5	22.65	1	16.44	2	16.07	1	6.39	5	12.5	3
Rome, GA MSA	Limited Scope	15.22	3	20.36	1	10.31	3	18.38	1	5.83	6	23.08	2
Savannah, GA MSA	Limited Scope	21.30	1	20.79	1	20.36	1	20.21	1	14.17	2	25	1
Southern GA Non-Metro	Limited Scope	4.76	8	13.17	1	7.89	4	10.31	2	4.98	6	0.82	10
Sumter County, GA Non-Metro	Limited Scope	18.78	3	16.5	1	20.51	2	13.86	1	10.83	3	2.94	5
Warner Robins, GA MSA	Limited Scope	6.51	7	20.97	1	8.21	3	14.18	1	6.25	6	4.35	6
Washington County, GA Non-Metro	Limited Scope	5.60	4	14.75	2	7.69	2	10.69	2	9.26	3	0	0
<b>IDAHO</b>													
Boise City-Nampa, ID MSA (FS)	Full Scope	26.78	1	17.18	1	12.6	2	22.72	1	27	1	30.12	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Central ID Non-Metro (FS)	Full Scope	19.89	1	17.21	1	15.09	2	23.9	1	27.25	1	31.42	1
Bear Lake County, ID Non-Metro	Limited Scope	24.13	2	6.25	6	11.76	4	12.58	3	22.22	1	11.54	3
Coeur d'Alene, ID MSA	Limited Scope	22.84	1	27.37	1	25.95	1	31.16	1	26.37	1	56.76	1
Idaho Falls, ID MSA	Limited Scope	20.00	2	20.9	1	6.58	2	18.19	1	22.75	1	12.77	3
Lewiston, ID MSA	Limited Scope	19.98	1	31.19	1	17.74	3	23.43	1	24.29	1	30.77	1
Panhandle ID Non-Metro	Limited Scope	27.22	1	31.18	1	25.76	2	24.01	1	30.6	1	40.73	1
Pocatello, ID MSA	Limited Scope	24.20	1	9.86	2	7.69	6	11.94	2	20.09	2	26.67	2
Rexburg-Driggs, ID Non-Metro	Limited Scope	16.64	2	21.89	1	28.57	1	19.4	1	19.9	1	12.3	3
Western ID Non-Metro	Limited Scope	13.45	3	20.69	1	17.39	1	22.35	1	23.28	1	24.73	2
<b>IOWA</b>													
Cedar Rapids, IA MSA (FS)	Full Scope	12.13	2	13.77	1	8.13	4	17.01	1	22.31	1	15.49	3
Des Moines-West Des Moines, IA MSA (FS)	Full Scope	16.94	1	31.83	1	13.44	1	25.91	1	27.37	1	52.01	1
Ames, IA MSA	Limited Scope	6.78	6	18.12	1	7.37	4	18.49	1	22.08	1	23.81	2
Cass County, IA Non-Metro	Limited Scope	60.50	1	25.81	1	22.73	1	32.64	1	34.18	1	67.11	1
Crawford County, IA Non-Metro	Limited Scope	12.35	4	27.27	2	19.44	2	30.72	2	51.4	1	94	1
Fort Dodge, IA Non-Metro	Limited Scope	13.85	1	21.09	1	24.42	1	21.88	1	22.58	1	18.52	3

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Iowa City, IA MSA	Limited Scope	2.73	6	3.91	6	2.57	8	6.94	5	6.17	5	1.04	5
Marion County, IA Non-Metro	Limited Scope	16.13	2	29.5	1	31.03	1	27.1	1	37.3	1	39.83	1
Marshalltown, IA Non-Metro	Limited Scope	19.56	1	22.94	1	20.51	2	17.5	1	28.01	1	37.57	2
Mason City, IA Non-Metro	Limited Scope	10.69	4	26.55	1	39.22	1	30.98	1	26.85	1	23.56	2
Ottumwa, IA Non-Metro	Limited Scope	17.89	2	29.52	1	37.5	1	29.74	1	35.87	1	38.71	1
Palo Alto County, IA Non-Metro	Limited Scope	9.87	4	22.5	2	18.18	3	28.41	1	23.36	1	81.48	1
Poweshiek County, IA Non-Metro	Limited Scope	14.93	2	14.46	2	31.25	2	13.74	2	32.61	1	47.89	1
Sioux City, IA MSA	Limited Scope	14.73	2	18.96	1	7.58	4	19.32	1	28.15	1	33.87	2
Waterloo-Cedar Falls, IA MSA	Limited Scope	11.97	2	6.85	5	7.38	2	7.34	4	15.82	2	16.44	3
<b>ILLINOIS</b>													
Chicago-Joliet-Naperville, IL MD (FS)	Full Scope	1.63	12	19.57	1	11.16	2	12.36	2	2.49	7	1.92	8
Galesburg-Canton, IL Non-Metro	Limited Scope	31.69	1	26.42	1	15.14	3	23.03	1	19.41	1	15.17	3
Sterling, IL Non-Metro	Limited Scope	17.28	1	4.1	7	6.19	5	10.42	2	11.43	3	32.18	1
<b>INDIANA</b>													
Fort Wayne, IN MSA (FS)	Full Scope	24.85	1	16.45	1	12.03	3	13.08	1	18.27	1	22.49	2
Northeastern IN Non-Metro (FS)	Full	14.74	3	13.55	1	16.46	2	19.9	1	8.88	3	10.78	3

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Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
	Scope												
Decatur, IN Non-Metro	Limited Scope	10.07	4	12.56	2	8	4	14.45	3	27.01	1	57.14	1
Elkhart-Goshen, IN MSA	Limited Scope	0.00	0	13.32	1	2.41	9	8.52	4	3.26	10	8.7	3
Indianapolis-Carmel, IN MSA	Limited Scope	0.00	0	15.64	1	6.75	3	10.05	2	2.94	11	26.22	2
Michigan City-La Porte, IN MSA	Limited Scope	18.20	3	16.48	1	7	5	11.36	1	10.06	3	45.69	1
North Central IN Non-Metro	Limited Scope	15.01	1	16.85	1	9.82	3	11.14	2	24.9	1	50.7	1
Rush County, IN Non-Metro	Limited Scope	48.26	1	29.79	1	20	2	35.74	1	29.54	1	56.76	1
South Bend-Mishawaka, IN MSA	Limited Scope	8.73	4	18.35	1	7.76	2	13.28	1	11.84	1	14.16	2
White County, IN Non-Metro	Limited Scope	17.68	3	11.74	2	4.62	7	15.31	1	21.26	1	65.22	1
<b>KANSAS</b>													
Kansas City, KS MSA (FS)	Full Scope	1.28	16	20.67	1	9.01	2	17.14	1	3.48	7	4.55	6
Atchison County, KS Non-Metro	Limited Scope	7.69	4	14.17	2	18.18	2	19.91	2	7.29	4	2.78	3
Wichita, KS MSA	Limited Scope	2.99	8	16.05	1	4.56	4	14.52	1	3.55	10	3.25	7
<b>MARYLAND</b>													
Baltimore-Towson, MD MSA (FS)	Full Scope	9.29	4	26.48	1	13.56	1	19.38	1	9.91	2	19.81	3
Bethesda-Rockville-Frederick, MD MD	Limited Scope	7.63	4	9.58	2	16.64	1	18.11	1	7.21	5	15	3
<b>MICHIGAN</b>													

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Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Northwestern MI Non-Metro (FS)	Full Scope	19.85	1	22.5	1	29.17	1	27.78	1	8.35	5	9.2	4
Grand Rapids-Wyoming, MI MSA	Limited Scope	14.30	2	11.9	1	2.18	11	6.63	5	2.57	13	7.64	4
<b>MINNESOTA</b>													
Greater MN Non-Metro (FS)	Full Scope	14.28	1	24.26	1	20.12	1	25.52	1	26.46	1	24.99	1
Duluth, MN MSA	Limited Scope	25.07	1	20.29	1	22.12	1	24.17	1	45.02	1	82.76	1
Mankato-North Mankato, MN MSA	Limited Scope	19.67	1	32.27	1	25.41	1	37.8	1	34.97	1	34.97	1
Northeastern MN Non-Metro	Limited Scope	17.74	3	19.08	1	35	1	21.29	1	42.8	1	83.33	1
Rochester, MN MSA	Limited Scope	20.88	2	25.28	1	15.83	2	23.55	1	43	1	73.28	1
St. Cloud, MN MSA	Limited Scope	15.05	2	23.76	1	19.3	1	20.48	1	26.49	1	17.13	3
<b>MISSISSIPPI</b>													
Jackson, MS MSA (FS)	Full Scope	9.97	8	14.97	2	4.42	7	14.54	2	2.22	12	0.92	10
Gulfport-Biloxi, MS MSA	Limited Scope	4.90	7	17.56	1	4.09	7	13.82	1	4.54	8	26.67	1
Hattiesburg, MS MSA	Limited Scope	5.31	6	13.64	1	3.96	8	14.56	1	3.15	10	2.41	8
Pascagoula, MS MSA	Limited Scope	14.22	7	14.34	1	2.67	7	11.17	1	7.9	4	25	3
<b>MONTANA</b>													
Billings, MT MSA (FS)	Full Scope	11.72	4	15.28	1	12.86	3	17.46	1	15.9	3	14.33	3
Greater MT Non-Metro (FS)	Full	13.76	2	23.51	1	29.72	1	26.24	1	18.15	2	24.29	2

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Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
	Scope												
Eastern MT Non-Metro	Limited Scope	22.15	2	12.68	2	45.71	1	23.4	1	15.86	2	28.27	2
Fallon County, MT Non-Metro	Limited Scope	21.87	2	50	1	100	1	66.67	1	39.32	1	13.33	3
Great Falls, MT MSA	Limited Scope	17.98	3	18.71	1	8.08	3	24.88	1	22.14	1	17.21	2
Mineral County, MT Non-Metro	Limited Scope	37.80	2	22.86	1	0	0	19.15	1	40	1	100	1
Missoula, MT MSA	Limited Scope	8.42	4	14.91	1	9.78	5	19.46	1	12	3	19.05	2
<b>NEBRASKA</b>													
Lincoln, NE MSA (FS)	Full Scope	17.58	2	21.07	1	8.98	4	16.83	1	26.1	1	5.8	3
Tri-City, NE Non-Metro (FS)	Full Scope	14.58	1	24.11	1	24.84	1	21.06	1	22.77	1	22.74	3
Norfolk, NE Non-Metro	Limited Scope	7.94	3	22.27	1	35.71	1	27.41	1	19.82	1	19.82	3
North Platte, NE Non-Metro	Limited Scope	10.70	3	16.75	2	25	1	23.08	1	24.32	1	12.61	3
Northern NE Non-Metro	Limited Scope	13.40	4	35.71	1	0	0	21.43	2	28.89	1	26.84	2
Red Willow County, NE Non-Metro	Limited Scope	8.12	4	7.37	6	0	0	13.86	2	26.84	2	33.33	1
Western NE Non-Metro	Limited Scope	19.78	3	23.66	1	23.66	1	36.8	1	45.9	1	46.67	1
<b>NEVADA</b>													
Las Vegas-Paradise, NV MSA (FS)	Full Scope	22.14	2	22.75	1	32.25	1	23.7	1	25.27	1	63.64	1
Reno-Sparks, NV MSA	Limited	5.74	2	27.42	1	40.13	1	29.21	1	31.83	1	53.85	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
	Scope												
Greater NV Non-Metro	Limited Scope	30.54	1	25.18	1	34.64	1	28.32	1	32.55	1	64.38	1
Carson City, NV MSA	Limited Scope	37.86	1	20.24	1	42.86	1	20.78	1	31.04	1	25	2
<b>NEW JERSEY</b>													
Edison-New Brunswick, NJ MD (FS)	Full Scope	14.18	1	25.41	1	12.75	1	21.44	1	10.07	3	18.06	1
Atlantic City-Hammonton, NJ MSA	Limited Scope	19.66	1	54.16	1	9.03	3	25.28	1	8.36	3	18.18	3
Camden, NJ MD	Limited Scope	12.11	2	19.13	1	7.79	3	20.13	1	10.21	2	38.1	1
Ocean City, NJ MSA	Limited Scope	2.93	10	17.63	1	13.81	1	22.68	1	5.49	8	0	0
Trenton-Ewing, NJ MSA	Limited Scope	14.25	3	31.68	1	9.5	3	21.95	1	11.71	2	21.43	3
<b>NEW MEXICO</b>													
Albuquerque, NM MSA (FS)	Full Scope	34.99	1	17.92	1	16.31	2	16.3	1	30.94	1	61.11	1
Greater NM Non-Metro (FS)	Full Scope	12.31	1	21.26	1	30.27	1	17.64	1	27.52	1	55.62	1
Farmington, NM MSA	Limited Scope	25.05	2	23.7	1	31.2	1	19.8	1	32.09	1	76.47	1
Las Cruces, NM MSA	Limited Scope	26.55	1	13.78	2	46.9	1	18.87	1	37.71	1	65.22	1
Santa Fe, NM MSA	Limited Scope	19.76	3	13.4	1	17.27	1	12.77	1	22.79	2	76.92	1
<b>NEW YORK</b>													
Nassau-Suffolk, NY MD (FS)	Full Scope	0.91	19	27.85	1	13.95	1	20.1	1	2.4	8	9.38	4

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Kingston, NY MSA	Limited Scope	25.20	1	18.49	2	4.31	5	14.21	1	5.26	7	22.22	2
Poughkeepsie-Newburgh-Middletown, NY MSA	Limited Scope	2.75	12	28.27	1	6.76	3	19.69	1	4.82	5	6.67	5
<b>NORTH CAROLINA</b>													
Greensboro-High Point, NC MSA (FS)	Full Scope	18.70	1	26.68	1	18.22	2	25.61	1	14.54	3	23	1
Northwestern NC Non-Metro (FS)	Full Scope	15.74	1	17.44	1	17.61	2	17.58	1	13.57	2	10.97	2
Raleigh-Cary, NC MSA (FS)	Full Scope	25.36	1	22.83	1	23.71	1	22.67	1	14.34	2	9.52	3
Winston-Salem, NC MSA (FS)	Full Scope	6.47	2	25.78	1	12.34	2	24.11	1	14.46	3	10.96	4
Asheville, NC MSA	Limited Scope	20.36	1	15.78	1	21.28	1	19.99	1	15.28	2	20	3
Burlington, NC MSA	Limited Scope	22.10	1	24.97	1	27.17	1	21.91	1	18.18	2	14.29	3
Camden-Pasquotank, NC Non-Metro	Limited Scope	17.95	2	23.67	1	19.72	2	21.5	1	13.03	1	13.48	2
Dare County, NC Non-Metro	Limited Scope	14.71	3	21.7	1	22.92	1	22.22	1	18.14	1	25	2
Durham-Chapel Hill, NC MSA	Limited Scope	26.30	1	18.58	1	18.62	2	18.3	1	13.75	2	32.26	1
Eastern NC Non-Metro	Limited Scope	16.94	3	22.35	1	14.45	3	18.54	1	17.91	1	11.25	4
Fayetteville, NC MSA	Limited Scope	13.33	3	31.27	1	18.34	2	24.35	1	9.06	4	13.51	2
Goldsboro, NC MSA	Limited Scope	16.21	2	43.29	1	19.39	2	24.8	1	12.05	3	3.47	5
Greenville, NC MSA	Limited Scope	20.96	1	18.93	1	11.67	3	21.71	1	12.98	3	15.45	3

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Hickory-Lenoir-Morganton, NC MSA	Limited Scope	17.73	2	19.19	1	18.22	2	18.84	1	13.02	3	10.91	3
Jacksonville, NC MSA	Limited Scope	14.46	3	46.27	1	8.05	3	23.78	1	13.84	3	6.25	5
Lee-Moore, NC Non-Metro	Limited Scope	9.87	3	26.32	1	12.5	2	22.47	1	7.17	5	1.54	9
Rocky Mount, NC MSA	Limited Scope	10.83	4	19.56	1	14.89	2	17.72	1	12.19	2	4.5	5
Southern NC Non-Metro	Limited Scope	9.50	5	20.57	1	6.47	3	12.37	2	8.19	5	4.84	6
Western NC Non-Metro	Limited Scope	17.01	2	11.36	1	22.5	1	16.05	1	15.19	2	10	4
Wilmington, NC MSA	Limited Scope	15.25	2	22.63	1	13.88	2	22.96	1	11.04	3	12.2	4
Wilson County, NC Non-Metro	Limited Scope	16.58	2	21.51	1	28.85	1	25.14	1	15.55	2	12.9	3
<b>NORTH DAKOTA</b>													
Bismarck, ND MSA (FS)	Full Scope	19.30	1	14.29	1	9.9	3	20.36	1	23.97	2	11.93	2
Minot, ND Non-Metro (FS)	Full Scope	12.18	3	15.36	1	12.07	2	21	1	17.71	2	20.88	3
Bowman County, ND Non-Metro	Limited Scope	11.40	4	44.44	1	25	1	50	1	54.26	1	92.45	1
Dickinson, ND Non-Metro	Limited Scope	12.19	4	9.44	4	11	4	20.08	1	20.83	2	26.63	2
Jamestown, ND Non-Metro	Limited Scope	22.78	1	11.22	3	7.76	5	21.72	1	21.97	3	20.29	2
Northeastern ND Non-Metro	Limited Scope	6.14	7	21.84	1	22.22	2	19.23	1	20.62	2	21.95	2
Trail County, ND Non-Metro	Limited Scope	7.16	6	28.4	1	37.5	1	36.89	1	28.46	1	63.46	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Wahpeton, ND Non-Metro	Limited Scope	23.89	2	25.6	1	29.79	2	34.25	1	34.46	1	54.87	1
<b>OHIO</b>													
Van Wert, OH Non-Metro (FS)	Full Scope	14.13	4	9.99	2	2.62	8	5.66	4	21.8	1	42.17	1
Cleveland-Elyria-Mentor, OH MSA	Limited Scope	0.00	44	14.51	1	3.65	7	8.35	3	2.92	8	13.64	2
<b>OREGON</b>													
Eugene-Springfield, OR MSA (FS)	Full Scope	16.29	2	19.42	1	28.91	1	23.87	1	14.7	3	55.22	1
Salem, OR MSA (FS)	Full Scope	17.38	2	24.94	1	28	1	27.71	1	17.66	3	25.66	2
Southwestern OR Non-Metro (FS)	Full Scope	8.99	5	17.4	1	21.11	1	21.42	1	16.35	3	35.95	1
Bend, OR MSA	Limited Scope	20.51	1	22.36	1	36.51	1	24.86	1	21.12	1	58.82	1
Coastal OR Non-Metro	Limited Scope	8.91	5	20.81	1	32.23	1	24.19	1	16.93	3	33.04	1
Corvallis, OR MSA	Limited Scope	22.37	2	18.37	1	21.43	1	22.82	1	25.68	1	44.44	1
Eastern OR Non-Metro	Limited Scope	5.65	6	19.17	1	12.67	3	24.58	1	13.12	3	9.66	4
Medford, OR MSA	Limited Scope	13.89	2	18.82	1	17.59	1	21.13	1	20.38	2	53.95	1
Northern OR Non-Metro	Limited Scope	14.67	2	21.85	1	24.79	1	26.25	1	19.25	2	21.76	2
<b>PENNSYLVANIA</b>													
Philadelphia, PA MD (FS)	Full Scope	21.80	1	24.81	1	11.17	2	21.35	1	11.93	2	12.62	2
Harrisburg-Carlisle, PA MSA	Limited	9.24	4	21.87	1	6.35	3	15.9	1	5.19	7	7.02	6

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
	Scope												
Lancaster, PA MSA	Limited Scope	9.29	4	24.23	1	9.95	3	22.76	1	6.35	5	1.07	7
Lebanon, PA MSA	Limited Scope	18.18	2	20.67	1	8.82	3	15.87	1	1.07	7	1.61	7
Monroe-Wayne, PA Non-Metro	Limited Scope	6.25	8	24.07	1	3.64	8	16.76	1	8.34	5	10	3
Northumberland-Schuylkill, PA Non-Metro	Limited Scope	12.47	3	20.64	1	5.21	6	13.92	1	9.7	3	15.79	3
Reading, PA MSA	Limited Scope	17.55	2	24.75	1	7.58	4	22.65	1	10.78	3	11.97	3
Scranton--Wilkes-Barre, PA MSA	Limited Scope	9.19	2	16.47	1	3.95	10	16.69	1	8.32	3	30	1
York-Hanover, PA MSA	Limited Scope	7.21	6	23.66	1	7.93	5	19.05	1	5.98	7	5.95	6
<b>SOUTH CAROLINA</b>													
Charleston-North Charleston-Summerville, SC MSA (FS)	Full Scope	21.14	1	21.04	1	12.01	3	18.39	1	14.21	2	27.08	2
Columbia, SC MSA (FS)	Full Scope	27.46	1	19.79	1	19.89	1	17.01	1	11.91	3	15.05	3
Greenville-Mauldin-Easley, SC MSA (FS)	Full Scope	15.68	1	23.57	1	13.32	3	17.15	1	11.1	2	16.67	2
Anderson, SC MSA	Limited Scope	13.82	1	23.89	1	17.8	3	17.61	1	11.33	2	33.33	1
Florence, SC MSA	Limited Scope	22.86	1	22.16	1	11.65	2	16.99	1	15.74	2	17.65	2
Myrtle Beach-North Myrtle Beach-Conway, SC MSA	Limited Scope	9.37	5	19.48	1	10.14	3	16.22	1	8.01	3	1.2	9
Northeastern SC Non-Metro	Limited Scope	15.34	2	14.52	1	21.3	1	14.56	1	12.64	2	6.38	3

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Northwestern SC Non-Metro	Limited Scope	14.87	1	15.4	1	21.43	1	14.76	1	13.86	2	24	2
Oconee County, SC Non-Metro	Limited Scope	12.99	3	14.76	1	12.68	4	17.56	1	12.05	2	12.5	3
Southern SC Non-Metro	Limited Scope	12.84	2	25.54	1	10.87	4	18.8	1	12.15	2	3.26	5
Spartanburg, SC MSA	Limited Scope	11.25	4	24.41	1	17.59	1	17.51	1	11.32	2	15.38	3
Sumter, SC MSA	Limited Scope	21.47	2	13.73	2	16.67	3	12.02	1	14.29	3	27.78	2
<b>SOUTH DAKOTA</b>													
Greater SD Non-Metro (FS)	Full Scope	18.22	1	17.16	1	16.58	2	22.35	1	30.18	1	30.41	2
Sioux Falls, SD MSA (FS)	Full Scope	24.04	2	18.16	1	17.45	2	22.98	1	28.51	1	45.16	1
Fall River County, SD Non-Metro	Limited Scope	38.80	1	11.69	2	7.14	4	30.93	1	46.8	1	9.21	3
Mitchell, SD Non-Metro	Limited Scope	20.49	2	18.82	1	11.76	3	27.76	1	44.04	1	44.04	2
Rapid City, SD MSA	Limited Scope	24.60	1	21.33	1	14.77	2	26.75	1	27.37	1	13.97	2
Western SD Non-Metro	Limited Scope	28.69	2	28.74	1	22.09	2	39.16	1	44.53	1	30.22	2
Yankton-Vermillion, SD Non-Metro	Limited Scope	9.88	4	12.28	2	13.73	3	25.79	1	31.52	1	37.93	2
<b>TENNESSEE</b>													
Nashville-Davidson-- Murfreesboro-Franklin, TN MSA (FS)	Full Scope	2.27	9	17.95	1	10.25	1	16.18	1	3.31	9	2.02	10
<b>TEXAS</b>													

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Austin-Round Rock-San Marcos, TX MSA (FS)	Full Scope	22.17	1	22.29	1	8.13	3	18.75	1	22.34	2	25.08	2
Dallas-Plano-Irving, TX MD (FS)	Full Scope	7.28	3	25.2	1	11.07	1	19.51	1	10.84	4	10.08	4
El Paso, TX MSA (FS)	Full Scope	31.48	1	17.5	2	5.36	2	15.47	1	24.66	1	58.62	1
Fort Worth-Arlington, TX MD (FS)	Full Scope	16.38	2	24.87	1	13.49	1	20.43	1	18.39	2	43.56	1
Houston-Sugar Land-Baytown, TX MSA (FS)	Full Scope	16.45	2	23.91	1	12.58	1	18.09	1	16.35	3	30.73	2
Amarillo, TX MSA	Limited Scope	6.91	3	7.31	5	3.71	4	10.09	2	6.92	4	8.59	4
Atlanta, TX Non-Metro	Limited Scope	8.72	4	8.71	2	5.13	6	7.45	4	8.61	4	0	0
Beaumont-Port Arthur, TX MSA	Limited Scope	13.51	5	15.69	1	5.79	8	16.07	1	14.46	2	12.82	3
Big Spring, TX Non-Metro	Limited Scope	21.18	2	5.43	4	28.57	2	11.56	4	14.85	3	33.33	2
Borger, TX Non-Metro	Limited Scope	18.72	2	11.93	3	13.04	2	9.4	2	23.19	2	0	0
Brazos Valley, TX Non-Metro	Limited Scope	12.38	2	17.47	1	14.81	2	19.2	1	23.64	1	18.07	2
Brownsville-Harlingen, TX MSA	Limited Scope	22.29	1	17	1	17	2	23.47	1	19.94	2	38.98	1
Central TX Non-Metro	Limited Scope	9.01	4	17.03	1	11.43	2	16.93	1	20.34	1	7.59	3
College Station-Bryan, TX MSA	Limited Scope	17.35	2	19	1	8.33	4	19.47	1	16.89	2	12.25	3
Corpus Christi, TX MSA	Limited Scope	14.36	3	16	1	9.18	3	15.08	1	15.29	2	21.19	2
Garza County, TX Non-Metro	Limited	61.91	1	23.68	1	0	0	11.11	4	35.19	1	100	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
	Scope												
Hartley County, TX Non-Metro	Limited Scope	13.95	2	23.91	1	28.57	3	12.2	3	8.08	3	10.53	2
Hill County, TX Non-Metro	Limited Scope	12.37	3	22.36	1	16.67	3	23.14	1	29.82	1	64.71	1
Kerrville, TX Non-Metro	Limited Scope	26.75	1	20.09	1	13.95	2	22.7	1	40.45	1	37.84	2
Killeen-Temple-Fort Hood, TX MSA	Limited Scope	3.36	9	17.91	1	3	7	20.2	1	6	6	3.27	4
Laredo, TX MSA	Limited Scope	5.26	6	14.93	2	22.13	2	19.92	1	10.57	3	10.53	2
Lubbock, TX MSA	Limited Scope	8.95	4	18.23	1	7	5	19.8	1	11.66	3	7.44	3
McAllen-Edinburg-Mission, TX MSA	Limited Scope	4.23	8	15.86	2	13.2	3	19.65	1	9.16	3	5.19	5
Midland, TX MSA	Limited Scope	22.09	1	13.54	3	12.12	3	11.67	2	19.46	2	23.08	2
Montague County, TX Non-Metro	Limited Scope	12.02	3	19.76	1	15.38	3	20	1	21.69	1	27.78	2
Odessa, TX MSA	Limited Scope	8.38	4	18.99	1	5.33	7	14.13	1	7.2	4	20	3
Plainview, TX Non-Metro	Limited Scope	18.85	3	25.63	2	9.76	3	21.62	2	14.58	3	13.1	4
San Angelo, TX MSA	Limited Scope	25.76	1	22.13	1	2.97	6	18.55	1	24.9	1	50	1
San Antonio-New Braunfels, TX MSA	Limited Scope	4.60	4	17.4	1	6.72	4	17.71	1	15.66	2	38.91	1
South TX Non-Metro	Limited Scope	35.79	1	15.13	1	20.97	1	16.49	1	29.76	1	39.47	1
Southeastern TX Non-Metro	Limited Scope	13.83	2	18.67	1	9.2	2	24.25	1	32.06	1	33.1	1

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Victoria, TX MSA	Limited Scope	24.55	2	21.2	1	11.02	3	26.42	1	23.13	1	9.02	5
Waco, TX MSA	Limited Scope	13.38	1	16.03	1	6	5	18.06	1	16.61	2	38.46	1
Wichita Falls, TX MSA	Limited Scope	17.64	1	10.52	3	10.43	4	17.13	1	27.1	1	52.63	1
Yoakum County, TX Non-Metro	Limited Scope	26.11	3	13.46	2	62.5	1	19.44	1	12.82	4	12.82	4
<b>UTAH</b>													
Salt Lake City, UT MSA (FS)	Full Scope	1.95	13	20.61	1	20.77	2	20.28	1	26.45	1	60	1
Brigham City, UT Non-Metro	Limited Scope	24.65	1	16.01	1	26.32	2	16.1	1	27.97	1	48.04	1
Greater UT Non-Metro	Limited Scope	24.84	2	14.99	1	16.29	2	16.03	1	28.49	1	30.68	2
Ogden-Clearfield, UT MSA	Limited Scope	75.66	1	20.38	1	10.11	2	18.17	1	26.32	1	45.24	1
Provo-Orem, UT MSA	Limited Scope	28.74	1	18.72	1	15.73	2	18.78	1	24.52	2	37.76	2
St. George, UT MSA	Limited Scope	23.98	2	21.32	1	27.27	1	20.45	1	27.56	1	60	1
<b>VIRGINIA</b>													
Richmond, VA MSA (FS)	Full Scope	8.04	3	29.63	1	18.21	1	21.45	1	19.97	2	18.03	1
Virginia Beach-Norfolk-Newport News, VA MSA (FS)	Full Scope	20.77	1	28.15	1	37.2	1	23.18	1	14.28	2	18.06	3
Blacksburg-Christiansburg-Radford, VA MSA	Limited Scope	13.30	3	18.47	1	5.85	6	17.28	1	10.69	2	7.69	6
Charlottesville, VA MSA	Limited Scope	20.26	1	15.97	1	6.77	3	16.33	1	15.17	2	10.71	3

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Danville, VA MSA	Limited Scope	3.27	7	17.54	1	9.32	3	17.28	1	7.11	8	8.7	4
Harrisonburg, VA MSA	Limited Scope	19.23	1	15.81	1	9.63	2	17.64	1	9.47	2	16.67	2
Kingsport-Bristol-Bristol, VA MSA	Limited Scope	7.84	6	15.21	1	4.76	7	14.35	1	8	3	0.67	7
Lynchburg, VA MSA	Limited Scope	22.67	1	19.06	1	12.45	3	19.19	1	19.68	1	26.67	1
Martinsville-Henry County, VA Non-Metro	Limited Scope	3.47	7	12.02	3	8.04	5	14.94	2	4.2	9	0	0
Northern VA Non-Metro	Limited Scope	23.32	1	28.08	1	14.17	3	22.17	1	19.87	1	15.63	3
Northwestern VA Non-Metro	Limited Scope	6.82	4	16.27	1	13.52	4	15.13	1	7.79	4	5.05	4
Prince Edward County, VA Non-Metro	Limited Scope	16.66	3	15.13	1	13.89	3	10.63	3	15.53	2	15.53	4
Roanoke, VA MSA	Limited Scope	28.95	1	21.21	1	7.93	5	17.05	1	13.19	3	8.33	4
Southside VA Non-Metro	Limited Scope	13.71	4	22.31	1	22.99	2	16.17	2	19.88	1	8.33	4
Western VA Non-Metro	Limited Scope	11.52	2	11.04	2	5.04	7	12.85	2	9.98	2	1.04	10
Winchester, VA MSA	Limited Scope	17.02	2	25.31	1	11.43	3	28.25	1	14.28	2	66.67	1
<b>WASHINGTON</b>													
Seattle-Bellevue-Everett, WA MD (FS)	Full Scope	13.10	2	18.58	1	15.83	1	18.55	1	18.58	2	33.84	2
Bellingham, WA MSA	Limited Scope	6.60	6	16.76	1	8.33	3	14.97	1	13.49	2	5	5
Bremerton-Silverdale, WA MSA	Limited Scope	10.00	4	21.24	1	16.43	2	18.65	1	17.85	2	23.81	2

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Centralia, WA Non-Metro	Limited Scope	7.73	4	21.07	1	21.07	1	18.6	1	15.82	3	35.48	1
Ellensburg, WA Non-Metro	Limited Scope	9.08	5	15.46	1	9.09	4	15.88	1	23.27	1	32.56	1
Kennewick-Pasco-Richland, WA MSA	Limited Scope	1.45	15	24.62	1	10.16	3	21.31	1	5.19	8	4.18	7
Mount Vernon-Anacortes, WA MSA	Limited Scope	7.05	7	22.02	1	8.4	4	20.71	1	17.46	2	12.31	4
Okanogan County, WA Non-Metro	Limited Scope	19.48	3	25.37	1	25.37	1	24.21	1	35.85	1	40.18	1
Olympia, WA MSA	Limited Scope	5.29	7	24.94	1	18.22	1	20.79	1	12.18	2	18.18	4
Olympic-Islands, WA Non-Metro	Limited Scope	9.61	3	18.35	1	17.55	1	17.67	1	20.27	2	46.15	1
Spokane, WA MSA	Limited Scope	8.32	5	19.98	1	13.74	2	18.6	1	12.13	2	27.59	2
Tacoma, WA MD	Limited Scope	13.56	4	22.64	1	16.88	1	19.53	1	14.93	3	38.24	1
Wenatchee-East Wenatchee, WA MSA	Limited Scope	11.57	2	22.08	1	11.03	2	19.24	1	18.78	2	35.33	1
Yakima, WA MSA	Limited Scope	8.07	5	18.08	1	12.7	2	12.7	2	13.22	3	23.87	1
<b>WISCONSIN</b>													
Green Bay, WI MSA (FS)	Full Scope	6.62	4	18.31	1	4.49	5	14.11	2	14.19	2	7.6	3
La Crosse, WI MSA (FS)	Full Scope	14.21	2	7.89	3	4.23	8	7.32	3	26.96	1	28.57	2
Milwaukee-Waukesha-West Allis, WI MSA (FS)	Full Scope	2.68	5	17.27	1	10.05	3	14.54	1	5.56	7	7.06	4
Appleton, WI MSA	Limited Scope	7.56	5	14.57	1	2.62	7	6.36	4	8.89	4	2.76	6

	Type of Exam	Deposit		Home Purchase		Home Improvement		Refinance Loans		Small Loans to Businesses		Small Loans to Farms	
Rating Area		% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank	% Market Share	Rank
Baraboo, WI Non-Metro	Limited Scope	4.59	6	14.05	2	7.09	5	14.45	1	14.7	2	14.47	3
Eau Claire, WI MSA	Limited Scope	8.85	5	10.99	2	4.07	8	9.36	2	17.03	2	5.5	4
Fond du Lac, WI MSA	Limited Scope	1.54	14	11.58	1	4.55	8	7.99	4	4.8	6	3.14	4
Madison, WI MSA	Limited Scope	2.08	11	12.37	1	3.37	8	9.04	2	6.73	5	9.59	3
Manitowoc, WI Non-Metro	Limited Scope	2.75	8	13.84	2	6.87	5	9.41	3	8.5	4	5.88	5
Marinette, WI Non-Metro	Limited Scope	0.92	11	15.25	1	6.52	5	13.46	1	11.85	3	8.33	2
Northern WI Non-Metro	Limited Scope	10.12	5	13.29	1	7.14	5	12.83	2	21.48	1	24	2
Oshkosh-Neenah, WI MSA	Limited Scope	1.28	13	15.46	1	1.36	11	9.7	2	6.01	6	9.43	5
Racine, WI MSA	Limited Scope	8.18	3	15.85	1	10.06	4	10.64	3	5.12	9	2.7	5
Sheboygan, WI MSA	Limited Scope	16.70	2	13.31	1	4.14	6	11.99	1	16.61	2	12.38	3
Wausau, WI MSA	Limited Scope	0.82	18	6.39	4	2.33	12	4.69	6	3.72	8	10	2
<b>WYOMING</b>													
Western WY Non-Metro (FS)	Full Scope	26.96	1	22.27	1	15.42	1	23.22	1	27.59	1	37.12	2
Casper, WY MSA	Limited Scope	21.32	3	12.8	3	14.29	3	20.31	1	20.63	1	24.14	2
Cheyenne, WY MSA	Limited Scope	20.54	1	10.17	4	7.96	4	7.96	4	23.21	1	38.78	1
Eastern WY Non-Metro	Limited Scope	7.16	4	11.07	3	13.24	2	15.7	1	17.82	2	12.08	2