



2011 Linked Deposit Banking Report to the Mayor



CITY OF BOSTON





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The State of Banking in the City of Boston



Introduction: 2011

After years of increasing foreclosures and housing trouble, 2011 saw the first signs of sustained rebuilding and recovery in Boston's housing market. The ongoing foreclosure crisis that started in 2006 peaked in 2010; but in 2011 the housing crisis finally showed signs of subsiding.

The groundbreaking measures taken in Massachusetts and in Boston from 2007-2009 to create a healthy and sound lending environment saw their first positive impact in 2011: steep drops in foreclosure activity, successful management of abandoned and distressed buildings, and the stabilization of housing values.

The crisis is far from over — the subprime mortgages originated in 2005-2006 are still defaulting at extremely high levels, and repeated intervention has only slowed, but not prevented, the foreclosure process. However, thanks to vigorous local action, the foundations are in place for a healthy lending environment and a sustained recovery in Boston and in Massachusetts, largely due to the expanding influence and importance of the CRA.

The Beginnings of Recovery

2011 saw the beginning of recovery from the mortgage and foreclosure crisis that began in 2006. This crisis originated in 2005 and 2006, in the confluence of high housing prices, high unemployment, low but rising interest rates, and — most importantly — the rise of out-of-state mortgage companies. These companies ushered in an array of risky mortgage loans, targeted to minority and low-income borrowers, including interest-only mortgages, adjustable-rate loans, and high-fee subprime loans. Many began at a low introductory rate, then reset to higher monthly payments. Even fixed-rate loans often required monthly payments that were unsustainable for the borrowers. Falling home prices¹ and a sluggish housing market have made it more difficult for homeowners unable to pay

their mortgages to refinance or to sell and pay off their debts.

2011 saw significant improvements in many of the key metrics used to measure the foreclosure crisis. In Boston, the number of petitions to foreclose, the first step in the foreclosure process, fell by over 50% from 2010 to 2011. Foreclosure deeds fell over 36%, to 525—down from a peak of 1215 in 2008.² At the same time, thanks to Mayor Menino's multi-pronged distressed-building strategy, the number of distressed (i.e., abandoned) residential buildings in Boston reached an all-time low in 2011. This contributed to stabilizing housing values.³

The foreclosure crisis in Boston is far from over, but 2011 saw signs of abating crisis and sustained recovery.

Failure of Remedies

Despite these positive signs in 2011, the foreclosure crisis is far from over. The root cause of this continuation is the failure of remedies to address the mortgages that are at the heart of the crisis.

The subprime lending market collapsed in 2008-2009, and subprime loans now make up a very small percentage of loans originated in Boston. But the impact of this lending is still being felt: according to Boston Department of Neighborhood Development (DND), the average time between mortgage origination and petition to foreclose was 3.0 years in 2009, 4.2 years in 2010, and 5.1 years in 2011. In other words, the risky mortgages originated at the height of the lending bubble of 2005-2007 still make up the bulk of foreclosures in Boston, even five years later.

According to Jim Campen of the Massachusetts Community & Banking Council, "an extraordinarily high proportion of subprime loans has resulted in delinquencies and foreclosures." At year-end 2010, for example, 55% of all subprime loans that have not already been foreclosed on were delinquent in their

¹ Boston-area housing prices have tumbled 22% between 2007 (median price \$414,700) and 2011 (median price \$322,100).

² City of Boston Department of Neighborhood Development, *Foreclosure Trends Report 2011*.

³ City of Boston Department of Neighborhood Development, *Distressed Building Report 2011*.



payments; 24% were more than 90 days delinquent; and 13.4% were in foreclosure.⁴

A number of national and state actions have attempted to stem the tide of these foreclosures. A few have been successful in slowing the processing of foreclosures by lenders, but none has been able to remedy the underlying problems that led to the foreclosures. This speaks to both the failure of administrative remedies to systemic issues, and to the resistance of many lenders to local, state, and national pressure.

The federal government's main foreclosure-prevention initiative, the Federal Loan Modification Program, began in early 2009 as part of the American Recovery and Reinvestment Act. By the end of the year it was already an acknowledged failure. Of 4 million homeowners eligible for mortgage modification, at the end of 2010 only 600,000 had received a trial modification, and only a small percentage of those had been made permanent.⁵ A study by the Federal Reserve Bank of Boston revealed that the low number of permanent modifications was the result of "lenders that are averse to working out the troubled loans," and that furthermore, "most modifications entailed increases in the principal balance of a mortgage."⁶

Locally-based loan modification programs have also failed, though pending legislation introduced by Mayor Menino will, if passed, force engagement by requiring mediation for all foreclosures in Boston.

State and local actions (including legislation and a lawsuit in the Supreme Judicial Court) have focused on the technicalities of foreclosures, especially on the paperwork and chain-of-title issues. These, along with extensions of the right-to-cure from 30 to 90, and then to 150 days, have

slowed the process but done little to change the underlying issues — i.e., borrowers owing more for their homes than they can afford to pay back.⁷

Strengthened Foundations

Despite the failures of these administrative efforts to address the troubled mortgages, efforts to create a more sound and fair lending landscape in Boston have been extremely effective. Particularly in Boston and in Massachusetts, aggressive state and local action has laid the foundation for long-term stability and increased access to fair credit for traditionally underserved borrowers.

The problematic lending practices that led to the crisis have all but disappeared from the Massachusetts lending landscape. Most notably, subprime lending has all but disappeared in Boston. In 2006, subprime lending comprised 22% of loans statewide, and 25% of loans in Boston. In 2011, they comprised just 0.3% of all loans in Boston. Only 34 subprime loans were originated in Boston in 2011, down from 3,361 loans in 2006.⁸ This change alone eliminates one of the major causes of the housing crisis.

The collapse of subprime lending has been accompanied by a dramatic increase in the ratio of lending by Massachusetts banks and credit unions, and a corresponding drop in lending by out-of-state banks and mortgage companies, the companies most likely to make risky or unsound loans. In 2010, Massachusetts banks and credit unions made 43.3% of all home purchase loans in Boston — more than twice as many as they made in 2005, when they made only 19.7%.⁹

These changes have laid the foundations for strength in Boston's lending markets. The kinds of loans that caused the foreclosure crisis have

⁴ Jim Campen, Massachusetts Banking & Community Council, Changing Patterns XIX.

⁵ ONLY ABOUT 4% GET LONG-TERM MORTGAGE HELP, CNN Money, December 10 2009; LENDER WILL SLASH MORTGAGE AMOUNTS, Boston Globe, March 25 2010.

⁶ Adelino et al., Federal Reserve Bank of Boston, Why Don't Lenders Renegotiate More Home Mortgages? Redefaults, Self-Cures, and Securitization: emphasis ours.

⁷ See, for example, 50 STATE ATTORNEYS GENERAL TO VET FORECLOSURE PROCESS, Boston Globe, Oct 14 2010; DROP IN MASS. FORECLOSURES TIED TO FEWER SEIZURES, Boston Globe, March 4 2011; BIG LENDERS CUT FORECLOSURES IN MASS. BY 40 PERCENT IN NOV., Boston Globe, December 30 2010; LENDER WILL SLASH MORTGAGE AMOUNTS, Boston Globe, March 25, 2010.

⁸ Changing Patterns XIX.

⁹ Changing Patterns XIX.



disappeared from the market, and the most responsible group of lenders — Massachusetts banks — is now originating almost half of all loans.

One indicator of the strength of Boston’s current lending market is the relative share of government-backed loans — housing loans guaranteed by the FHA, VA, or USDA. A high prevalence of these loans indicates that borrowers are having trouble accessing traditional credit. Government-backed loan shares are substantially lower in Massachusetts than they are nation-wide: these loans comprise 26.1% of home loans nationally, and only 11.7% in Massachusetts and 9.2% in Boston.¹⁰ This demonstrates that borrowers in Massachusetts, and especially in Boston, are finding it substantially easier than their peers in other states to access conventional credit — showing that lending in Boston is healthier, more robust, and more sustainable than in other parts of the country.

Boston is still dealing with fallout from the lending practices of 2000-2006, but the lending environment now is radically different and more healthy — and in Boston, responsible credit is substantially more accessible than in other parts of the country.

The Increased Importance of the CRA

This positive change in the Massachusetts lending landscape is the result of a number of factors, including market changes that removed the secondary market for subprime loans, local regulation, and federal legislation. New laws, including the Dodd-Frank Act and several Massachusetts statutes, added new requirements for increased disclosure by home mortgage lenders, stricter underwriting standards, and the banning of certain loan features deemed predatory.

However, the legislative change most likely to have a lasting impact on home mortgage lending in Boston is the dramatic expansion in the share of home mortgage lending now covered by the CRA or CRA-type oversight.

The historical success of the CRA provided a model for Massachusetts legislators seeking to expand oversight over non-bank licensed mortgage lenders. The 2007 “Act Protecting and Preserving Homeownership,” championed by Mayor Menino of Boston, provides for CRA-type oversight of mortgage lending companies that made 50 or more loans in Massachusetts in the previous year.

Like CRA ratings, these “CRA for Mortgage Lenders” ratings are made public, and unsatisfactory ratings may result in the loss of the lender’s license. Evaluations are now conducted regularly, and have already resulted in six Cease and Desist Orders or Consent Orders, after examination revealed unfair and deceptive business practices.¹¹

This expansion of CRA-type oversight to non-bank mortgage companies, combined with the dramatically increased lending share of Massachusetts banks, has allowed the CRA to once again become one of the key tools for establishing and maintaining a fair and healthy lending environment in Massachusetts.

In 2006, the CRA covered only 22% of all home loans in Massachusetts. In 2011, 75.1% of home loans are covered by the CRA or by CRA-type oversight.¹²

This expansion is important because historically the chief impediment to the effectiveness of the CRA has been its limited scope. The CRA has been tremendously effective among the institutions it governs, but its impact has been shackled by the low number of loans it controls. Because CRA regulation applies only to banks that maintain in-state branches, the rise of mortgage companies and out-of-state lenders had stripped the act of much of its effectiveness.

Though the CRA still regulates less than half of mortgage lending in the state, it now covers its greatest market share in more than a decade, and shows signs of increasing further. This prominent shift back to bank-based lending in 2009-2011, combined with the expansion of CRA-type regulation to previously under-

¹⁰ Changing Patterns XIX.

¹¹ CRA for Mortgage Lenders - Ratings and Public Evaluations Website, Massachusetts Division of Banks.

¹² Changing Patterns XIX.



regulated mortgage companies, gives new importance and influence to the CRA as a regulator of lending activity in Massachusetts.

Positive Impact of the CRA

This expansion in the reach of the CRA is important and encouraging because the CRA has been singularly successful in driving access to fair credit for borrowers of all income levels.

In Massachusetts, during the subprime lending boom, lenders not covered by the CRA were more than twice as likely to originate subprime loans as were CRA-regulated institutions, and were more likely to direct those subprime loans to minority applicants.¹³

Institutions governed by the CRA in 2010 “directed a substantially greater share of their total loans as prime loans — and a substantially smaller share of their total loans as government-backed loans — to every one of the categories of traditionally underserved borrowers and neighborhoods... than did lenders not covered by the CRA.”¹⁴

Lenders covered by the CRA extend a greater share of their loans to minority applicants, to low- and moderate-income census tracts, and to low- and moderate-income individuals, than do lenders not covered by the CRA. CRA-covered lenders also direct a greater share of conventional prime loans (as opposed to government-backed loans) to all of these categories of traditionally underserved borrowers.

The success of CRA lenders in providing for traditionally underserved populations throws into relief the failure of lenders not under the CRA’s jurisdiction to do so — and emphasizes the continuing importance of CRA oversight and reporting.

Future Questions

Overall, the expanded impact of the CRA, plus local activism and legislation, have transformed Boston’s mortgage lending market, giving it

systemic strength well beyond the national average.

There are, however, underlying issues that are still unresolved. In particular, access to conventional credit for low-income and minority borrowers remains a problem in Boston.

Black and Latino borrowers in Boston received significantly fewer conventional loans than white borrowers. For example, in Boston, 21% of households are black, but in 2011, black borrowers received only 4.5% of non-government back loans. Even upper-income census tracts, minorities were far more likely than white borrowers to receive a government-backed loan.¹⁵

In Boston, the government-backed loan share in low-income census tracts was 19%, versus just 4% in upper-income census tracts. The government-backed loan share in predominantly minority neighborhoods was 44%, versus 13% in predominantly white census tracts. Black and Latino borrowers still face disproportionately high denial rates, even when adjusted for income.¹⁶

These patterns mirror the prime-versus-subprime lending divisions that existed in the years before the disappearance of subprime lending. Government-backed loans are affordable and sustainable, but their prevalence among minorities and in lower-income census tracts is an indication that minority and lower-income borrowers are still facing access-to-credit issues. This is of continuing concern because if government-backed lending dries up, there could be a return to redlining and other unfair lending practices that once characterized the market and which led to the foreclosure crisis.

This serves to emphasize the continued importance of the CRA. Even as Boston emerges from the housing crisis, the issues the CRA was originally created to address are still with us. Only vigilance and oversight can ensure fair access to credit for all the residents of the City of Boston.

¹³ Jim Campen, Massachusetts Banking & Community Council, Changing Patterns XVI.

¹⁴ Changing Patterns XVIII.

¹⁵ Changing Patterns XIX.

¹⁶ Changing Patterns XIX.



2011 Boston MSA Comparative Charts

The charts on the following three pages give different views of the mortgage-lending activity in the Boston Metropolitan Statistical Area (MSA).

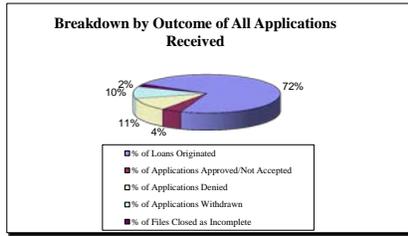
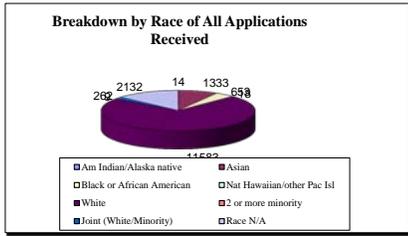
In the first two charts, lending totals of all lenders (the lenders listed in this report are a subset of this total) in the MSA is broken down by race for HMDA and low-income mortgages respectively. These charts include all HMDA and low-income mortgages within the MSA.

The third chart totals all HMDA and low-income reportable mortgages, by race, for the banks listed in this report compared against the entire MSA.

Aggregate Lending Information - HMDA MSA: 14484 - Boston/Quincy, MA 2011

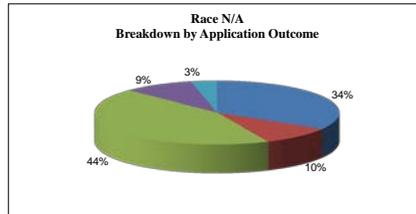
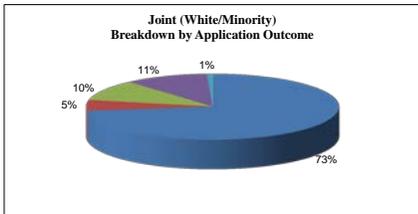
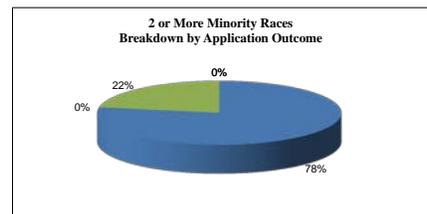
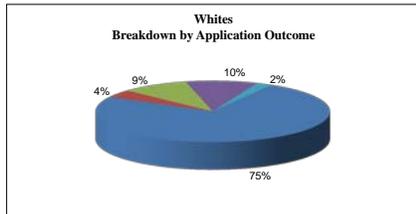
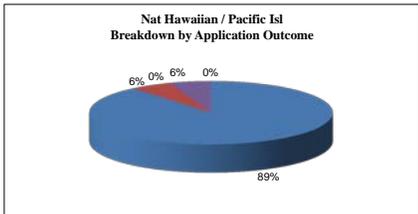
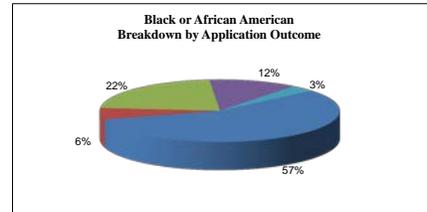
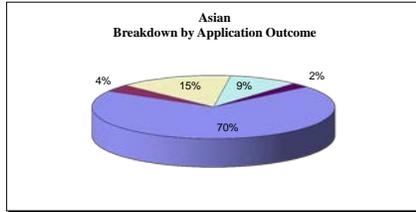
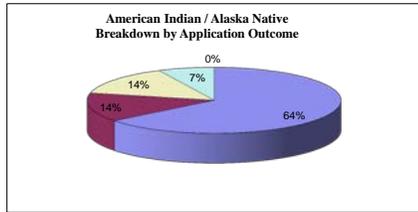
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	14	0%	9	64%	2	14%	2	14%	1	7%	0	0%
Asian	1333	8%	927	70%	49	4%	202	15%	124	9%	31	2%
Black or African American	653	4%	369	57%	39	6%	145	22%	78	12%	22	3%
Nat Hawaiian/other Pac Isl	18	0%	16	89%	1	6%	0	0%	1	6%	0	0%
White	11583	72%	8632	75%	473	4%	1080	9%	1149	10%	249	2%
2 or more minority	9	0%	7	78%	0	0%	2	22%	0	0%	0	0%
Joint (White/Minority)	262	2%	191	73%	14	5%	27	10%	28	11%	2	1%
Race N/A	2132	13%	1438	67%	127	6%	234	11%	247	12%	86	4%
Total	16004	100%	11589	72%	705	4%	1692	11%	1628	10%	390	2%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

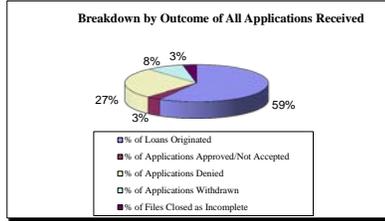
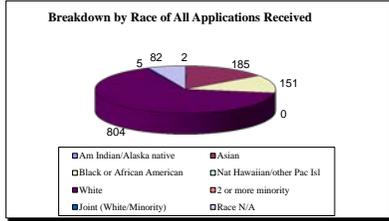


- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

Aggregate Low-Income Mortgage Lending MSA: 14484 - Boston/ Quincy, MA 2011

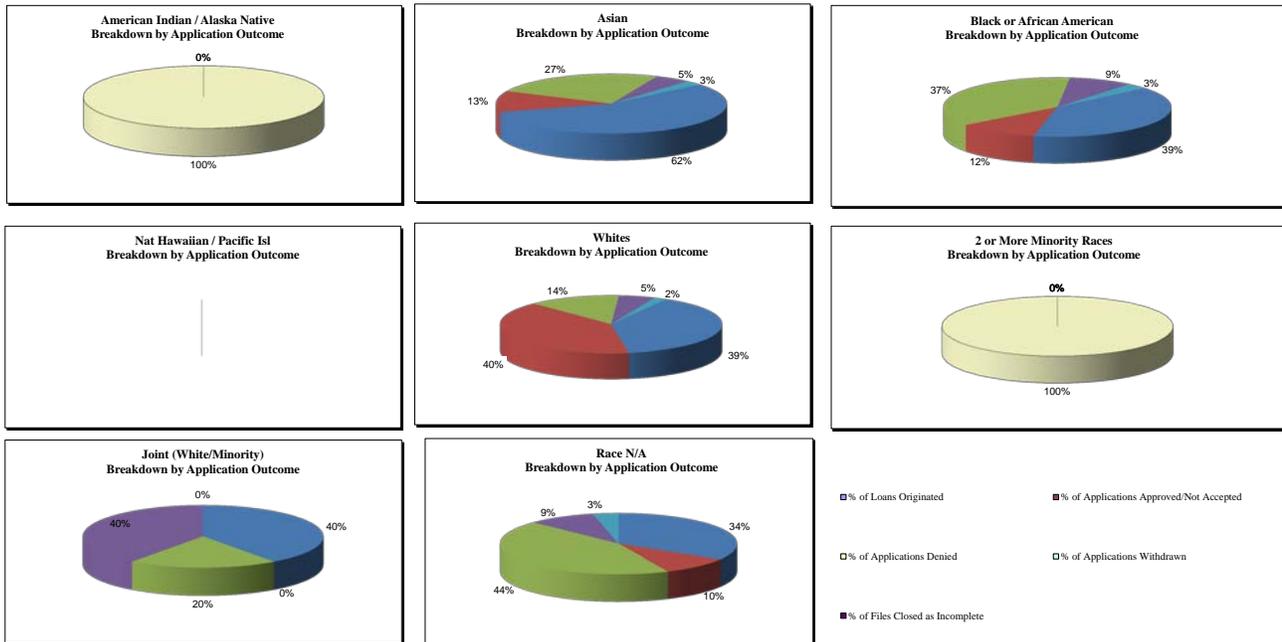
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	2	0%	0	0%	0	0%	2	100%	0	0%	0	0%
Asian	185	15%	115	62%	5	13%	50	27%	10	5%	5	3%
Black or African American	151	12%	65	43%	5	13%	61	40%	15	10%	5	3%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	804	65%	509	63%	26	65%	175	22%	69	9%	25	3%
2 or more minority	1	0%	0	0%	0	0%	1	100%	0	0%	0	0%
Joint (White/Minority)	5	0%	2	40%	0	0%	1	20%	2	40%	0	0%
Race N/A	82	7%	29	35%	4	10%	38	46%	8	10%	3	4%
Total	1230	100%	720	59%	40	3%	328	27%	104	8%	38	3%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

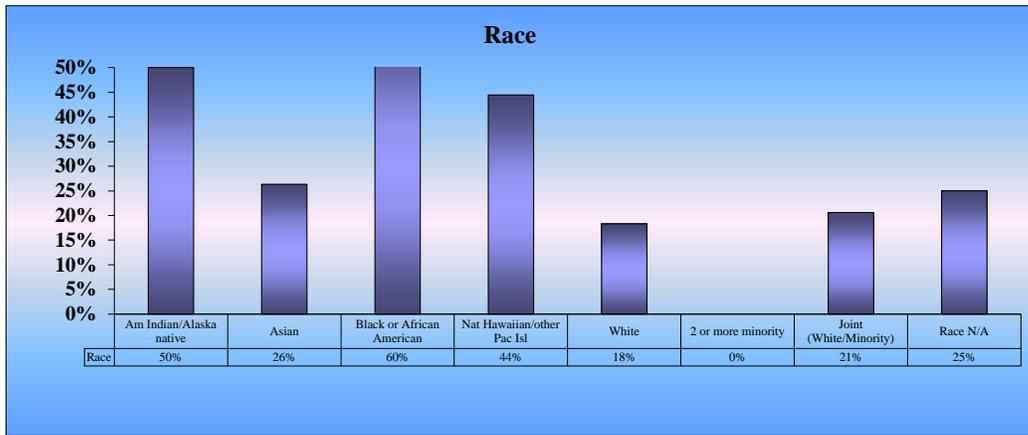


Link Deposit Report Banks Compared Against the MSA Aggregate Total 2011

HMDA Mortgage Information for Banks covered in this report

Race	Applications Received by banks	% of Applications Received in MSA	Loans Originated by banks	% of Loans Originated in MSA	Applications Approved/Not Accepted by banks	% of Applications Approved/Not Accepted in MSA	Applications Denied by banks	% of Applications Denied in MSA	Applications Withdrawn by banks	% of Applications Withdrawn in MSA	Files Closed as Incomplete by banks	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	7	50%	5	56%	1	50%	0	0%	1	100%	0	0%
Asian	351	26%	232	25%	7	14%	70	35%	34	27%	8	26%
Black or African American	394	60%	226	61%	21	54%	94	65%	47	60%	6	27%
Nat Hawaiian/other Pac Isl	8	44%	8	50%	0	0%	0	0%	0	0%	0	0%
White	2119	18%	1515	18%	68	14%	286	26%	202	18%	38	15%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	54	21%	34	18%	6	43%	8	30%	6	21%	0	0%
Race N/A	533	25%	314	22%	39	31%	95	41%	72	29%	13	15%
Total	3466	22%	2334	20%	142	20%	553	33%	362	22%	65	17%

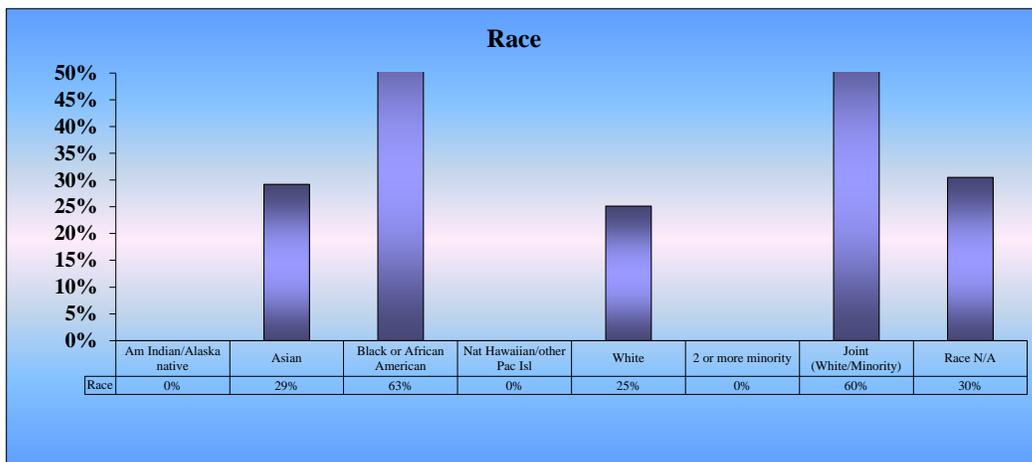
The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered in this report (excluding Mellon) compared to the total number of Asian applications processed in the MSA.



Low-Income Mortgage Information for Banks covered in this report

Race	Applications Received by banks	% of Applications Received in MSA	Loans Originated by banks	% of Loans Originated in MSA	Applications Approved/Not Accepted by banks	% of Applications Approved/Not Accepted in MSA	Applications Denied by banks	% of Applications Denied in MSA	Applications Withdrawn by banks	% of Applications Withdrawn in MSA	Files Closed as Incomplete by banks	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	54	29%	35	30%	0	0%	16	32%	3	30%	0	0%
Black or African American	95	63%	45	69%	1	20%	40	66%	8	53%	1	20%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	202	25%	124	24%	5	19%	55	31%	14	20%	4	16%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	3	60%	2	100%	0	0%	0	0%	1	50%	0	0%
Race N/A	25	30%	10	34%	0	0%	13	34%	2	25%	0	0%
Total	379	31%	216	30%	6	15%	124	38%	28	27%	5	13%

The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered in this report (excluding Mellon) compared to the total number of Asian applications processed in the MSA.







Ratings Summary



Summary

Note: Information in this section is summary only. Expanded information on all financial institutions is contained in the subsequent sections. (See sections 3 to 17.)

FDIC Review Schedule

The Federal Deposit Insurance Corporation (FDIC) conducts a CRA examination according to the following schedule:

For banks with assets of less than \$250 million the schedule is:

- Previous rating OUTSTANDING, next review in 60-72 months
- Previous rating SATISFACTORY, next review in 48-60 months
- Previous rating NEEDS IMPROVEMENT, next review in 12-24 months
- Previous rating SUBSTANTIAL NON-COMPLIANCE, next review in 12 months

For banks with assets of more than \$250 million the schedule is:

- Previous rating OUTSTANDING, next review in 24-36 months
- Previous rating SATISFACTORY, next review in 24-36 months
- Previous rating NEEDS IMPROVEMENT, next review in 12-24 months
- Previous rating SUBSTANTIAL NON-COMPLIANCE, next review in 12 months

OCC and OTS Review Schedule

In general, the Office of the Comptroller of the Currency (OCC) and the Office of Thrift Supervision (OTS) conduct a CRA examination of a bank every 24 months.

Overall Rating

The following overall Community Reinvestment Act (CRA) ratings¹ are for the year 2011.

Bank	Rating
Bank of America	OUTSTANDING
Bank of New York Mellon	SATISFACTORY
Blue Hills Bank	SATISFACTORY
Boston Private Bank	OUTSTANDING
Cathay Bank	SATISFACTORY
Century Bank and Trust (Century Bank)	SATISFACTORY
Citizens Bank of Massachusetts	OUTSTANDING
Commonwealth Cooperative Bank	SATISFACTORY
East Boston Savings Bank (EBSB)	SATISFACTORY
Eastern Bank	OUTSTANDING
First Trade Union Bank	SATISFACTORY
JPMorgan Chase Bank	OUTSTANDING
OneUnited Bank	NEEDS TO IMPROVE
Sovereign Bank	OUTSTANDING
TD Bank	OUTSTANDING
Webster Bank	OUTSTANDING

¹ See Appendix for rating definitions.



Overall and Test Ratings

The following are the ratings for the three test areas (Lending, Investment, and Service) utilized by the CRA regulatory bodies.

Bank of America²

Regulatory Body:	Office of the Comptroller of the Currency	
Area Tested	Rating	
Overall:	OUTSTANDING	
Lending:	OUTSTANDING	
Investment:	OUTSTANDING	
Service:	OUTSTANDING	

Bank of New York Mellon³

Regulatory Body:	Federal Reserve Bank of New York	
Area Tested	Rating	
Overall:	SATISFACTORY	
Lending:	NOT ASSESSED	
Investment:	NOT ASSESSED	
Service:	NOT ASSESSED	

Blue Hills Bank⁴

Regulatory Body:	Federal Deposit Insurance Corporation	
Area Tested	Rating	
Overall:	SATISFACTORY	
Lending:	SATISFACTORY	
Investment:	OUTSTANDING	
Service:	OUTSTANDING	

Boston Private Bank & Trust Company⁵

Regulatory Body:	Federal Deposit Insurance Corporation	
Area Tested	Rating	
Overall:	OUTSTANDING	
Lending:	OUTSTANDING	
Investment:	OUTSTANDING	
Service:	OUTSTANDING	

Cathay Bank⁶

Regulatory Body:	Federal Deposit Insurance Corporation	
Area Tested	Rating	
Overall:	SATISFACTORY	
Lending:	HIGH SATISFACTORY	
Investment:	LOW SATISFACTORY	
Service:	HIGH SATISFACTORY	

Century Bank & Trust⁷

Regulatory Body:	Federal Deposit Insurance Corporation	
Area Tested	Rating	
Overall:	SATISFACTORY	
Lending:	HIGH SATISFACTORY	
Investment:	LOW SATISFACTORY	
Service:	HIGH SATISFACTORY	

² Based on most recent CRA Performance Evaluation by OCC published 2009.

³ Based on most recent CRA Performance Evaluation published by Federal Reserve Bank of New York published 2011.

⁴ Based on most recent CRA Performance Evaluation By FDIC published 2012.

⁵ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁶ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁷Based on most recent CRA Performance Evaluation by FDIC published 2011.



RBS Citizens Bank of Massachusetts⁸

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	OUTSTANDING
Service:	OUTSTANDING

Eastern Bank¹¹

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	HIGH SATISFACTORY
Investment:	OUTSTANDING
Service:	OUTSTANDING

Commonwealth Cooperative Bank⁹

Regulatory Body:	Office of Thrift Supervision
Area Tested	Rating
Overall:	SATISFACTORY
Lending:	NOT RATED
Investment:	NOT RATED
Service:	NOT RATED

First Trade Union Bank¹²

Regulatory Body:	Office of the Comptroller of the Currency
Area Tested	Rating
Overall:	SATISFACTORY
Lending:	OUTSTANDING
Investment:	NOT RATED
Service:	NOT RATED

East Boston Savings Bank¹⁰

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	SATISFACTORY
Lending:	HIGH SATISFACTORY
Investment:	SATISFACTORY
Service:	HIGH SATISFACTORY

JPMorgan Chase Bank¹³

Regulatory Body:	Office of the Comptroller of the Currency
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	HIGH SATISFACTORY
Service:	HIGH SATISFACTORY

⁸Based on most recent CRA Performance Evaluation by OCC published 2007.

⁹ Banks that are considered small to medium are only given one rating by the Federal Deposit Insurance Corporation as their review criteria differs from the larger banking institutions. Based on most recent CRA Performance Evaluation by OTS published 2008.

¹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹¹ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹² Based on most recent CRA Performance Evaluation by OCC published 2011.

¹³ Based on most recent CRA Performance Evaluation published by OTC published 2007.



OneUnited Bank¹⁴

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	NEEDS TO IMPROVE
Lending:	SUBSTANTIAL NONCOMPLIANCE
Investment:	NOT RATED

Sovereign Bank (Massachusetts)¹⁵

Regulatory Body:	Office of Thrift Supervision
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	HIGH SATISFACTORY
Service:	OUTSTANDING

TD Bank¹⁶

Regulatory Body:	Office of the Comptroller of the Currency
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	HIGH SATISFACTORY
Service:	HIGH SATISFACTORY

Webster Bank¹⁷

Regulatory Body:	OCC
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	HIGH SATISFACTORY
Investment:	OUTSTANDING
Service:	OUTSTANDING

¹⁴ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹⁵ Based on most recent CRA Performance Evaluation by OTS published 2010.

¹⁶Based on most recent CRA Performance Evaluation by OCC published 2008.

¹⁷Based on most recent CRA Performance Evaluation by OCC published 2011.





Bank of America



Bank of America Overview

Bank of America, N.A.
100 North Tryon Street
Charlotte, NC 28202

Description

Bank of America, N.A. is a \$1.46 trillion full-service interstate bank that operates throughout the United States and in 40 countries. The bank, headquartered in Charlotte, North Carolina, is a subsidiary of Bank of America Corporation. Bank of America is a component of the Dow Jones Industrial Average.

The bank has established 5,700 retail banking centers and over 17,750 ATMs – the largest ATM network in the country. Bank of America services 57 million consumer and small business relationships, and provides services to half of U.S. households. The bank offers a wide range of products and services directly or indirectly through affiliates. Community development initiatives are a major focus of the bank, particularly in its role as developer of affordable housing.

Bank of America entered the Massachusetts market in 2003, when it merged with Boston-based FleetBoston Financial. The merger was finalized in 2005. Bank of America, N.A. is currently the largest banking financial institution in Massachusetts.

In January 2008, the bank acquired Countrywide Financial Corporation. The bank acquired Merrill Lynch & Co., Inc. on January 1, 2009. Bank of America currently services 11.7 million home mortgage loans, more than any other financial institution.

Principal Officers

CEO

Brian T. Moynihan
100 North Tryon Street
Charlotte, NC 28202
704-386-5681

CFO

Bruce R. Thompson
100 North Tryon Street
Charlotte, NC 28202
704-386-5681

Chief Compliance Officer

Gary G. Lynch
100 North Tryon Street
Charlotte, NC 28202
704-386-5681

Employees

Number of Employees	182,060 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	5,700
Branches Within Boston MSA	35
Number of ATMs	17,750
Number of Free-Standing ATMs	12,050

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2009
Overall Rating for Boston MSA	OUTSTANDING²
Lending Test Rating for Boston MSA	OUTSTANDING
Investment Test Rating for Boston MSA	OUTSTANDING
Service Test Rating for Boston MSA	OUTSTANDING

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by OCC published 2009.



Discussion

Overall rating for Boston MSA: OUTSTANDING³

Bank of America received a CRA rating for both its nationwide banking activity, and for each state or MDA in which it operates.

In its nationwide evaluation, the bank received an assessment of “OUTSTANDING” both Overall and in every category test (the Lending, Investment, and Service tests).⁴

The OCC also examined the bank’s performance in the Boston-Cambridge-Quincy (MA-NH) Multistate MSA, where the bank also receives “OUTSTANDING” ratings in every category. **The discussion below focuses on the OCC’s evaluation of the bank’s performance in the Boston MSA.**

Lending Test

Lending Test Rating for Boston MSA: OUTSTANDING⁵

General Responsiveness to Credit Needs

Bank of America’s lending performance in the Boston MSA is rated Outstanding. The bank was ranked second in market share for home purchase loans in Boston among local deposit-taking institutions, and third in small business lending, during the assessment period.

In 2011, Bank of America originated \$152 billion in first mortgages nationwide, including \$35 billion for low- and moderate-income customers.⁶

The bank’s lending performance was excellent and had a positive impact on the local communities in which the bank operates.⁷

Responsiveness to Low- and Moderate-Income Credit Needs

Bank of America’s Boston MSA lending displayed excellent distribution of loans among borrowers of different income levels.⁸

During the evaluation period, economic conditions changed significantly and provided lending challenges. While Bank of America continues to tighten its product mix and underwriting criteria in response to the economic crisis, during the assessment period it maintained a focus on serving the community, especially low- and moderate-income families and geographies.⁹

Bank of America’s lending to low- and moderate-income geographies in the Boston MSA was excellent, among the strongest in the bank’s national footprint. The proportion of loans made in both low- and moderate-income geographies exceeds the percentage of owner-occupied units in these geographies. In addition, the bank’s market share of loans in both low- and moderate-income geographies exceeds the bank’s overall market share within Boston.

When considered by borrower income level, Bank of America’s home purchase loan borrower distribution in Boston is good. The proportion of loans originated to low-income borrowers exceeds the bank’s overall market share. The bank’s share of loans to moderate-income borrowers exceeds both the bank’s market share, and the percentage of moderate-income families in Boston.¹⁰

³ Based on most recent CRA Performance Evaluation by OCC published 2009.

⁴ Based on most recent CRA Performance Evaluation by OCC published 2009.

⁵ Based on most recent CRA Performance Evaluation by OCC published 2009.

⁶ Bank of America Annual Report 2011.

⁷ Based on most recent CRA Performance Evaluation by OCC published 2009.

⁸ Based on most recent CRA Performance Evaluation by OCC published 2009.

⁹ Ibid.

¹⁰ Ibid.



Leadership in Community Development

Loans

Bank of America’s level of community development lending, and the geographic distribution of its HMDA lending, were both excellent, earning the bank an Outstanding rating.

The economic crisis created a number of new challenges in community development during the CRA evaluation period, with lenders leaving the market and economic conditions making projects more difficult to fund. Bank of America remained committed to community development financing and continued to participate in complex transactions in major markets.

During the evaluation period, the bank originated 26 community development loans totaling \$84.4 million in the Boston MSA. Most of these loans were directed to affordable housing, and provided over 900 affordable housing units.¹¹

Bank of America is one of the country’s most significant community development lenders. In 2009, the bank announced a 10-year, \$1.5 trillion community development lending and investing goal, the largest of its kind ever established by a U.S. financial institution. This lending is targeted at providing capital to low- and moderate-income and minority families, businesses, and nonprofits to promote neighborhood revitalization. \$1 trillion of this money is designated for affordable housing. In 2011, the bank provided \$126.6 billion in community development loans against this commitment. The bank also extended \$49 billion in credit to nonprofit, government, and anchor institutions to support vital community resources.¹²

The bank also partners with community development financial institutions to provide financing and other assistance to businesses unable to qualify for traditional bank financing.¹³

Innovative & Flexible Lending Practices

Bank of America offered a number of special loan products with flexible underwriting standards that assisted the bank in meeting the needs of low- and moderate-income individuals and neighborhoods.

The bank also leverages partnerships with various non-profits and state and local organizations, such as NACA and the Massachusetts Housing Partnership, to help low- and moderate-income applicants achieve home ownership.¹⁴

However, it should be noted that since the most recent CRA evaluation, Bank of America has tightened its lending requirements and discontinued many of its mortgage lending products as part of an overall strategy to streamline the bank’s mortgage product line and reduce exposure to the home mortgage market.¹⁵

Investment Test

Investment Test Rating for Boston MSA: OUTSTANDING¹⁶

Investment activity reflected an excellent level of responsiveness to the needs of the communities where Bank of America operates. The bank took a leadership role in developing and participating in investments that were complex and involved multiple partners with both public and private funding. Many investments served significant community development needs.

Despite the recession and the troubled housing markets in 2007-2010, Bank of America remained a stable, long-term provider of capital that created a positive impact for low- and moderate-income families and communities.

The bank’s Boston MSA investment volume reflects an excellent level of responsiveness to the needs of the area. Bank of America’s

¹¹ Ibid.

¹² Bank of America Corporate Social Responsibility Report 2011.

¹³ Bank of America Corporate Social Responsibility Report 2011.

¹⁴ Based on most recent CRA Performance Evaluation by OCC published 2009.

¹⁵ Bank of America Annual Report 2011.

¹⁶ Based on most recent CRA Performance Evaluation by OCC published 2009.



Investment Test performance in the Boston MSA is rated Outstanding.

Community Development Investments & Grants

Bank of America demonstrated significant leadership in its qualified investment activities.

In addition, the bank, through its community development corporation (CDC), was one of the few financial institutions that acted as a direct developer of large-scale affordable multifamily housing projects in low- and moderate-income urban areas.¹⁷ In 2011, the bank invested \$1.6 billion to create 11,000 affordable housing units nationwide.¹⁸

The bank ranks among the most significant debt providers to Low Income Housing Tax Credit (LIHTC) projects, and is the single largest investor in Community Development Financial Institutions in the country. As of 2011, the bank has over \$1 billion in loans and investments in more than 200 Community Development Financial Institutions (CDFI) in 40 states.¹⁹ CDFI investments were responsive to the needs of the bank’s communities and were targeted to small businesses, microenterprises, affordable housing, and community facilities.²⁰

\$200 million of the bank’s CDFI investment is designated for the support of small businesses, including businesses that do not qualify for traditional loans. The bank is also the first bank to provide capital in the Small Business Association’s Community Advantage Program, which supports CDFIs that lend to small businesses.²¹

Leadership was also demonstrated by the bank’s

¹⁷ Based on most recent CRA Performance Evaluation by FDIC published 2009.

¹⁸ Bank of America Corporate Social Responsibility Report 2011.

¹⁹ Bank of America website.

²⁰ Based on most recent CRA Performance Evaluation by OCC published 2009.

²¹ Bank of American Corporate Social Responsibility Report 2011.

cash contributions through its corporate philanthropic program. The bank’s Charitable Foundation gave \$200 million in cash donations in 2011. The bank has made an overall 10-year, \$2 billion charitable giving commitment.²² In 2011, the bank’s total Massachusetts giving totaled \$11.3 million.²³

In the Boston MSA, Bank of America made 328 investments totaling \$144.5 million during the assessment period. As of March 31, 2009, the bank’s community development investments in Boston totaled \$154.5 million.²⁴

In addition, Bank of America made Boston MSA investments totaling \$16 million in four CDFIs and \$15.9 million in bonds that supported affordable housing or revitalized or stabilized low- or moderate-income communities.

Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize low- and moderate-income geographies.²⁵

Service Test

**Service Test Rating for Boston MSA:
OUTSTANDING²⁶**

Bank of America’s provision of retail services showed excellent responsiveness to the banking needs of geographies and individuals of different income levels.²⁷

As community needs changed due to the economic crisis, the bank responded by shifting

²² Bank of America Annual Report 2009.

²³ Bank of America website.

²⁴ Based on most recent CRA Performance Evaluation by OCC published 2009.

²⁵ Ibid.

²⁶ Based on most recent CRA Performance Evaluation by OCC published 2009.

²⁷ Based on most recent CRA Performance Evaluation by OCC published 2009.



the focus of some of its CD services to foreclosure prevention in its most stressed areas. Bank employees participated in foreclosure prevention workshops and assisted non-profits in increasing capacity for mortgage counseling.²⁸

Description of Service-Delivery Systems

Bank of America’s retail service delivery systems in the Boston MSA are readily accessible to geographies and individuals of different income levels. The percentage of the bank’s branches in low-income geographies exceeds the percentage of the population residing in low-income areas. Bank hours and services do not vary in a way that inconveniences low- and moderate-income residents of Boston.

In 2009, the bank launched a number of online financial literacy tools focused on credit guidance and debt management.²⁹ It also introduced a “Clarity Commitment” aimed at promoting transparency in mortgage, home equity, and credit card lending.³⁰

In 2010, the bank equipped all of its ATMs with voice-enabled technology to provide access for visually-impaired customers.³¹

Community Development Services

Bank of America provided an excellent level of community development services that were responsive to the community development needs of its communities.³²

The bank is a leader in providing community development services in Boston. Services were provided to 23 organizations pursuing a variety of initiatives targeted at low- and moderate-income areas and individuals. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable

housing, community services, or activities that revitalize or stabilize lower-income geographies. The bank also provided homebuyer education services and loans to lower-income individuals through partnership with non-profit organizations.³³

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
60 State Street Boston MA 02109	✓	✓
6 Tremont Street Boston MA 02108	✓	✓
315 Washington Street Boston MA 02108	✓	✓
100 Federal Street Boston MA 02110	✓	✓
65 Franklin Street Boston MA 02110	✓	✓
125 High Street Boston MA 02110	✓	✓
260 Hanover Street Boston MA 02113	✓	✓
175 Federal Street Boston MA 02110	✓	✓
104 Canal Street Boston MA 02114	✓	✓
161 Cambridge Street Boston MA 02114	✓	✓
710 Washington Street Boston MA 02111	✓	✓
157 Stuart Street Boston MA 02116	✓	✓
210 Berkeley Street Boston MA 02116	✓	✓
557 Boylston Street Boston MA 02116	✓	✓
557 Tremont Street Boston MA 02118	✓	✓
699 Boylston Street Boston MA 02116	✓	✓
855 Boylston Street Boston MA 02116	✓	✓
460 W. Broadway Boston MA 02127	✓	✓
133 Massachusetts Avenue Boston MA 02115	✓	✓
636 East Broadway Boston MA 02127	✓	✓
285 Huntington Avenue Boston MA 02115	✓	✓

²⁸ Ibid.

²⁹ Bank of America Annual Report 2009.

³⁰ Bank of America website.

³¹ Bank of America website.

³² Based on most recent CRA Performance Evaluation by OCC published 2009.

³³ Bank of America website.



540 Commonwealth Avenue Boston MA 02215	✓	✓
1104 Massachusetts Avenue Dorchester MA 02125	✓	✓
114 Dudley Street Roxbury MA 02119	✓	✓
771 Commonwealth Avenue Boston MA 02215	✓	✓
333 Longwood Avenue Boston MA 02115	✓	✓
555 Columbia Rd. Dorchester MA 02125	✓	✓
1614 Tremont Street Boston MA 02120	✓	✓
315 Centre Street Jamaica Plain MA 02130	✓	✓
470 Blue Hill Avenue Dorchester MA 02121	✓	✓
1237 Commonwealth Avenue Boston MA 02134	✓	✓
1440 Dorchester Avenue Dorchester MA 02122	✓	✓
677 Centre Street Boston MA 02130	✓	✓
618 Washington Street Dorchester MA 02124	✓	✓
5 Chestnut Hill Avenue Brighton MA 02135	✓	✓
FSB: Full Service Branch		

Other Programs

Bank of America has been responsive in helping to meet the credit needs of its communities through its mortgage loan refinancing, restructuring, and modification programs. Foreclosure assistance was provided in all areas. This assistance was considered highly responsive to the needs of the areas where the bank operates.³⁴

Between January 2009 and December 2009, the bank made nearly 700,000 trial mortgage modifications, more than any other institution; however, by May 2010 only 62,969 modifications had been made permanent.³⁵

In 2010, the bank opened an office in Dedham, Massachusetts dedicated to helping homeowners seeking loan modifications.³⁶

In 2011, the bank made over 200,000 home mortgage modifications nationwide, or approximately one-third of all home mortgage modifications in the country.³⁷ This relative success, however, must be placed in the context of the broad failure of mortgage modification programs.³⁸

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Bank of America's Boston HMDA applications and originations fell sharply from 2009 to 2011. 2011 HMDA lending volume is less than 40% of 2009 levels.

The bank's low-income HMDA lending suffered a similar decline: from 2009 to 2011, low-income lending has fallen by 66%.³⁹

³⁴ Based on most recent CRA Performance Evaluation by OCC published 2009.

³⁵ Bank of America Annual Report 2009; Bank of America website.

³⁶ Bank of America website.

³⁷ Bank of America Annual Report 2011.

³⁸ See Introduction.

³⁹ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



	2009	2010	2011
HMDA Applications Received	2725	1691	1074
HMDA Loans Originated	1816	1051	673
Low-Income Applications Received	302	183	115
Low-Income Loans Originated	162	82	55

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	2.0%	1.8%	2.1%
Moderate	1.0%	0.7%	1.2%
Middle	1.4%	1.6%	1.8%
Upper	2.0%	2.0%	2.2%
Total	1.6%	1.4%	1.8%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	13.2%	13.6%	8.4%
Moderate	10.3%	6.7%	5.3%
Middle	8.9%	12.0%	11.0%
Upper	13.8%	16.1%	11.2%
Total	11.8%	12.1%	9.1%

Please refer to the addendum The 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Bank of America in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Bank of America Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; March 31, 2009.

Bank of America Annual Report, 2010 and 2011.

Bank of America 2011 Corporate Social Responsibility Report.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Institution Directory:

<http://www2.fdic.gov/idasp>

Bank of America website:

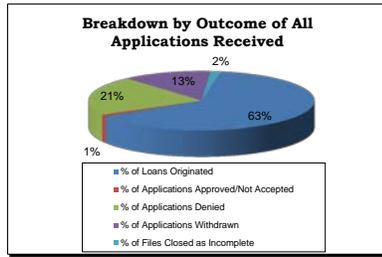
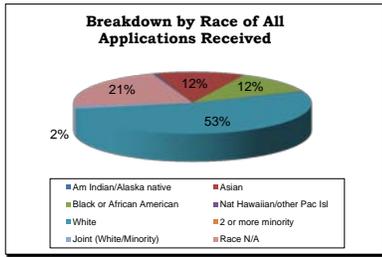
<http://www.bankofamerica.com>

Bank of America, N.A. HMDA Mortgage Lending

2011

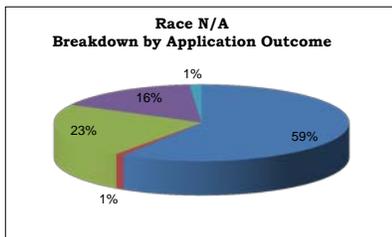
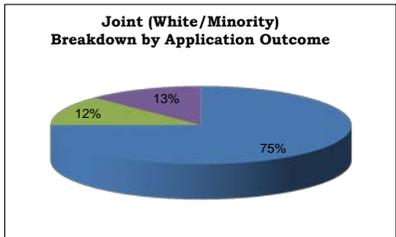
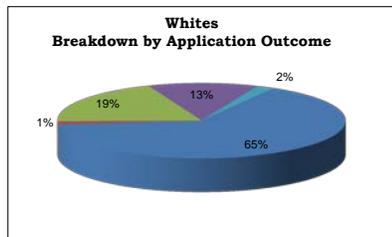
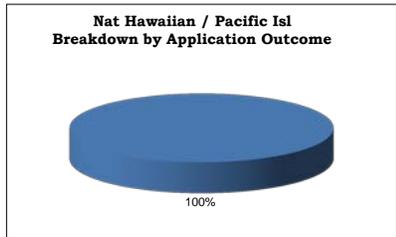
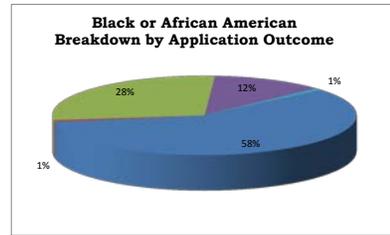
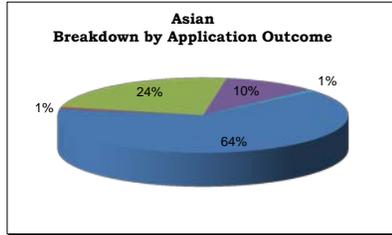
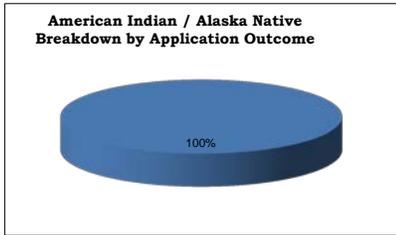
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	4	0%	4	100%	0	0%	0	0%	0	0%	0	0%
Asian	133	12%	85	64%	1	1%	32	24%	14	11%	1	1%
Black or African American	125	12%	73	58%	1	1%	35	28%	15	12%	1	1%
Nat Hawaiian/other Pac Isl	3	0%	3	100%	0	0%	0	0%	0	0%	0	0%
White	567	53%	363	64%	7	1%	107	19%	69	12%	11	2%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	16	1%	12	75%	0	0%	2	13%	2	13%	0	0%
Race N/A	226	21%	133	59%	2	1%	52	23%	36	16%	3	1%
Total	1074	100%	673	63%	11	1%	228	21%	136	13%	16	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



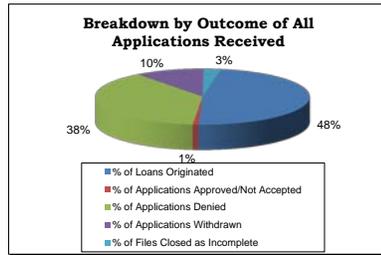
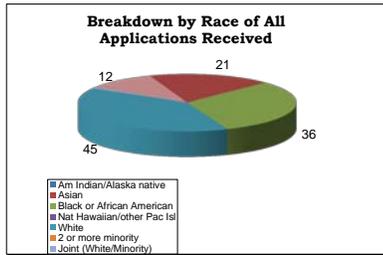
- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

Bank of America, N.A. Low-Income Mortgage Lending

2011

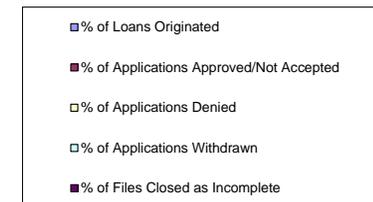
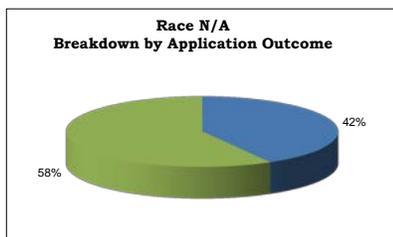
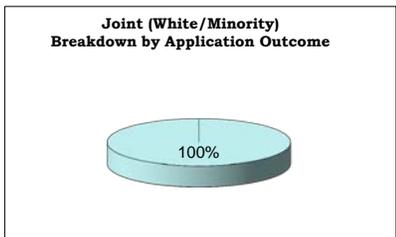
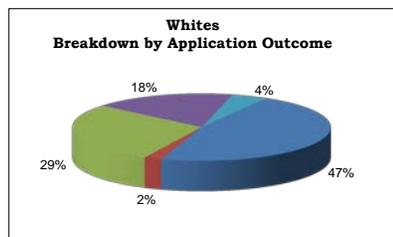
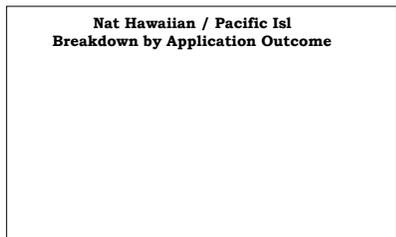
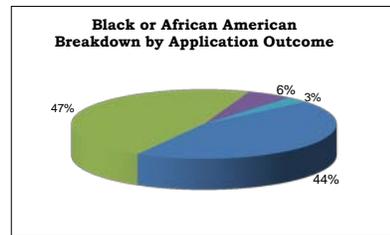
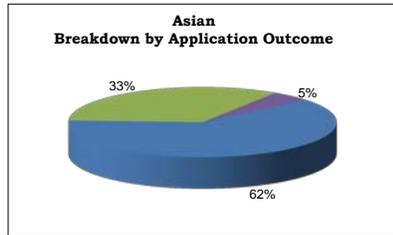
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	21	18%	13	62%	0	0%	7	33%	1	5%	0	0%
Black or African American	36	31%	16	44%	0	0%	17	47%	2	6%	1	3%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	45	39%	21	47%	1	2%	13	29%	8	18%	2	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	1%	0	0%	0	0%	0	0%	1	100%	0	0%
Race N/A	12	10%	5	42%	0	0%	7	58%	0	0%	0	0%
Total	115	100%	55	48%	1	1%	44	38%	12	10%	3	3%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



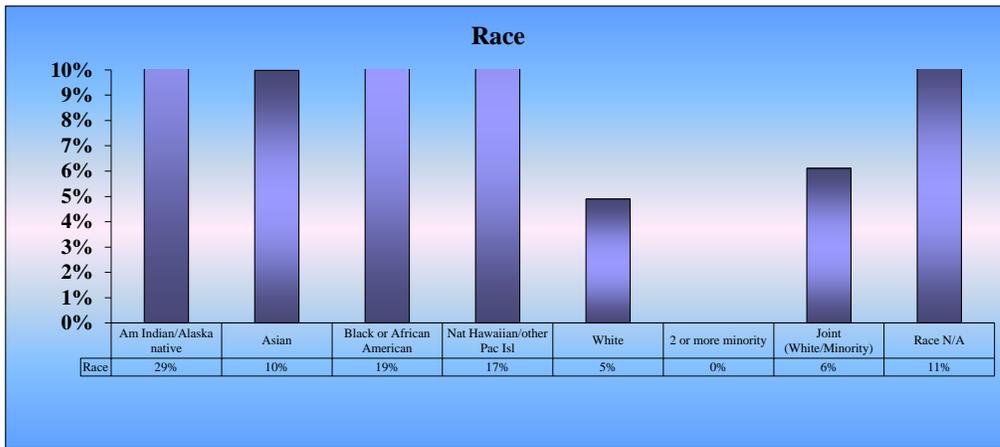
Compared against the MSA Aggregate Total

2011

Bank of America HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	4	29%	4	44%	0	0%	0	0%	0	0%	0	0%
Asian	133	10%	85	9%	1	2%	32	16%	14	11%	1	3%
Black or African American	125	19%	73	20%	1	3%	35	24%	15	19%	1	5%
Nat Hawaiian/other Pac Isl	3	17%	3	19%	0	0%	0	0%	0	0%	0	0%
White	567	5%	363	4%	7	1%	107	10%	69	6%	11	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	16	6%	12	6%	0	0%	2	7%	2	7%	0	0%
Race N/A	226	11%	133	9%	2	2%	52	22%	36	15%	3	3%
Total	1074	7%	673	6%	11	2%	228	13%	136	8%	16	4%

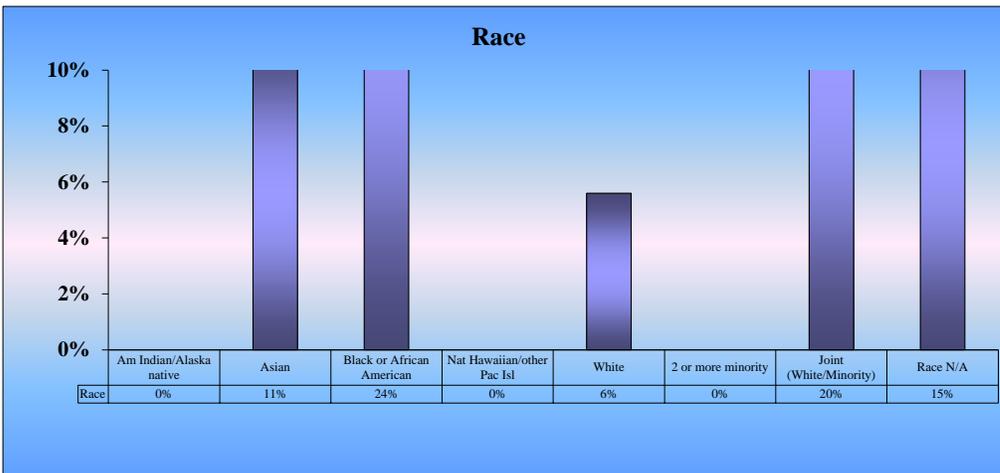
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Bank of America Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	21	11%	13	11%	0	0%	7	14%	1	10%	0	0%
Black or African American	36	24%	16	25%	0	0%	17	28%	2	13%	1	20%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	45	6%	21	4%	1	4%	13	7%	8	12%	2	8%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	20%	0	0%	0	0%	0	0%	1	50%	0	0%
Race N/A	12	15%	5	17%	0	0%	7	18%	0	0%	0	0%
Total	115	9%	55	8%	1	3%	44	13%	12	12%	3	8%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available





Bank of New York Mellon



THE BANK OF NEW YORK MELLON

Bank of New York Mellon Overview

Bank of New York Mellon
One Wall Street
New York, NY 10286

Description

Bank of New York Mellon, headquartered in New York, is a state-chartered wholesale banking institution providing asset servicing, custody services, U.S. dollar clearing, and treasury operations. The bank is one of three banking subsidiaries of The Bank of New York Mellon Financial Corporation, a global asset management and securities servicing company. As of 2011, BNY Mellon has total assets of \$236 billion, with domestic deposits of \$106 billion and net loans and leases of \$16 billion.

BNY Mellon does not extend home mortgage, small business, or consumer credit to retail customers or to the public at large. The bulk of its consumer-oriented activity involves the servicing of loans under an employee loan program that was discontinued in 2010.

BNYM’s most recent CRA evaluation examines the bank’s New York, New Jersey, and Connecticut community development activities; **the bank’s Massachusetts activities are not evaluated.**

Principal Officers

Chairman, President, & CEO

Gerald L. Hassell
One Wall Street
New York, NY 10286
212-495-1784

CFO

Thomas P. Gibbons
One Wall Street
New York, NY 10286
212-495-1784

Chief Risk Officer

Brian G. Rogan
One Wall Street
New York, NY 10286
212-495-1784

Employees

Number of Employees	32,616 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	83
Branches Within Boston MSA	2
Number of ATMs	0
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	Federal Reserve Bank of New York
Most Recent Rating	2011
Overall Rating	SATISFACTORY²

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by Federal Reserve Bank of New York published 2011.



Discussion

BNY Mellon’s performance was evaluated using the FFIEC Interagency Procedures and Guidelines for Wholesale and Limited Purpose Institutions. This examination consists of an overall community development test, and gives only a single overall CRA rating.

The bank’s CRA evaluation does not examine the bank’s Massachusetts activities. BNY Mellon’s CRA assessment area is limited to parts of New York, New Jersey, and Connecticut. As such, **ratings are provided for reference only.**

Overall Rating: SATISFACTORY³

BNY Mellon provided an adequate level of community development loans, and extensive use of qualified investments. The bank’s community development activities exhibit adequate responsiveness to the assessment area’s credit and community economic development needs, focusing on affordable housing.

Community Development Activities

BNY Mellon made a total of \$1.2 billion in community development lending and qualified investments. The bank’s community development lending was almost entirely focused on affordable housing (\$1.1 billion out of \$1.2 billion). The bank provided a total of 179 community development services during the current examination period (2009-2011), representing a significant increase from the prior examination period.⁴

The bank’s overall level of community development loans and investments, as a percentage of average assets, was below the average of its peers.⁵

Community Development Lending

Community development lending during the current evaluation period totaled \$543 million.

This represents a 24% decline from the prior evaluation period.⁶

Level and Nature of Qualified Investments

During the examination period, qualified investments totaled \$635 million, representing a significant increase from last evaluation period’s total of \$365 million. BNY Mellon’s current level of community development investments increased by 39% compared to the prior evaluation.⁷

BNYM's qualified investments were primarily targeted (99% by dollar amount) toward the development of affordable housing through investments in mortgage-backed securities and Low-Income Housing Tax Credits (LIHTCs). LIHTCs were highly responsive to this critical community development need.⁸

Community Development Services

During the examination period, BNY Mellon provided 179 community development services, twice the number of qualified services it provided during the prior evaluation period. Community development services provided by BNY Mellon were adequately responsive to community development needs. Services consisted primarily of ongoing participation on boards of local community development organizations.⁹

In 2011, the bank’s total Massachusetts philanthropic cash giving totaled \$3.2 million.¹⁰

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
BNY Mellon Center One Boston Place Boston, MA 02108		✓
BNY Mellon Center 201 Washington Street Boston, MA 02108		✓

³ Based on most recent CRA Performance Evaluation by Federal Reserve Bank of New York published 2011.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Ibid.

¹⁰ BNY Mellon Corporate Social Responsibility 2011 Highlights in Massachusetts.



FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

In 2011, BNY Mellon completed its exit from the consumer lending market and neither accepted applications nor made any HMDA loans. In 2010, BNY Mellon originated 22 HMDA-reportable loans in the Boston MSA, and no low-income loans. This was consistent with 2009 lending levels.¹¹

	2009	2010	2011
HMDA Applications Received	24	27	0
HMDA Loans Originated	17	22	0
Low-Income Applications Received	1	0	0
Low-Income Loans Originated	0	0	0

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate

Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	0.3%	0.1%	0.2%
Moderate	0.1%	0.1%	0.0%
Middle	0.0%	0.0%	0.0%
Upper	0.3%	0.1%	0.2%
Total	0.2%	0.1%	0.1%

Bank Compared to MSA Aggregate

Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	2.2%	2.1%	1.1%
Moderate	1.8%	1.4%	0.9%
Middle	0.5%	0.0%	0.0%
Upper	3.3%	1.4%	0.3%
Total	2.1%	1.2%	0.6%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for BNY Mellon in the year 2011 is also compared to the 2011

¹¹ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Reserve Bank of New York; September 12, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

BNY Mellon Corporation Annual Report 2010 and 2011.

BNY Mellon Corporate Social Responsibility Report, 2010 and 2011.

BNY Mellon website:

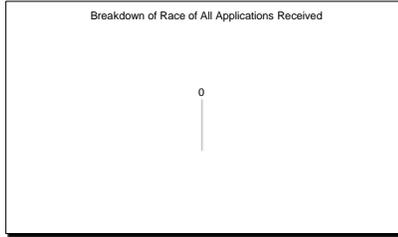
<http://www.bnymellon.com/>

Bank of NY Mellon HMDA Mortgage Information

2011

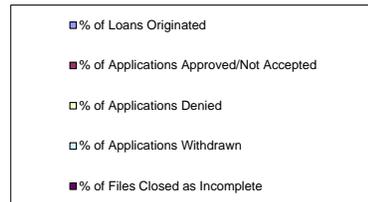
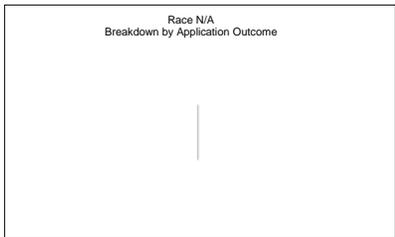
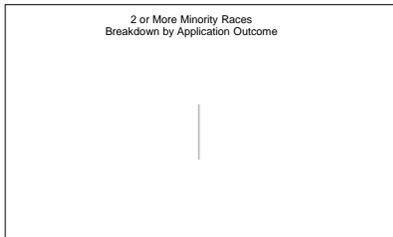
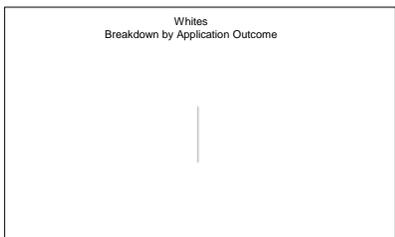
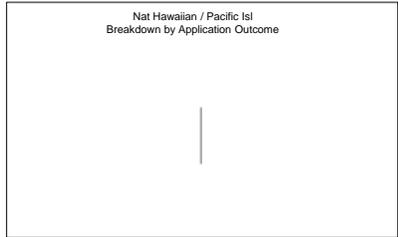
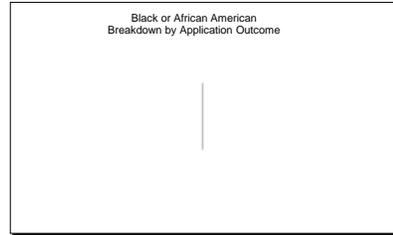
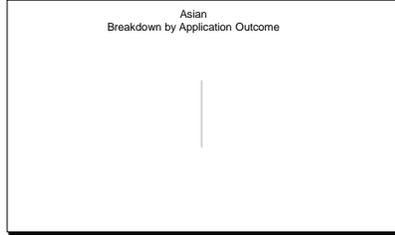
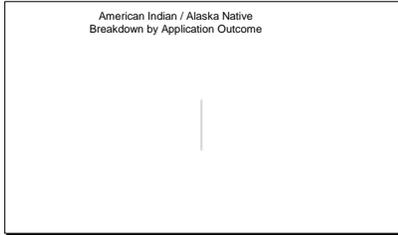
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



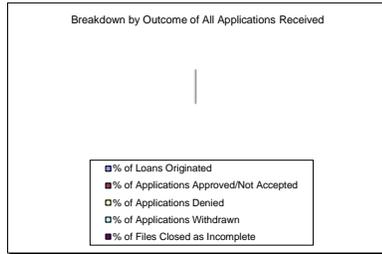
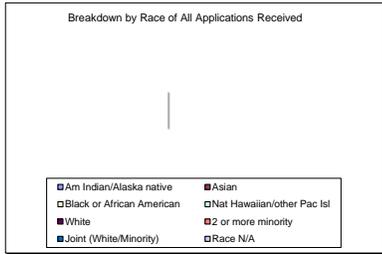
Bank of NY Mellon Low-Income Mortgage Information

Note: No Data Reported for the Boston/Quincy Region

2011

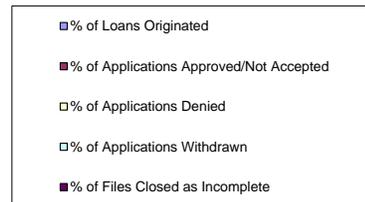
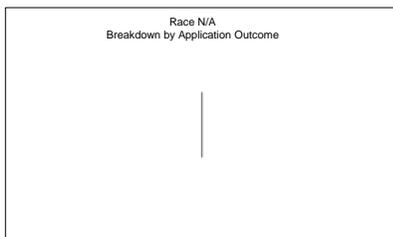
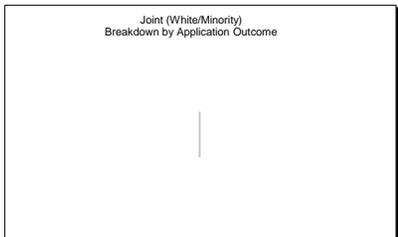
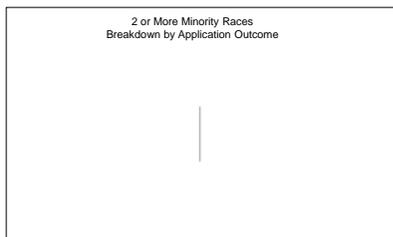
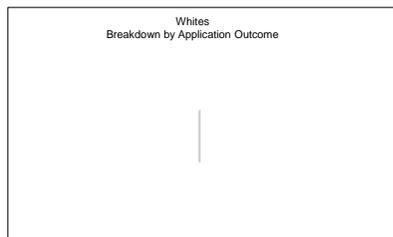
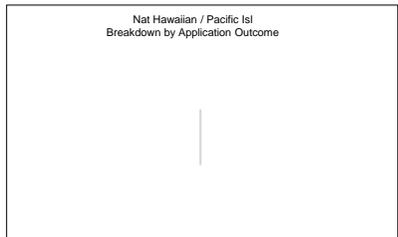
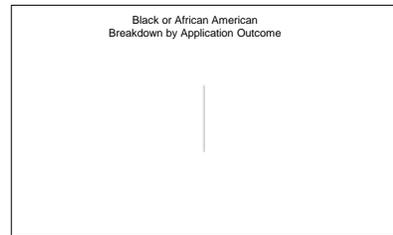
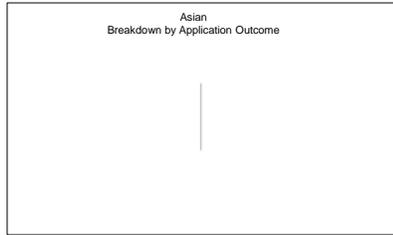
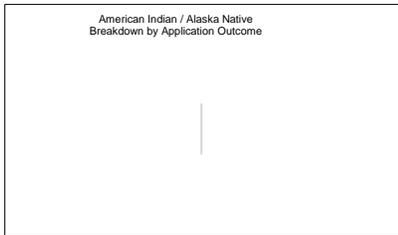
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
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White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

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Employment Information

No data available



Blue Hills Bank



Blue Hills Bank Overview

Blue Hills Bank
1196 River Street
Boston, MA 02136

Description

Blue Hills Bank (formerly Hyde Park Savings Bank) is a Massachusetts state chartered, mutual savings institution headquartered in the Hyde Park neighborhood of Boston. The bank changed its name to Blue Hills Bank in 2011. The bank was founded in 1871, and has been operating continuously from its River Street office for 140 years.

The bank's assets total \$960.6 million. The bank is almost exclusively a residential mortgage lender with 96.4% of all loans secured by one-to-four family residential properties.

In late 2010, the bank announced a new business model focused on expanding its product lines, with the goal of becoming a fully diversified community bank. In 2011, the bank created a new commercial banking division, and increased its residential lending portfolio from \$195 million to \$270 million.

Principal Officers

CEO & President

William M. Parent
1196 River Street
Boston, MA 02136
617-361-6900

CFO

Stephen McNulty
1196 River Street
Boston, MA 02136
617-361-6900

Chief Credit Officer

Thomas R Sommerfield
1196 River Street
Boston, MA 02136
617-361-6900



Employees

Number of Employees	122 ⁸⁴
Number of Employees in Massachusetts	122
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	6
Branches Within Boston MSA	3
Number of ATMs	6
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2012
Overall Rating	SATISFACTORY ⁸⁵
Lending Test Rating	SATISFACTORY
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

⁸⁴ FDIC Institution Directory

⁸⁵ Based on most recent CRA Performance Evaluation by FDIC published 2012.



Discussion

Overall rating: SATISFACTORY⁸⁶

Lending Test

**Lending Test Rating:
SATISFACTORY⁸⁷**

Blue Hills Bank’s Lending Test performance was rated an overall “Satisfactory.”

General Responsiveness to Credit Needs

Blue Hills Bank’s overall lending volume reflects adequate responsiveness to assessment-area credit needs.⁸⁸

Although the bank’s management has made a concerted effort to increase the bank’s lending volume and loan-to-deposit ratio, the bank’s lending volume still lags far behind that of comparable institutions. Blue Hills Bank’s loan-to-deposit ratio increased from 26.8% in 2009 to 40.1% in 2012; however, comparable area institutions typically maintain a loan-to-deposit ratio of 80 to 90 percent. Bank management has publicly recognized this discrepancy and has implemented strategic plans to remedy it in coming years.⁸⁹

Responsiveness to Low- and Moderate-Income Credit Needs

The distribution of Blue Hills Bank’s home mortgage lending displays an excellent responsiveness to the needs of low- and moderate-income borrowers.⁹⁰

The bank’s residential mortgages show an excellent dispersion throughout the assessment area, including low- and moderate-income geographies. Blue Hills Bank made 2.1 percent of all its home mortgage loans in low-income census tracts, exceeding the aggregate’s performance of 1.5 percent. The bank’s lending in moderate-income census tracts (12.8%)

exceeds both the percent of owner-occupied properties in moderate income geographies (12.4%) and the aggregate lending level (8.1%).

The bank is also very successful in extending home mortgage loans to borrowers of all income levels, including low- and moderate- income borrowers. The bank’s proportion of home mortgage loans to low-income borrowers (3.7%) is below the percentage of low-income families in the assessment area (8.6%), but well exceeds the aggregate performance of 2.3%. Blue Hills Bank’s home mortgage activity among moderate-income families, at 18.2%, far exceeds the 11.0% aggregate level, and is only slightly below the 19.6% proportion of moderate-income families in the assessment area.

The proportion of home mortgage loans originated by the bank to low-income borrowers increased substantially during 2011, particularly in the home purchase category. In 2011, the bank originated 13.6% of total home purchase loans to low-income borrowers, far exceeding the 8.6% proportion of low-income families in the local population.⁹¹

Leadership in Community Development Loans

Blue Hills Bank has made an adequate level of community development loans.⁹²

The bank is not heavily engaged in commercial lending, and makes few multi-family loans. Thus, its opportunities for community development lending are limited.⁹³ However, the Bank has identified two loan funds and an initiative to protect seniors as viable ways to extend credit to support community development projects. These are:

- A \$2 million investment in the Boston Community Loan Fund, which is administered by a certified Community Development Financial Institution (CDFI).
- A \$500,000 commitment to the Solomon Hess SBA Loan Fund, which promotes job creation by investing in the federally guaranteed portion of SBA 7(a) loans.

⁸⁶ Based on most recent CRA Performance Evaluation by FDIC published 2012.

⁸⁷ Based on most recent CRA Performance Evaluation by FDIC published 2012.

⁸⁸ Ibid.

⁸⁹ Ibid.

⁹⁰ Ibid.

⁹¹ Ibid.

⁹² Ibid.

⁹³ Ibid.



- Since 2008, an annually renewed \$1 million loan to the Senior Housing Crime Prevention Foundation, which seeks to provide safe and secure living environments for senior citizens.

Innovative or Flexible Lending Practices

Blue Hills Bank makes use of innovative and flexible credit programs to help meet the needs of low-and moderate-income geographies and borrowers.⁹⁴

The bank offers three innovative or flexible loan programs and one down payment and closing cost assistance program:

- The **40 Year Fixed Rate First-time Homebuyer Program** was developed by the Bank to assist first-time homebuyers. The program features a reduced fixed interest rate, no points, and reduced closing costs. The Bank originated a total of 20 loans under this program during the evaluation period: 12 in 2010, and 8 in 2012.
- The Massachusetts **Soft Second Loan Program** combines a conventional first mortgage with a subsidized second mortgage to help first time homebuyers qualify for financing. The Bank originated 16 Soft Second loans in 2011, and 8 in 2012.
- The **City of Boston Down Payment and Closing Cost Assistance Program** offers down payment and closing cost assistance for lower-income homebuyers. During the evaluation period, the Bank originated 9 mortgages to borrowers participating in this program.
- The bank offers all **Massachusetts Housing Finance Agency** programs, which support affordable homeownership and rental housing opportunities for Massachusetts residents with modest incomes. The Bank offers all MHFA programs. The Bank originated 38 loans under these programs during the evaluation period, including 6 in 2011 and 8 in 2012.

Investment Test

Investment Test Rating:
OUTSTANDING⁹⁵

Blue Hills Bank made an excellent level of qualified community development investments

⁹⁴ Ibid.

⁹⁵ Based on most recent CRA Performance Evaluation by FDIC published 2012.

and grants. Qualified investments for the evaluation period totaled \$10.6 million. Total bonds and equity securities and equity investments totaled \$10.3 million, and qualified CRA contributions totaled \$245 thousand.⁹⁶

The bank’s largest community development investments are:

- \$5.1 million in five pools of FNMA Pass-Through Certificates, government insured mortgages financing qualified residential properties in Massachusetts.
- \$2.9 million in the Community Capital Management CRA Qualified Investment Fund, an open-end fund investing in CRA sensitive debt securities supporting affordable housing and other community development needs.

Charitable Contributions

Blue Hills Bank’s qualified charitable contributions totaled \$245,000 during the review period of June 2009 through May 2012.⁹⁷

The bank established the Blue Hills Bank Charitable Foundation in November 2011, formalizing its community development efforts. At that time, the bank announced \$500,000 in multi-year pledges to area not-for-profits and the funding of its financial literacy program.⁹⁸

Boston-based organizations that received pledges from the Blue Hills Bank Charitable Foundation in 2011 include:

- Hyde Park YMCA
- West Roxbury YMCA
- Hyde Park Arts Association / Menino Arts Center Southwest Boston CDC

Service Test

Service Test Rating:
OUTSTANDING⁹⁹

⁹⁶ Ibid.

⁹⁷ Ibid.

⁹⁸ Blue Hills Bank website.

⁹⁹ Based on most recent CRA Performance Evaluation by FDIC published 2012.



Description of Service-Delivery Systems

Blue Hills Bank’s delivery systems are accessible to essentially all portions of the assessment area. The bank’s retail services, including business hours, are tailored to the convenience and needs of the assessment area, particularly low- and moderate-income geographies and individuals.¹⁰⁰

Branch hours are convenient and comparable to other institutions, and bank services are more than sufficient to meet the needs of the assessment area. All of the bank’s branches are open late on Fridays and open on Saturday.

The bank also offers online and telephone banking, and a full range of banking solutions for small businesses.

Community Development Services

Blue Hills Bank is a leader in providing community development services. These services have resulted in a better-educated community, increased awareness of community needs, and contributed to improving the communities served. The bank directs its community development services toward low- and moderate-income residents.¹⁰¹

Bank officers contribute expertise to and serve on the boards of numerous organizations with a community development purpose, including:

- Ensuring Stability Through Action in our Community (ESAC)
- Massachusetts Community and Bank Council (MCBC)
- Hyde Park YMCA
- Hyde Park Main Streets Committee
- West Roxbury Main Streets Committee
- Catholic Charities of Boston

Bank officers and employees have participated in educational seminars and other bank-sponsored events. During the examination period, Blue Hills Bank held six first-time homebuyer seminars. Topics included: getting ready for home ownership; pre-qualification; pre-approval;

advantages of home ownership; and required documentation.¹⁰²

Blue Hills Bank has fully funded a financial literacy program for elementary school students in its assessment area called “Miss Money and Her Coins.” Students are taught basic money management principles through an interactive musical.

In 2011, the bank began participating in the Interest on Lawyers’ Trust Accounts (IOLTA), which uses interest on the trust accounts to fund delivery of legal services to low-income clients. Blue Hills Bank contributed \$14,321 in interest for the period January 2011 to May 2012. Because the Bank goes above and beyond by paying an interest rate of at least 1.0 percent, it has been named a Leadership Institution by the IOLTA Committee.¹⁰³

The bank participates in the Massachusetts Community and Banking Council’s (MCBC) Basic Banking in Massachusetts program. This statewide program offers low-cost checking and savings accounts to low- and moderate-income individuals.

Blue Hills Bank collaborates with Ecumenical Social Action Committee (ESAC) of Jamaica Plain in its Sustainable Homeownership Program. The goal of the program is to prevent needless home foreclosures. Homeowners on the verge of foreclosure are counseled by ESAC and referred to participating lenders such as the Blue Hills Bank.¹⁰⁴

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1196 River Street Hyde Park, MA	✓	✓
1065 Truman Parkway Hyde Park, MA 02136	✓	✓
1920 Centre Street West Roxbury, MA 02132	✓	✓

FSB: Full Service Branch

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

¹⁰² Ibid.

¹⁰³ Ibid.

¹⁰⁴ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Blue Hills Bank’s HMDA lending declined steadily from 2006 to 2009, with a 62% drop in originations between 2008 and 2009. From 2009 to 2011, HMDA originations rose steadily year over year. After many years of little or no low-income HMDA lending, the bank originated 10 loans in 2011.¹⁰⁵

	2009	2010	2011
HMDA Applications Received	64	57	82
HMDA Loans Originated	30	38	51
Low-Income Applications Received	3	2	15
Low-Income Loans Originated	0	2	10

Small Business Loans

No 2011 HMDA-reportable small business loan data was available for Blue Hills Bank.¹⁰⁶

Loan Information By Census Tract

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

¹⁰⁵ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

¹⁰⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; May 29, 2012.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2010.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

Blue Hills Bank Annual Report 2011.

Hyde Park Bancorp Annual Report 2010.

Blue Hills Bank website:

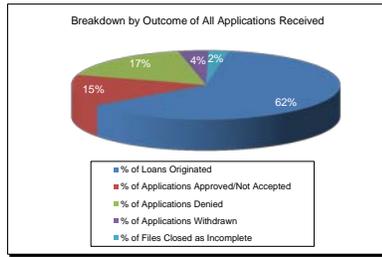
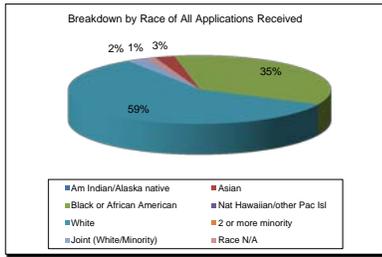
<http://www.bluehillsbank.com/>

Blue Hills Savings Bank HMDA Mortgage Information

2011

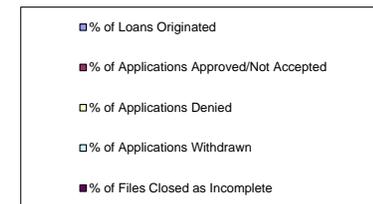
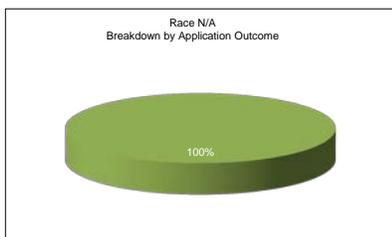
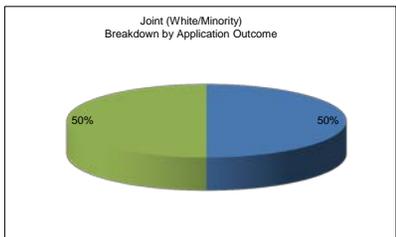
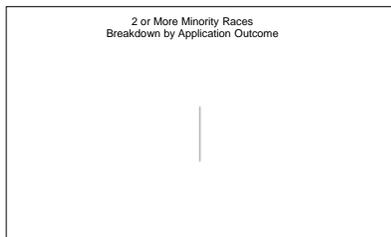
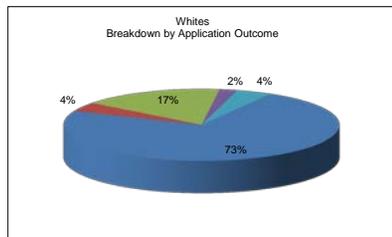
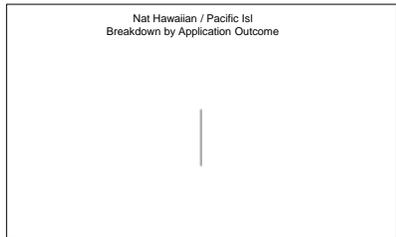
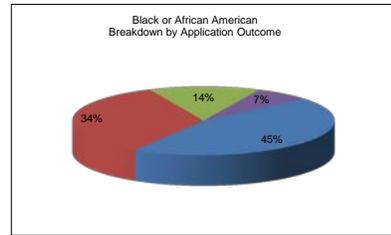
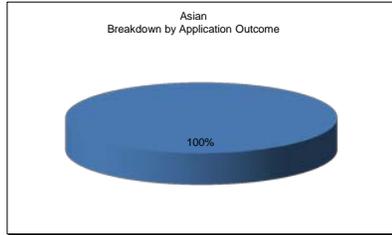
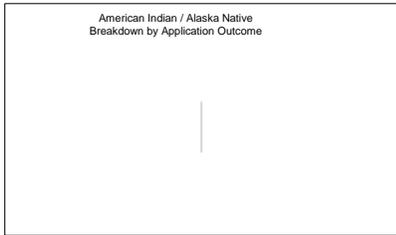
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	2%	2	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	29	35%	13	45%	10	34%	4	14%	2	7%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	48	59%	35	73%	2	4%	8	17%	1	2%	2	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	2%	1	50%	0	0%	1	50%	0	0%	0	0%
Race N/A	1	1%	0	0%	0	0%	1	100%	0	0%	0	0%
Total	82	100%	51	62%	12	15%	14	17%	3	4%	2	2%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



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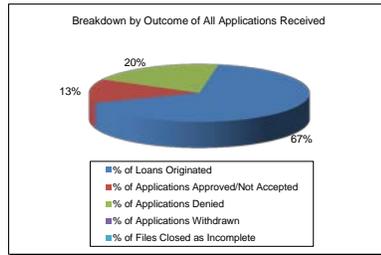
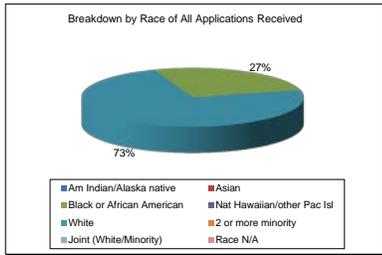


Blue Hills Bank Low-Income Mortgage Information

2011

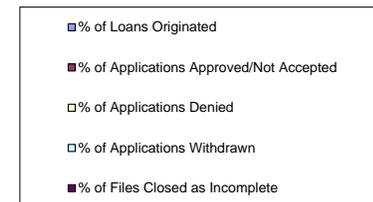
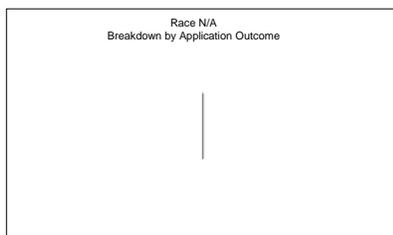
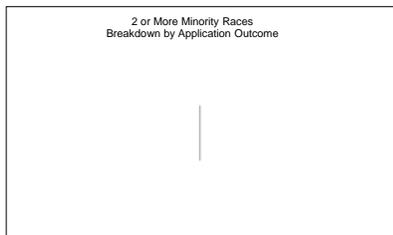
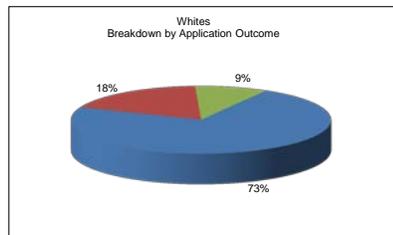
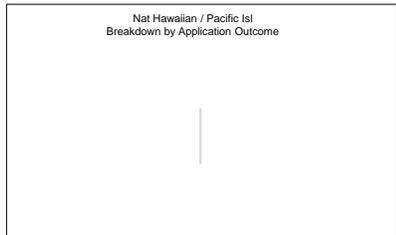
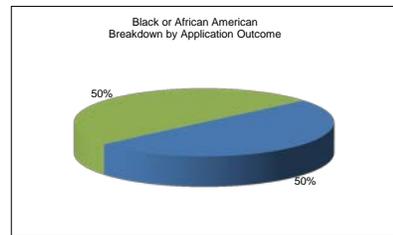
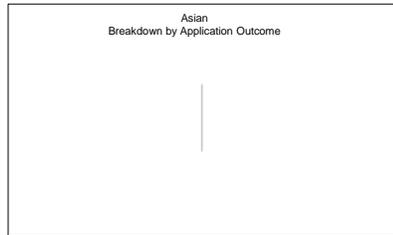
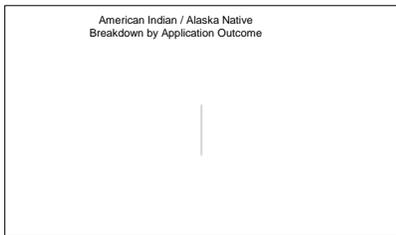
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	4	27%	2	50%	0	0%	2	50%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	11	73%	8	73%	2	18%	1	9%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	15	100%	10	67%	2	13%	3	20%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



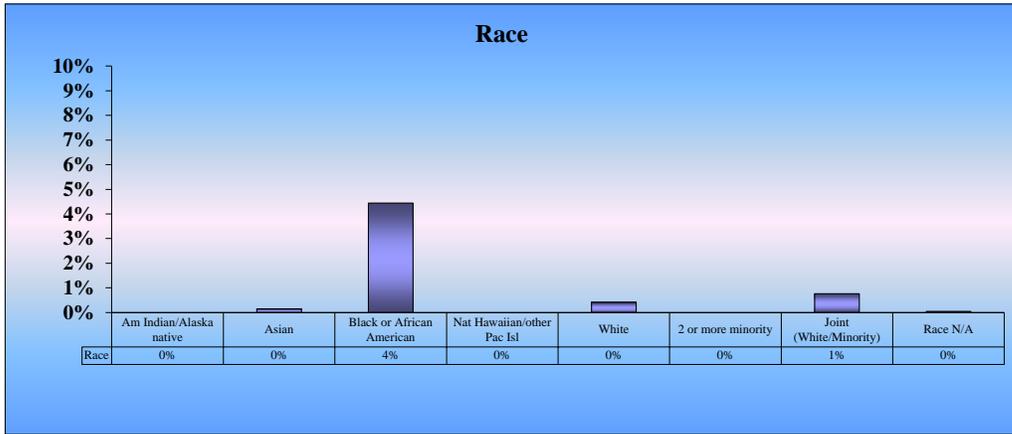
Compared against the MSA Aggregate Total

2011

Blue Hills Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	29	4%	13	4%	10	26%	4	3%	2	3%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	48	0%	35	0%	2	0%	8	1%	1	0%	2	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	1	1%	0	0%	1	4%	0	0%	0	0%
Race N/A	1	0%	0	0%	0	0%	1	0%	0	0%	0	0%
Total	82	1%	51	0%	12	2%	14	1%	3	0%	2	1%

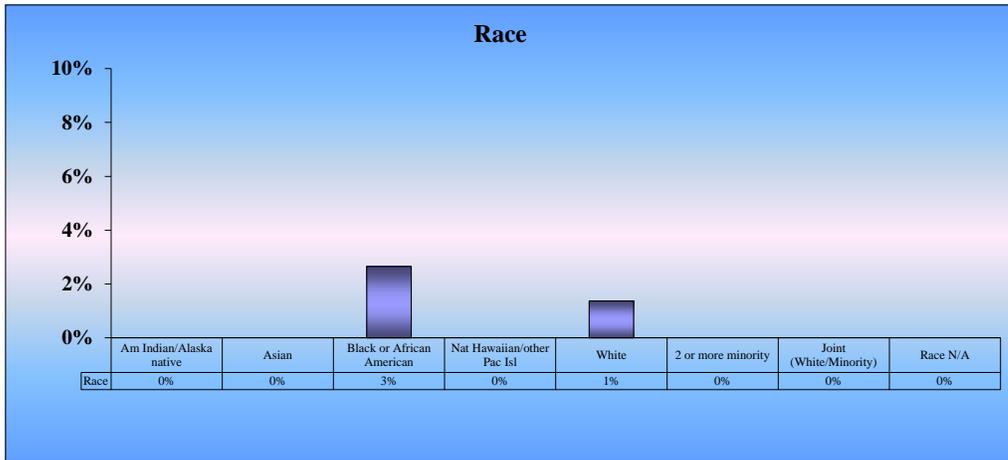
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Blue Hills Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
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Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	4	3%	2	3%	0	0%	2	3%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	11	1%	8	2%	2	8%	1	1%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	15	1%	10	1%	2	5%	3	1%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available



Boston Private Bank



**BOSTON PRIVATE BANK
& TRUST COMPANY**

Boston Private Bank Overview

Boston Private Bank & Trust Company
10 Post Office Square
Boston, MA 02109

Description

Boston Private Bank & Trust Company is a \$5.85 billion stock-owned commercial bank headquartered in Boston. The bank is a subsidiary of Boston Private Financial Holdings.

In May 2011, Boston Private’s three affiliate banks (in Washington state, northern California, and southern California) were fully integrated into Boston Private Bank under a unified bank charter.

Boston Private Bank & Trust Company specializes in providing banking, investment, and fiduciary products to high-net-worth individuals, families, and businesses.

Although established as a wealth management company, the bank has developed a strong community banking orientation by offering retail deposit and loan products that appeal to a wide customer base, including those of low- and moderate-income. It has also demonstrated a positive commitment to the communities in which it operates through its community development lending, investments, and services.

Nearly half (39%) of the bank’s total loans and leases are residential mortgage loans. The bank has announced its strategic decision to increase the proportion of residential mortgage loans in its lending portfolio relative to its commercial real estate loans, which currently make up 51% of the bank’s loan portfolio.

Principal Officers

CEO & President

Mark D. Thompson
10 Post Office Square
Boston, MA 02109
617-912-1900

CFO

Anne L. Randall
10 Post Office Square
Boston, MA 02109
617-912-1900

Chief Risk Officer

W. Timothy MacDonald
10 Post Office Square
Boston, MA 02109
617-912-1900

Employees

Number of Employees	657 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	24
Branches in Boston	5
Number of ATMs in Boston	5
Number of Free-Standing ATMs in Boston	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2011
Overall Rating	OUTSTANDING ²
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹ FDIC Institution Directory

² Based on most recent CRA Performance Evaluation by FDIC published 2011.





Discussion

Overall rating: OUTSTANDING³

Large bank CRA examination procedures were utilized for Boston Private Bank's evaluation. The assigned rating is based on the results of three performance tests: the Lending Test, the Investment Test, and the Service Test.

Lending Test

Lending Test Rating: OUTSTANDING⁴

General Responsiveness to Credit Needs

Boston Private Bank's lending activity reflects an excellent responsiveness to the assessment area's credit needs. The bank actively originates home mortgage and small business loans, and is a leader in the origination of community development loans in its assessment area.⁵

Responsiveness to Low- and Moderate-Income Credit Needs

Boston Private Bank has achieved an excellent lending penetration among retail customers of different income levels and businesses of different sizes. The bank's residential lending data reflects excellent penetration among borrowers of different income levels in Boston, particularly low- and moderate-income borrowers. This demonstrates the bank's commitment to, and success in, extending credit to borrowers of all income levels, especially those of low and moderate income.⁶

The bank's volume of lending to low-income borrowers, especially in the home purchase category, was excellent compared to aggregate lending data. The percentage of lending to moderate-income borrowers exceeded the percentage of moderate-income families in the assessment area. The bank had a very strong penetration in the home purchase category to these borrowers.⁷

Though Boston-area HMDA-reportable lending decreased between 2009 and 2011, the bank's performance was still considered strong considering the extent of the economic deterioration that has occurred during this time period.⁸

Boston Private Bank's geographic distribution of home mortgage and small business loans reflects excellent dispersion throughout the assessment area's low-, moderate-, middle-, and upper-income census tracts.

The bank was particularly successful in extending Home Purchase Loans in low-income geographies. In 2009, Boston Private extended 10.2 percent of its home purchase loans in low-income census tracts, which is excellent compared to demographics (1.8 percent), and aggregate lending performance (3.7 percent). Similarly, the bank made 25.6 percent of its home purchase loans in moderate-income census tracts, which compares favorably against the demographics (16.0 percent), and the aggregate lending data (21.4 percent). The Bank continued its strong performance into 2010.⁹

Leadership in Community-Development Loans

Boston Private Bank continues to demonstrate a leadership role in community development lending. The community development loans originated throughout the evaluation period have had a significant impact on the communities in which the loans were made. Several loans created affordable housing for low- and moderate-income individuals and in low- and moderate-income geographies.

During the evaluation period of 2009-2011, the bank originated 93 community development loans, totaling \$229.4 million. This was a dramatic increase from the previous evaluation (2006-2008), when the bank originated 43 community development loans totaling \$86.4 million. Given the needs of the assessment area and the weakened economy, the bank's

³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁴ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Based on most recent CRA Performance Evaluation by FDIC published 2011; and FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System, 2011.

⁹ Based on most recent CRA Performance Evaluation by FDIC published 2011.



community development lending performance is considered excellent.¹⁰

The following are examples of significant community development projects funded by the bank:

- \$10 million loan to a charter school in Lynn serving students from low-income families.
- \$10 million loan for construction and bridge financing for a 75-unit rental housing development for low- and moderate-income people.
- Over \$50 million in a tax exempt bond for the rehabilitation and construction of affordable public housing developments in Cambridge.
- \$14.5 million in new construction financing for the purpose of economic development/revitalization of a retail plaza, which created 300 permanent jobs during a severe recession.

The bank originated six additional community development purpose loans totaling approximately \$2.9 million inside the assessment area. The loans provided funds for community development organizations and for affordable housing.¹¹

Innovative & Flexible Lending Practices

Boston Private Bank makes extensive use of innovative and flexible lending programs in order to serve its assessment-area credit needs. Several loan programs it offers are specifically tailored to assist low- and moderate-income individuals in attaining homeownership by offering below-market interest rates, reduced costs, and flexible underwriting guidelines.¹²

Several factors contribute to the bank’s success in originating loans to borrowers of low- and moderate-income. First, the bank is effectively using Soft Second mortgage loan programs to assist applicants in obtaining homeownership. Boston Private Bank has consistently been the

number-one Soft Second mortgage lender in Boston, and is among the top five lenders in Massachusetts overall.

Second, the bank originates loans utilizing MassHousing loan programs. MassHousing offers a number of different loan programs tailored for low- and moderate-income borrowers which feature low interest rates and flexible underwriting standards. The bank participates in the MassHousing Mortgage Program, Home Saver Program, and My Community Mortgage Program. The bank originated 431 MassHousing program loans totaling over \$83 million during the CRA evaluation period.

Third, the bank made extensive use of equity builder funds from the Federal Home Loan Bank of Boston (FHLBB) to assist low- and moderate-income borrowers in purchasing a home. Equity builder funds provide borrowers with downpayment and closing cost assistance to help consumers who might not otherwise qualify for financing to obtain a home.

Fourth, the bank maintains relationships with important community development organizations that develop affordable housing and provide services to first-time homebuyers. These positive working relationships have proven effective in reaching low- and moderate- income homebuyers.

Boston Private Bank works with the City of Boston Department of Neighborhood Development on its Foreclosure Prevention Initiative, and on its 3D Program, which helps finance homebuyers who meet certain income guidelines.¹³

Boston Private Bank was designated in 2006 as a “*First Choice Lender*” by Mayor Thomas Menino. The bank provides mortgage financing using flexible underwriting criteria and works with Boston’s Home Center and nonprofit homeowner counseling agencies to help victims of predatory lending. The bank has originated few loans under this program due to current

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Based on most recent CRA Performance Evaluation by FDIC published 2011; Boston Private Bank website.



market conditions and the limited number of qualified applicants.¹⁴

Investment Test

Investment Test Rating:
OUTSTANDING¹⁵

Boston Private Bank has an excellent level of qualified community development investments. The bank's qualified investments demonstrate an excellent responsiveness to the assessment area's economic development needs. In addition, the bank makes significant use of innovative or complex investments to support community development initiatives.

During the examination period, the bank demonstrated an excellent level of investments in affordable housing programs, economic development programs, and organizations that meet a range of community development needs, particularly for low- or moderate-income residents.¹⁶

Community Development Investments & Grants

Boston Private Bank's new qualified investments totaled approximately \$230 million for the examination period 2009-2011. This total includes new equity investments in affordable housing, small businesses, and community development grants. Retained investments from prior commitments totaled almost \$22 million.¹⁷

During the exam period, the bank invested \$1 million in Massachusetts Housing Equity Fund XVIII of the Massachusetts Housing Investment Corporation, which works to finance affordable housing in low- or moderate-income communities in Massachusetts. Boston Private Bank has specified that investments be limited to partnerships whose investments will be targeted to the Boston Metropolitan area. The bank's prior investments in five MHEF funds total \$4.15 million.

During the examination period, Boston Private Bank made \$227 million in Ginnie Mae Bond purchases. This investment provides capital to the national housing market to finance affordable housing for low- and moderate-income households.¹⁸

The bank also purchased over \$800,000 of Massachusetts Historic Rehabilitation Tax Credits to support the Jamaica Plain Neighborhood Development Corporation and the Neighborhood Of Affordable Housing, a residence for formerly homeless men in East Boston.

Boston Private Bank has provided grants to various organizations that provide community services as defined by the regulation or have instituted programs targeting low- or moderate-income persons or geographies. Such qualifying services include community-based childcare, healthcare, education, and social services. During the review period, Boston Private Bank provided \$1.2 million in qualified grants and donations to numerous organizations.¹⁹

Service Test

Service Test Rating: **OUTSTANDING**²⁰

Description of Service-Delivery Systems

Boston Private Bank's delivery systems are accessible to essentially all portions of the assessment area. The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and hours of operations are tailored to meet the needs of the assessment area.²¹

The bank's low-cost checking and saving account, as well as the convenience of its automated telephone banking service, customer service center, and website, are tailored to the convenience and needs of its assessment area.

¹⁴ Ibid.

¹⁵ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Based on most recent CRA Performance Evaluation by FDIC published 2011.

²¹ Ibid.



Community Development Services

Boston Private Bank is considered a leader in community development services. Officers and employees of the bank of have provided a high level of service activity in response to community needs. Retail banking services and products offer consumers flexibility and convenience. In addition, officers and employees of the bank provide an excellent level of involvement in community organizations located throughout its assessment area.

Approximately 38 officers and employees of the bank are involved in nearly 95 local community development and non-profit organizations in various capacities. Bank personnel serve as directors, officers, treasurers, committee members, and volunteers, and provide many services such as fundraising, public relations, finance, and administrative support. In many cases, employee involvement in these organizations has led to loans and grants.²²

Boston Private Bank partners with non-profit organizations and public agencies involved in low- and moderate-income communities to provide financial literacy education. Subjects typically covered in the training include basic banking, budgeting, and credit issues.

From 2008 to the first quarter of 2011, 20 employees taught 45 financial literacy classes to elementary, middle, and high school students in the Boston public schools and to various community organizations. The community organizations involved in the training offer after-school or leadership programs for low- and moderate-income students.

The bank’s loan officers regularly collaborate with non-profit agencies in providing first-time homebuyer counseling classes. Classes are available in English and Spanish and translations into Chinese are also offered. Between 2008 and the first quarter 2011, loan officers from the bank taught 109 seminars to over 3,000 people, and partnered with 26 organizations.²³

The bank is a corporate sponsor for two Main Streets programs, the Hyde-Jackson Main Street

Program and the Dudley Square Main Street Program. These programs are economic development initiatives by merchants and local residents working cooperatively with the City of Boston. In addition to grant support, bank staff serve on boards and committees for the groups, volunteer at fund raising and community events, and host small business networking and training events.

Boston Private Bank also supports the work of the Earned Income Tax Credit Coalition of the City of Boston. It conducts a Social Investing Series as a means to increase its involvement in the community, and it administers a Community Partner Outreach program as a means to obtain a more in-depth understanding of the community development and credit needs of the local area.²⁴

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
10 Post Office Square Boston, MA 02109	✓	✓
500 Boylston Street Boston, MA 02116	✓	✓
Jamaica Plain Loan Center 401c Centre Street Jamaica Plain, MA 02130	✓	✓
157 Seaport Boulevard Boston, MA 02210	✓	✓
800 Boylston Street Boston, MA 02199	✓	✓
FSB: Full Service Branch		

²² Ibid.

²³ Ibid.

²⁴ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Boston Private Bank's HMDA lending declined in 2010 and in 2011, both in applications received and in loans originated. Between 2009 and 2011, HMDA loans originated fell by 20%.

The bank's low-income HMDA lending also decreased in 2010 and 2011, though the bank consistently originates a high percentage of all low-income applications received.²⁵

	2009	2010	2011
HMDA Applications Received	378	356	304
HMDA Loans Originated	317	278	252
Low-Income Applications Received	46	45	27
Low-Income Loans Originated	37	35	26

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	2.0%	1.0%	1.7%

Moderate	0.4%	0.4%	0.3%
Middle	0.6%	0.6%	0.6%
Upper	3.1%	2.2%	2.6%
Total	1.4%	1.0%	1.2%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	8.6%	6.3%	10.0%
Moderate	4.8%	3.6%	4.3%
Middle	6.0%	4.9%	5.0%
Upper	15.3%	14.7%	16.3%
Total	9.1%	7.5%	9.3%

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Boston Private Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

²⁵ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; August 15, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

2010 Linked Deposit Banking Report to the Mayor of the City of Boston, BankIQ; March 2012.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

Boston Private Financial Holdings Annual Report 2010.

Boston Private Bank & Trust Company Annual Report 2011.

Boston Private Bank website:

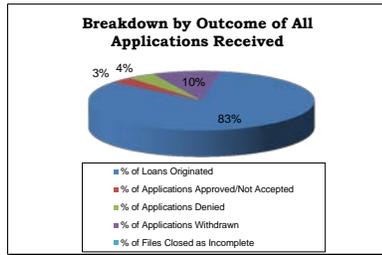
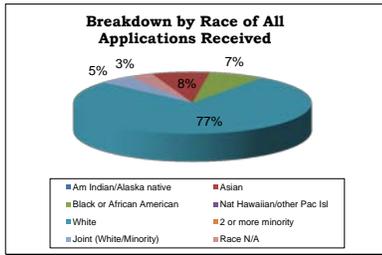
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Boston Private Bank HMDA Mortgage Lending

2011

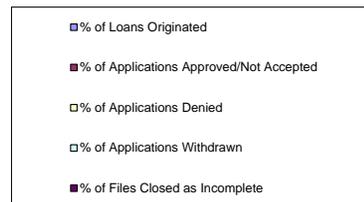
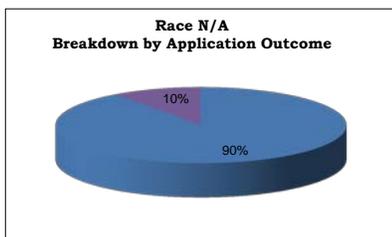
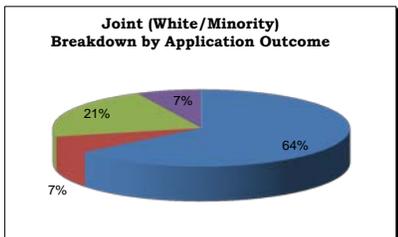
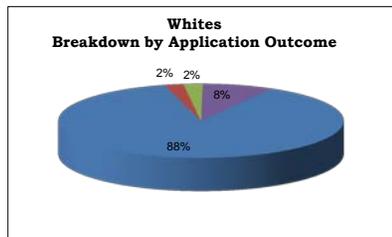
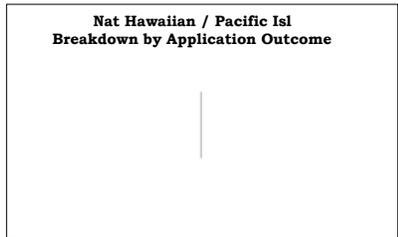
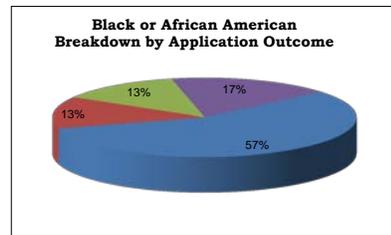
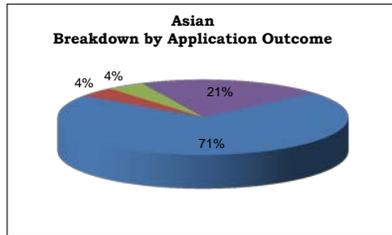
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Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	24	8%	17	71%	1	4%	1	4%	5	21%	0	0%
Black or African American	23	8%	13	57%	3	13%	3	13%	4	17%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	233	77%	204	88%	5	2%	5	2%	19	8%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	14	5%	9	64%	1	7%	3	21%	1	7%	0	0%
Race N/A	10	3%	9	90%	0	0%	0	0%	1	10%	0	0%
Total	304	100%	252	83%	10	3%	12	4%	30	10%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



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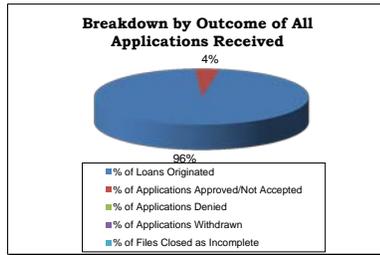
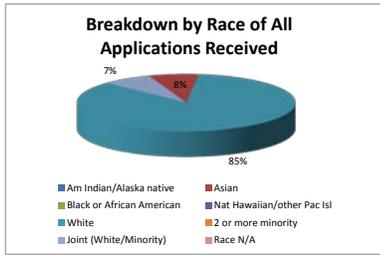


Boston Private Bank Low-Income Mortgage Lending

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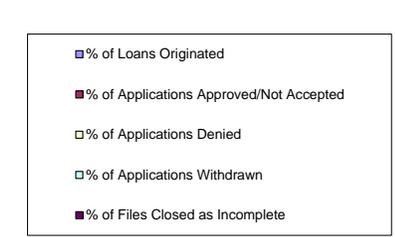
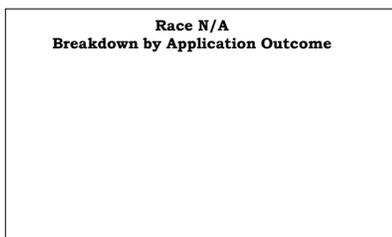
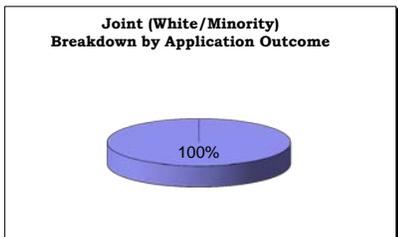
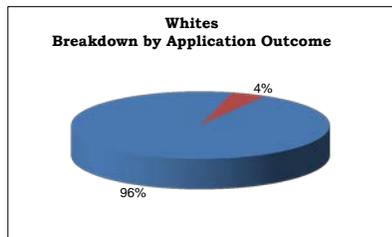
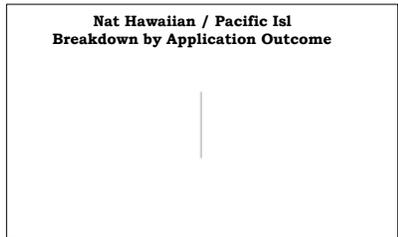
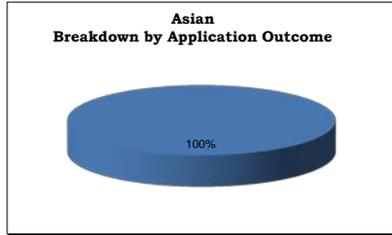
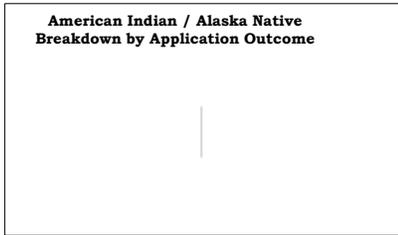
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	7%	2	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	23	85%	22	96%	1	4%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	7%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	27	100%	26	96%	1	4%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



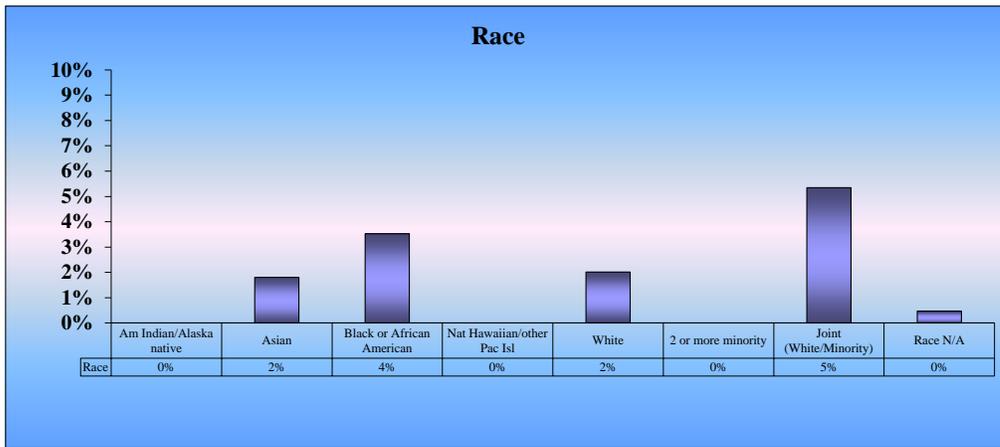
Compared against the MSA Aggregate Total

2011

Boston Private Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	24	2%	17	2%	1	2%	1	0%	5	4%	0	0%
Black or African American	23	4%	13	4%	3	8%	3	2%	4	5%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	233	2%	204	2%	5	1%	5	0%	19	2%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	14	5%	9	5%	1	7%	3	11%	1	4%	0	0%
Race N/A	10	0%	9	1%	0	0%	0	0%	1	0%	0	0%
Total	304	2%	252	2%	10	1%	12	1%	30	2%	0	0%

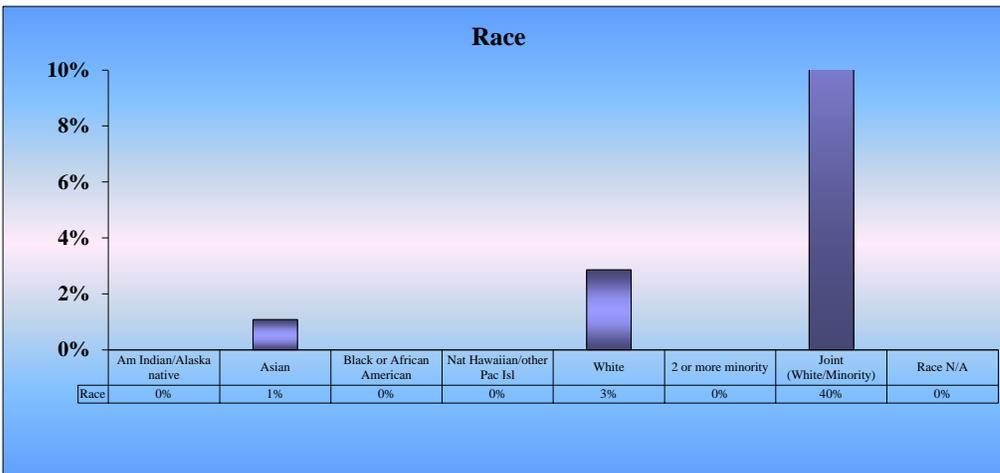
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Boston Private Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	1%	2	2%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	23	3%	22	4%	1	4%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	40%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	27	2%	26	4%	1	3%	0	0%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Cathay Bank



CATHAY BANK

Cathay Bank Overview

Cathay Bank
777 North Broadway Street
Los Angeles, California 90012

Description

Cathay Bank is a \$10.6 billion commercial bank headquartered in Los Angeles, California. It is wholly owned by Cathay General Bancorp (Nasdaq: CATY), a one-bank holding company.

Cathay Bank primarily operates in California markets with a concentration of Chinese-American individuals and businesses; however, the bank operates a total of 49 branch offices in seven states, including one branch in Massachusetts. The bank also operates one branch in Hong Kong, and offices in Taipei and Shanghai.

Cathay Bank is primarily a commercial lender. The majority of its loans are commercial mortgage loans, commercial loans, and real estate construction loans. 1 to 4 family residential loans make up only 18.4% of the bank's loan portfolio.

Cathay Bank entered the Boston market in 2003, at the completion of its merger with General Bank. The bank's Massachusetts activities account for only a minor portion of the bank's overall lending, investments, and services; as of 2010, Massachusetts represents only 2.7% of Cathay Bank's loans and 0.8% of deposits.

Principal Officers

Chairman, President, & CEO

Dunson K. Cheng
777 North Broadway Street
Los Angeles, California 90012
213-625-4700

CFO

Heng W. Chen
777 North Broadway Street
Los Angeles, California 90012
213-625-4700

Chief Credit Officer

Kim R. Bingham
777 North Broadway Street
Los Angeles, California 90012
213-625-4700

Employees

Number of Employees	1018 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	50
Branches Within Boston PSMA	1
Number of ATMs in Boston	1
Number of Free-Standing ATMs	0

CRA Rating for Massachusetts

Rating Agency	FDIC
Most Recent Rating	2010
Overall Rating in Massachusetts	SATISFACTORY ²
Lending Test Rating in Massachusetts	High Satisfactory
Investment Test Rating in Massachusetts	Low Satisfactory
Service Test Rating in Massachusetts	High Satisfactory

¹ FDIC Institution Directory

² Based on most recent CRA Performance Evaluation by FDIC published 2010.



Discussion

**Overall rating for Massachusetts:
SATISFACTORY³**

Cathay Bank received both an overall rating for its nationwide activities, and a rating for its Massachusetts activities. The bank’s national ratings were similar to its Massachusetts ratings. It received an overall rating of Satisfactory; High Satisfactory on the Lending Test; and Low Satisfactory on the Investment Test and the Service Test.

The CRA evaluation of Cathay Bank’s Massachusetts activities state rating was based exclusively on the bank’s Boston MSA activities.

Lending Test

**Lending Test Rating for Massachusetts:
HIGH SATISFACTORY⁴**

General Responsiveness to Credit Needs

Cathay Bank’s lending levels reflect an overall good responsiveness to Boston MSA credit needs. The bank consistently originates a low number of home mortgage loans in the Boston MSA. Boston HMDA lending represents a very small proportion of the bank’s lending.⁵ In 2011, approximately 65% of the bank’s residential mortgages were for properties located in California.⁶

**Responsiveness to Low- and Moderate-
Income Credit Needs**

The bank exhibits an overall good record of serving the credit needs of the most economically disadvantaged areas in Boston, including low-income geographies, low-income individuals, and very small businesses.

Cathay Bank’s distribution of 1 to 4 family property loans reflects adequate penetration

among borrowers of different income levels in Boston. The bank’s lending to low-income borrowers consistently exceeds the aggregate, though it is less than the percentage of low-income families in the Boston assessment area.

The bank also exceeds the aggregate performance in originating loans in low-income census tracts. In 2009, for example, the bank originated 14.3 percent of its 1 to 4 family property loans in low-income census tracts, and 28.6 percent in moderate-income census tracts. This exceeds both the aggregate (3.7 percent and 23.9 percent, respectively), and the percentages of owner-occupied housing units (2.3 percent and 22.0 percent, respectively).⁷

Community Development Lending

Cathay Bank has made an adequate level of community development loans in Boston. During the review period 2008-2010, Cathay Bank extended five community development loans in Boston totaling \$10.2 million. This represents approximately 2.0 percent by dollar volume of all of the bank’s community development loans funded during this review period.⁸

Innovative and/or Flexible Lending Practices

Cathay Bank makes little use of flexible lending practices in order to serve Boston-area credit needs. None of its programs are considered innovative, though some do contain flexible lending terms to assist borrowers who would otherwise not qualify for traditional banking products.⁹

The bank continues to offer its Community Homebuyers Loan Program, which targets first-time homebuyers who earn less than 120 percent of median family income, or who are purchasing a residential property in a qualified low- or moderate-income census tract. During the period 2007-2010, however, the bank did not originate any loans under this program.¹⁰

Cathay Bank’s subsidiary community development corporations are tasked with development of low-income neighborhoods in

³ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁴ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁵ Ibid.

⁶ Cathay General Bancorp Annual Report 2011.

⁷ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.



California, New York, and Chicago; community development in Boston is not part of their stated mission.¹¹

Investment Test

Investment Test Rating for Massachusetts: **LOW SATISFACTORY**¹²

Cathay Bank has an adequate level of qualified community development investments and grants in Boston. The level and types of qualified investments held by the bank exhibit an adequate responsiveness to credit and community economic development needs within the Boston assessment area. In addition, the bank occasionally uses complex investments to support community development initiatives, including affordable housing.

During the review period 2008-2010, the bank invested \$1.1 million in the Massachusetts Housing Equity Fund to be used for low-income housing tax credits in Boston. Tax credits help provide much-needed affordable housing in Boston. The bank also maintains a \$3.3 million investment in MMA Fund 28 in Boston.

Cathay Bank also made ten grants totaling \$74,500 (3.2 percent of total grants and donations) to various community organizations that serve community development purposes in Boston.

Service Test

Service Test Rating for Massachusetts: **HIGH SATISFACTORY**¹³

Cathay Bank’s delivery systems are reasonably accessible to essentially all portions of the Boston assessment area. The bank has provided an adequate level of qualified community development services in Boston.¹⁴

The bank’s sole Massachusetts branch is located in a low-income census tract. This branch is full service, has an ATM, and the hours generally reflect the needs of the local communities served. This branch offers extended weekend banking hours on Saturday.

Community Development Services

Given the bank’s limited presence in the State of Massachusetts, Cathay Bank provided a high level of qualified community development services in Boston. A significant majority of the bank’s community development services focus on economic development and on providing community services to low- and moderate-income individuals.¹⁵

During the review period Cathay Bank provided 266 community development service hours (9.5 percent of all the bank’s service hours) in Boston. The bank’s community development services in Boston included:

- Preparing tax returns for low-income residents
- Advising a non-profit agency that provides occupational services to economically disadvantaged residents
- Serving as a member of a fundraising committee for a non-profit that provides assistance to low-income residents of Boston’s Chinatown

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
621 Washington Street Boston, MA 02111 <small>FSB: Full Service Branch</small>	✓	✓

¹¹ Cathay General Bancorp Annual Report 2011.

¹² Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹³ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹⁴ Ibid.

¹⁵ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Cathay Bank’s HMDA lending levels have remained consistently low over the past decade. The bank did not made any low-income loans in Boston during the period 2001-2007. It made only one each in 2008 and 2009, none in 2010, and two in 2011.¹⁶

	2009	2010	2011
HMDA Applications Received	8	9	10
HMDA Loans Originated	6	7	6
Low-Income Applications Received	1	1	3
Low-Income Loans Originated	1	0	2

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	0.2%	0.4%	0.2%
Moderate	0.0%	0.1%	0.0%
Middle	0.0%	0.0%	0.0%
Upper	0.0%	0.0%	0.0%
Total	0.1%	0.1%	0.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	0.7%	1.4%	0.5%
Moderate	0.4%	1.2%	0.0%
Middle	0.0%	0.0%	0.0%

Upper	0.0%	0.0%	0.2%
Total	0.3%	0.6%	0.2%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Cathay Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; June 28, 2010.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor of the City of Boston, BankIQ; March 2012.

Cathay General Bancorp Annual Reports, 2010 and 2011.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

Cathay Bank website:

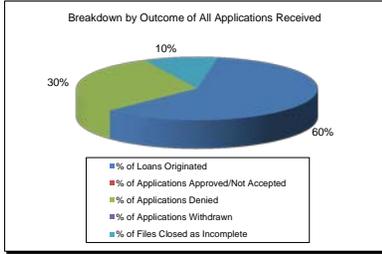
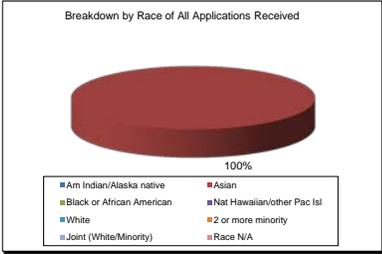
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Cathay General Bancorp HMDA Mortgage Information

2011

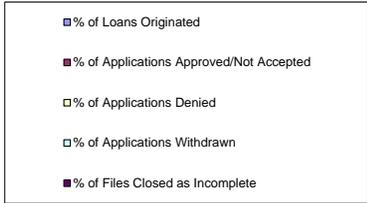
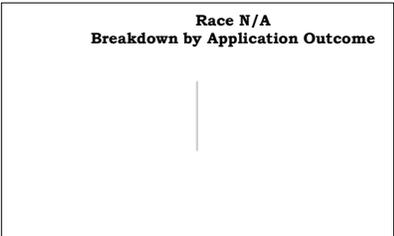
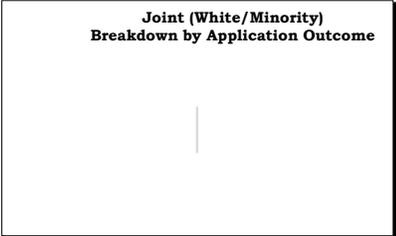
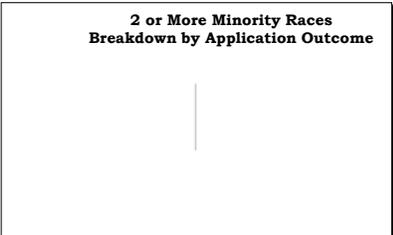
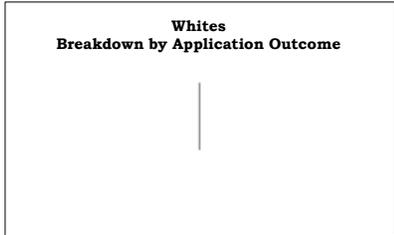
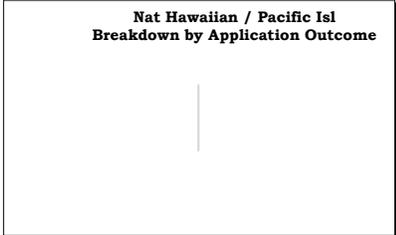
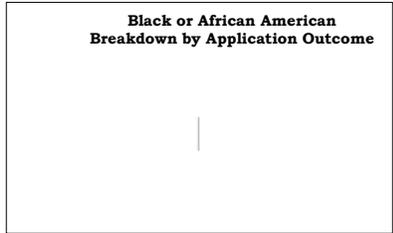
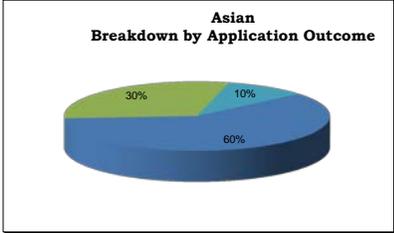
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	10	100%	6	60%	0	0%	3	30%	0	0%	1	10%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	10	100%	6	60%	0	0%	3	30%	0	0%	1	10%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

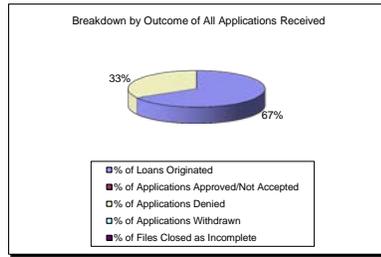
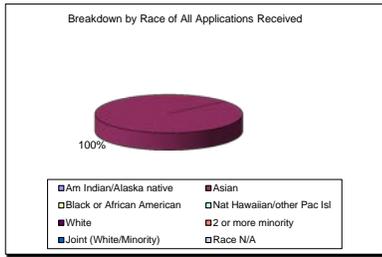


Cathay General Bancorp Low-Income Mortgage Information

2011

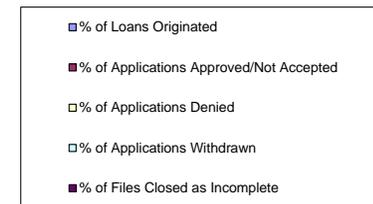
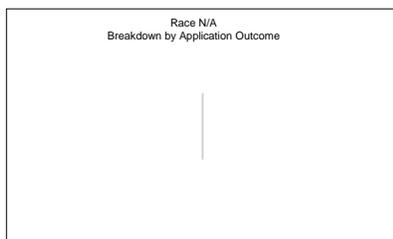
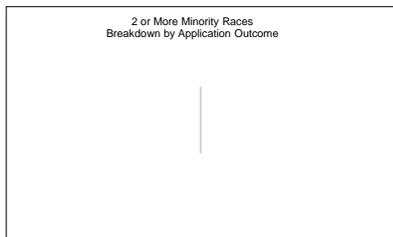
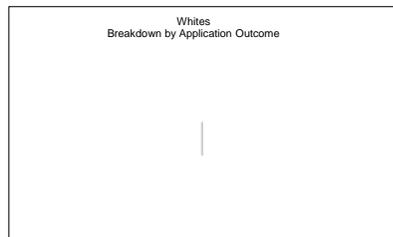
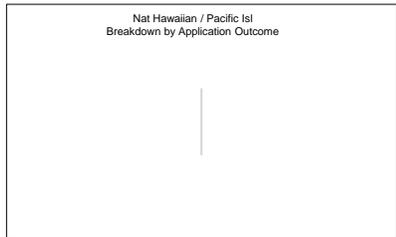
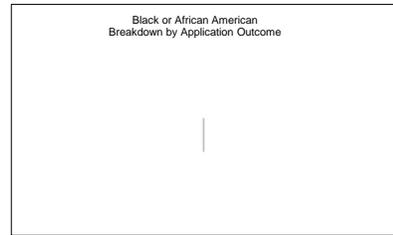
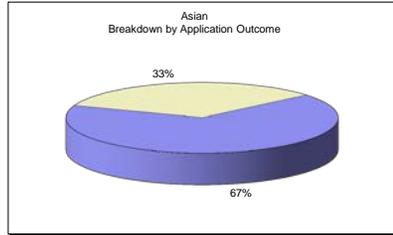
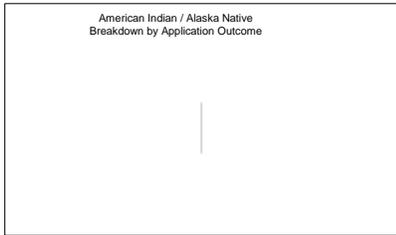
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Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	3	100%	2	67%	0	0%	1	33%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	3	100%	2	67%	0	0%	1	33%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



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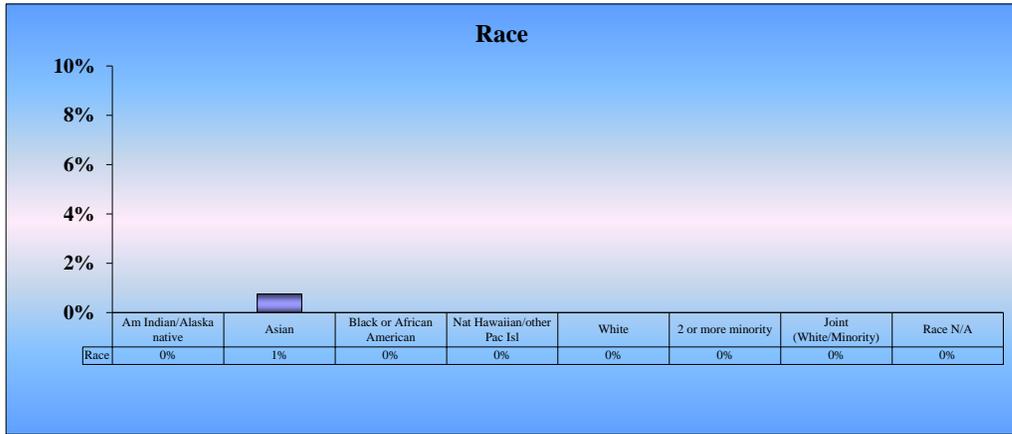
Compared against the MSA Aggregate Total

2011

Cathay General Bancorp HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
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Asian	10	1%	6	1%	0	0%	3	1%	0	0%	1	3%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	10	0%	6	0%	0	0%	3	0%	0	0%	1	0%

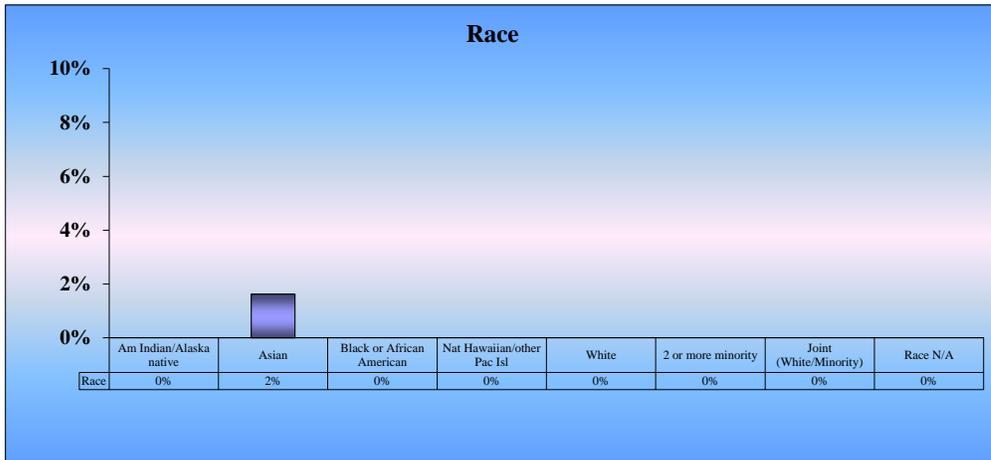
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Cathay General Bancorp Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	3	2%	2	2%	0	0%	1	2%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	3	0%	2	0%	0	0%	1	0%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available



Century Bank & Trust



Century Bank
Banking for the New Century

Century Bank Overview

Century Bank & Trust
102 Fellsway West
Somerville, MA 02145

Description

Century Bank is a \$2.74 billion commercial bank headquartered in Somerville, Massachusetts. Century Bank operates 24 branches in 17 Massachusetts cities and towns. It is a wholly-owned subsidiary of Century Bancorp, Inc (NASDAQ: CNBKA).

Century Bank’s 1-4 family residential lending portfolio has grown significantly since 2008. The greatest share of the bank’s lending is in 1-4 family residential loans (\$350 million, or 36%), with a substantial proportion secured by commercial real estate (23%).

Principal Officers

CEO and President

Barry R. Sloane
102 Fellsway West
Somerville, MA 02145
866-823-6887

CFO

William P. Hornby
102 Fellsway West
Somerville, MA 02145
866-823-6887

Compliance Officer

Nancy Lindstrom
102 Fellsway West
Somerville, MA 02145
866-823-6887

Employees

Number of Employees	361 ¹
Number of Employees in Massachusetts	361
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	24
Branches in Boston	5
Number of ATMs in Boston	6
Number of Free-Standing ATMs in Boston	1

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2011
Overall Rating	SATISFACTORY²
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

¹ FDIC Institution Directory

² Based on most recent CRA Performance Evaluation by FDIC published 2011.



Discussion

Overall rating: SATISFACTORY³

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁴

General Responsiveness to Credit Needs

Century Bank’s lending activity reflects good responsiveness to credit needs in its assessment area, taking into account the number and dollar amount of home mortgage and small business loans. Between 2008 and mid-2011, the bank’s 1 to 4 family residential loan portfolio increased 35.2 percent.⁵

Responsiveness to Low- and Moderate-Income Credit Needs

Century Bank’s overall distribution of loans reflects excellent penetration among individuals of different income levels and among businesses of different sizes.

Century Bank regularly surpasses the aggregate percentage of loans originated to low- and moderate-income borrowers. In 2010, the bank extended 8.6 percent of mortgage loans to low-income borrowers and 23.2 percent to moderate-income borrowers. The percentage of loans to low-income borrowers not only exceeds the aggregate, but also exceeds the percentage of low-income residents in the assessment area. Given the economic environment within the assessment area, this performance is considered very good.⁶

The Bank’s geographic distribution of home mortgage and small business loans also reflects a good dispersion throughout the assessment area in 2009 and 2010, particularly to low- and moderate-income geographies.⁷

Leadership in Community-Development Loans

Century Bank made a relatively high level of community development loans since the last CRA evaluation. In the period 2009-2011, Century Bank originated 15 qualified community development loans, totaling \$34 million. This represented a significant increase since the last evaluation period, during which the Bank originated 13 loans totaling \$20 million. Given the economic environment, this performance is considered good.⁸

In addition, Century Bank originated loans that had a broader community development purpose. These loans provided tangible benefits to the community and surrounding areas. Two such loans, totaling \$11 million, were made to the Special Olympics to construct a new headquarters and athletic facility. Century Bank also funded an \$11 million loan to Franciscan Hospital for Children to refinance existing debt and expand the facility to house more children.

In 2010, Century Bank approved a \$4.5 million tax exempt bond, \$1.5 million loan, and a \$2.5 million revolving line of credit to a non-profit agency located in Lynn. The agency provides meals, home care, and transportation to low- and moderate-income seniors and persons with disabilities. The Bank also made a \$35,000 commercial real estate loan to a not-for-profit corporation for the acquisition and redevelopment of two properties in Medford into affordable housing.⁹

In 2011, the Bank originated a \$198,000 loan in Roxbury. The loan was used to purchase a property which will be leased to a non-profit child and family service agency. The bank also approved a \$615,000 loan and a \$1.5 million line of credit to an organization located in the Boston area, which serves emotionally disturbed and homeless children.

Innovative or Flexible Lending Practices

Century Bank makes limited use of innovative or flexible lending practices to serve assessment area credit needs.

³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁴ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁹ Ibid.



Century Bank is an active member in the City of Malden’s Redevelopment Authority Housing programs, which allows the bank to offer first-time homebuyers an adjustable-rate loan at below-market rates.

The bank also partners with two companies through which the Bank offers mortgage insurance. This enables the Bank to insure a certain percentage of a home mortgage loan, allowing homebuyers that do not have a sufficient downpayment to obtain a mortgage. Throughout the evaluation period, the Bank originated 24 loans with mortgage insurance, totaling approximately \$8.3 million.

Investment Test

Investment Test Rating: LOW SATISFACTORY¹⁰

Century Bank had an adequate level of qualified community development investments; however, the bank is rarely in a leadership position and makes few investments that are not routinely provided by private investors. The institution exhibits an adequate responsiveness to credit and community economic development needs through its qualified grants and donations; however, the bank rarely uses innovative or complex investments to support community development initiatives.¹¹

Century Bank has made two new community development investments since the last CRA examination in 2007. In 2009 and 2010, the bank purchased two Federal National Mortgage Association Mortgage-Backed Securities. These CRA-targeted securities are tailored to meet the community development needs of a financial institution. The securities purchased were both backed by residential mortgages originated to low- or moderate-income borrowers in the bank’s assessment area.¹²

The Bank provided a good level of charitable contributions. During the evaluation period, donations totaled \$987,043. The Bank granted

\$222,475 in donations in 2009, and \$326,736 in 2010.

Service Test

Service Test Rating: HIGH SATISFACTORY¹³

Century Bank’s retail banking services are essentially accessible to all portions of the assessment area, including low- and moderate-income areas and to individuals of different income levels and businesses of different sizes. Services, including branch hours, are convenient and comparable to other institutions and do not vary in a way that inconveniences certain parts of the assessment area.¹⁴

Description of Service-Delivery Systems

Century Bank’s service delivery systems are accessible to essentially all portions of the assessment area. The bank operates 24 branch locations, all with ATMs, as well as stand-alone ATMs in four additional locations. The bank also offers a good variety of accounts for retail and business consumers.

Bank associates speak over 18 second languages and are available to assist customers. This reflects favorably on workplace diversity and customer service support.

Community Development Services

Century Bank provides a relatively high level of community development services, displaying a good responsiveness to the needs of low- and moderate-income individuals in the assessment area. The bank’s services have resulted in a better-educated community and an increased awareness of community needs. The bank offers services to low- and moderate-income residents, and provides technical assistance to organizations with a community development purpose.¹⁵

The Bank encourages employees to be active members of their communities. Bank staff taught

¹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹¹ Ibid.

¹² Ibid.

¹³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁴ Ibid.

¹⁵ Based on most recent CRA Performance Evaluation by FDIC published 2011.



The Money Smart program, an adult education program developed by the FDIC to provide outreach and teach financial literacy to adults outside of the financial mainstream. Bank staff also taught various homebuyer and small business seminars.

The bank also participated in financial seminars on homeownership in conjunction with Housing Families, Inc., the largest operator of affordable housing for homeless and very low-income families in Massachusetts.

In addition, Century Bank’s staff lends their technical expertise, experience, and judgment by actively participating in local organizations.¹⁶

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
512 Commonwealth Ave. Boston, MA 02215	✓	✓
275 Hanover Street Boston, MA 02113	✓	✓
24 Federal Street Boston, MA 02110	✓	✓
136 State Street Boston, MA 02110	✓	✓
300 Western Avenue Allston, MA 02134	✓	✓
500 Commonwealth Ave. Boston, MA 02215	✓	

FSB: Full Service Branch

¹⁶ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Century Bank’s HMDA lending showed a marked increase in 2011. After declining in 2009 and 2010, the bank’s HMDA originations more than doubled in 2011. Low-income applications and originations remain nominal.¹⁷

	2009	2010	2011
HMDA Applications Received	25	23	34
HMDA Loans Originated	15	10	25
Low-Income Applications Received	1	2	4
Low-Income Loans Originated	1	1	1

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	0.3%	0.5%	0.2%
Moderate	0.6%	1.1%	0.3%
Middle	0.7%	1.0%	0.4%
Upper	0.4%	0.9%	0.5%
Total	0.5%	0.9%	0.4%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	1.0%	2.0%	0.3%
Moderate	1.7%	4.0%	1.5%
Middle	2.9%	3.3%	3.5%
Upper	1.2%	3.1%	1.4%
Total	1.6%	3.1%	1.7%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Century Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the

¹⁷ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation, June 6, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

Century Bank Annual Report, 2010 and 2011.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

Century Bank website:

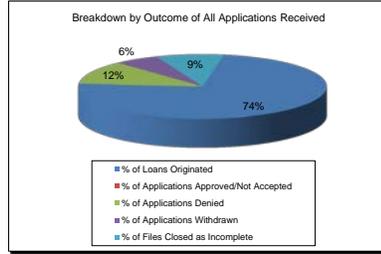
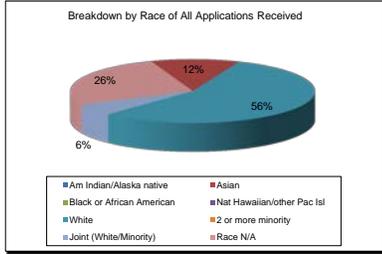
<http://www.centurybank.com/>

Century Bank HMDA Mortgage Information

2011

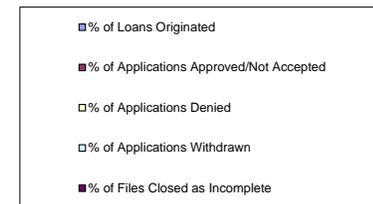
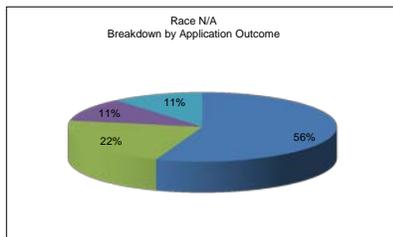
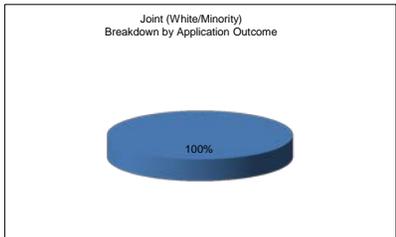
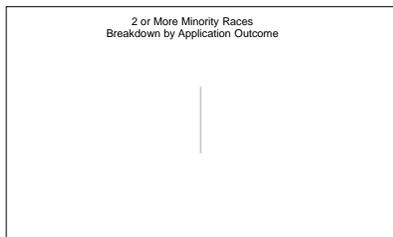
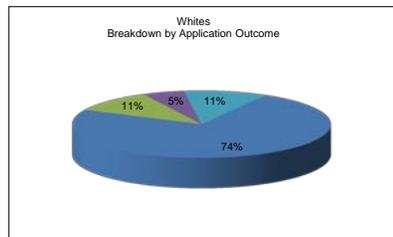
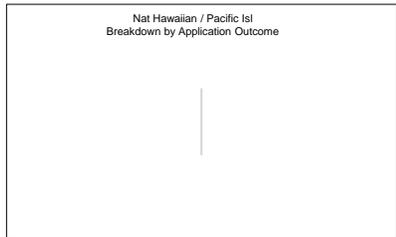
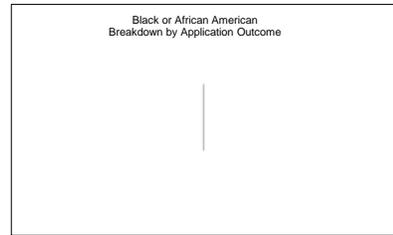
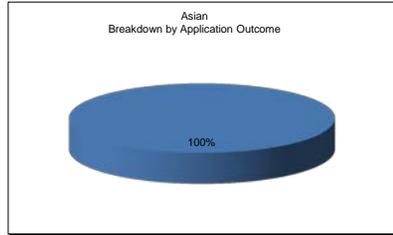
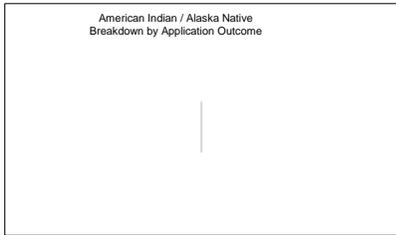
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	4	12%	4	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	19	56%	14	74%	0	0%	2	11%	1	5%	2	11%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	6%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	9	26%	5	56%	0	0%	2	22%	1	11%	1	11%
Total	34	100%	25	74%	0	0%	4	12%	2	6%	3	9%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

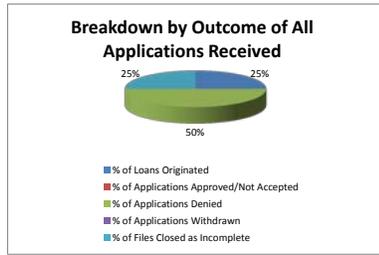
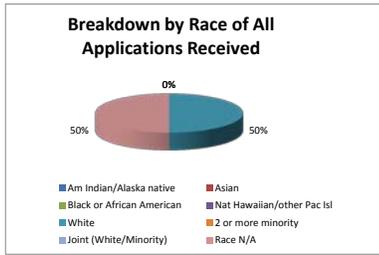


Century Bank Low-Income Mortgage Information

2011

Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	50%	0	0%	0	0%	1	50%	0	0%	1	50%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	50%	1	50%	0	0%	1	50%	0	0%	0	0%
Total	4	100%	1	25%	0	0%	2	50%	0	0%	1	25%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

American Indian / Alaska Native
Breakdown by Application Outcome

Asian
Breakdown by Application Outcome

Black or African American
Breakdown by Application Outcome

Nat Hawaiian / Pacific Isl
Breakdown by Application Outcome

Whites
Breakdown by Application Outcome

2 or More Minority Races
Breakdown by Application Outcome

Joint (White/Minority)
Breakdown by Application Outcome

Race N/A
Breakdown by Application Outcome

- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

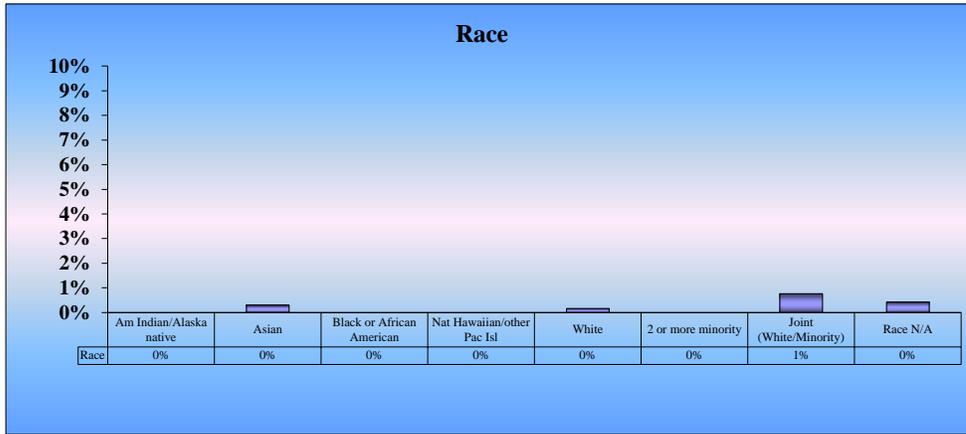
Compared against the MSA Aggregate Total

2011

Century Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	4	0%	4	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	19	0%	14	0%	0	0%	2	0%	1	0%	2	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	2	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	9	0%	5	0%	0	0%	2	1%	1	0%	1	1%
Total	34	0%	25	0%	0	0%	4	0%	2	0%	3	1%

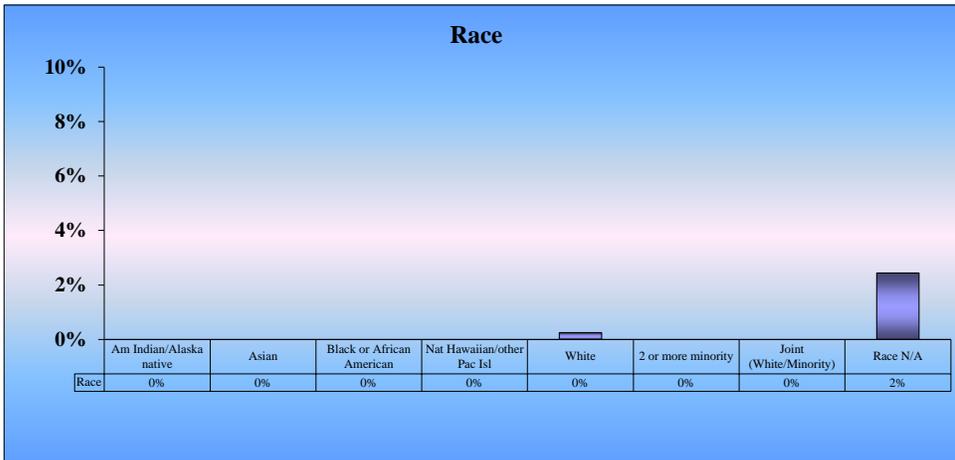
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Century Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	0%	0	0%	0	0%	1	1%	0	0%	1	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	2%	1	3%	0	0%	1	3%	0	0%	0	0%
Total	4	0%	1	0%	0	0%	2	1%	0	0%	1	3%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information



RBS Citizens Bank



401-456-7096

President, Citizens Bank of Massachusetts

Girard R. Sargent
28 State Street
Boston, Massachusetts 02109
800-852-5577

RBS Citizens Bank Overview

RBS Citizens, N.A.
One Citizens Plaza
Providence, RI 02903

Description

RBS Citizens Bank is a \$106 billion commercial bank headquartered in Providence, RI. It is owned by the Royal Bank of Scotland Group plc.

RBS Citizens is the 12th largest bank in the nation by assets, and the 9th largest by branches. The bank has 1500 branches, 3900 ATMs, and 19,700 employees in 12 states.

In Massachusetts, RBS Citizens Bank has a primary market focus on providing credit, deposit accounts, and services to individuals and small businesses. The bank has 258 branch offices and 765 ATMs in Massachusetts.

In 2004, Citizens acquired Charter One Financial, Inc., the holding company for Charter One Bank (total assets: \$41 billion), the largest acquisition in the bank's history. In 2007, the bank increased its integration with RBS, its parent company. At the end of the year, it consolidated all its existing bank charters into a single national charter called RBS Citizens, N.A.

No CRA information is reported about RBS Citizens' Massachusetts activities. The most recent CRA review did not include the bank's Massachusetts presence. Ratings are provided for reference only.

Principal Officers

CEO, Citizens Financial Group

Ellen Alemany
One Citizens Plaza
Providence, RI 02903
401-456-7096

CFO, Citizens Financial Group

John Fawcett
One Citizens Plaza
Providence, RI 02903

Employees

Number of Employees	15,982 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches in Massachusetts	258
Branches in Boston MSA	32
Number of ATMs in Massachusetts	765
Free-Standing ATMs in Massachusetts	507

CRA Rating

Rating Agency	OCC
Most Recent Rating	2007
Overall Rating	OUTSTANDING²
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation published by OCC published 2007.



Discussion

Overall rating: OUTSTANDING³

The integrated RBS Citizens received a CRA evaluation in December 2007. **The evaluation did not include any Boston information** because the evaluation was conducted immediately following the integration of Citizens Bank of Massachusetts with the national RBS Citizens Bank. **Ratings are included below as a reference only.**

Lending Test

Lending Test Rating: OUTSTANDING⁴

General Responsiveness to Credit Needs

The bank's performance under the Lending Test is rated Outstanding. Full-scope reviews display an excellent volume of HMDA and small business lending and an excellent responsiveness to the credit needs of the assessment areas.

Responsiveness to Low- and Moderate-Income Credit Needs

The bank's distribution of loans among borrowers of different income levels was excellent. Borrower distribution among different income levels for home purchase lending was excellent.

The geographic distribution of RBS Citizens Bank's home mortgage loans and small loans to businesses reflects good distribution of loans among geographies of different income levels.

The bank displayed an excellent volume of community development lending that was responsive to the credit needs of the assessment areas and had a positive impact on lending test performance.

RBS Citizens Bank offers excellent loan product flexibility, which has a positive impact on lending test performance. The bank offers several proprietary loan programs targeted to

low- and moderate-income borrowers, which showed excellent product flexibility.

In 2009, RBS Citizens Bank was among the top twenty retail mortgage originators in the United States among prime customers.⁵ In early 2011, the bank launched its "Citizens for Homes" program, highlighting the bank's commitment to home lending and leadership position in its retail markets.⁶

RBS Citizens has historically been among the top SBA lenders in Massachusetts. It was the number-one SBA lender in 2006 and 2007, and the number-two SBA lender in 2009 and 2010.⁷

Investment Test

Investment Test Rating: OUTSTANDING⁸

The bank's performance under the Investment test is rated Outstanding. The bank has an excellent level of investments that reflects excellent responsiveness to the credit and community development needs of the assessment areas.

Community Development Investments and Grants

In 2011, RBS Citizens Bank invested \$16 million in charitable grants and sponsorships. The bank's donations supported more than 1200 nonprofit organizations, and were focused on economic development, including financial literacy; human services; and affordable housing.⁹

In 2010, the bank offered a variety of financial support to individuals and businesses affected by flooding in Massachusetts, Rhode Island, and Connecticut.¹⁰

³ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁴ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁵ Citizens Bank Annual Report 2009.

⁶ Citizens Bank Annual Report 2010.

⁷ Small Business Association website.

⁸ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁹ Citizens Bank Annual Report 2009.

¹⁰ Citizens Bank website.



Service Test

Service Test Rating: OUTSTANDING¹¹

Description of Service-Delivery Systems

RBS Citizens Bank’s service delivery systems were readily accessible to geographies and individuals of different income levels in the assessment areas.¹²

The bank offers a variety of alternative delivery systems, which include full service ATMs and telephone banking including loan-by-phone services. Online banking services included deposit applications, retail loan applications, home equity and mortgage loan applications, small business and commercial loan applications and bill payment services. RBS Citizens also offers an affordable checking account product that would be attractive to low- and moderate-income people.¹³

Community Development Services

RBS Citizens Bank supports a wide variety of financial literacy programs. The bank participates in the FDIC’s Money Smart Training Program, which helps individuals outside the financial mainstream enhance their money skills and create positive banking relationships.¹⁴

The Bank has a number of programs to recognize and support employees who volunteer in the community.¹⁵

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1100 Massachusetts Avenue Dorchester, MA 02125-1606	✓	✓
1355 Washington Street Boston, MA 02118	✓	✓
1377 Hyde Park Avenue Hyde Park, MA 02136	✓	✓
1573 Blue Hill Avenue Mattapan, MA 02126	✓	✓
1628 Tremont Street Boston, MA 02120	✓	✓
1999 Centre Street West Roxbury, MA 02132	✓	✓
2000 Beacon Street Brighton, MA 02135	✓	✓
2343 Washington Street Roxbury, MA 02119	✓	✓
26 Central Square East Boston, MA 02128	✓	✓
28 State Street Boston, MA 02109	✓	✓
315 Hanover Street Boston, MA 02113	✓	✓
35 Washington Street Brighton, MA 02146	✓	✓
40 Summer Street Boston, MA 02110	✓	✓
414 Washington Street Brighton, MA 02135	✓	✓
426 Boylston Street Boston, MA 02116	✓	✓
435 Brookline Avenue Boston, MA 02215	✓	✓
441 West Broadway South Boston, MA 02127	✓	✓
5 Austin Street Charlestown, MA 02129	✓	✓
53 State Street Boston, MA 02109	✓	✓
560 Commonwealth Avenue Boston, MA 02215	✓	✓
569-571 Washington Street Dorchester, MA 02124	✓	✓
6 Ave De Lafayette Boston, MA 02111	✓	✓
60 Everett Street Allston, MA 02134	✓	✓
60 Newmarket Square Boston, MA 02118	✓	✓
607 Boylston Street Boston, MA 02116	✓	✓
696 Centre Street Jamaica Plain, MA 02130	✓	✓

¹¹Based on most recent CRA Performance Evaluation by OCC published 2007.

¹² Ibid.

¹³ Ibid.

¹⁴ Citizens Bank website.

¹⁵ Ibid.



73 Tremont Street Boston, MA 02108	✓	✓
77 Franklin Street (lobby) Boston, MA 02110-1519	✓	✓
771 Commonwealth Avenue Boston, MA 02215	✓	✓
777 South Street Roslindale, MA 02131	✓	✓
950 American Legion Highway Roslindale, MA 02131	✓	✓
One Financial Center Boston, MA 02111	✓	✓

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

RBS Citizens' HMDA lending has been consistent year over year for 2009 through 2011. The bank's ratio of originations to applications has remained consistent, with roughly 64-66% of HMDA applications resulting in an origination.

The bank's low-income lending has also remained stable over the same time period.¹⁶

	2009	2010	2011
HMDA Applications Received	819	832	849
HMDA Loans Originated	524	530	545
Low-Income Applications Received	126	132	97
Low-Income Loans Originated	64	72	63

¹⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	9.6%	6.1%	5.2%
Moderate	7.3%	5.7%	5.0%
Middle	6.7%	5.0%	4.3%
Upper	6.4%	4.4%	4.3%
Total	7.4%	5.3%	4.7%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	22.2%	8.2%	8.8%
Moderate	16.2%	8.9%	9.7%
Middle	21.8%	6.9%	5.5%
Upper	17.5%	8.2%	9.4%
Total	19.4%	8.0%	8.4%

business loan activity for RBS Citizens Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; December 31, 2007.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Information Directory:

<http://www2.fdic.gov/idasp/main.asp>

Citizens Financial Group Annual Report 2009, 2010, and 2011.

Citizens Bank website:

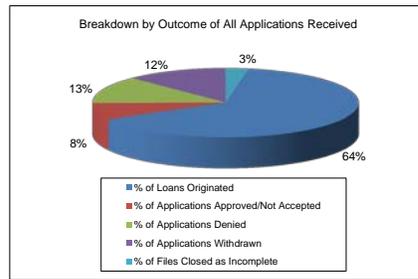
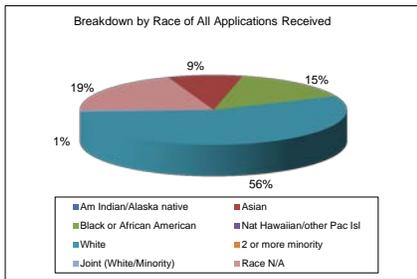
<http://www.citizensbank.com/>

RBSCitizens Bank HMDA Mortgage Information

2011

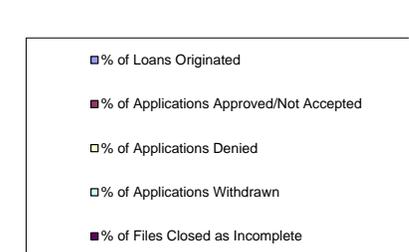
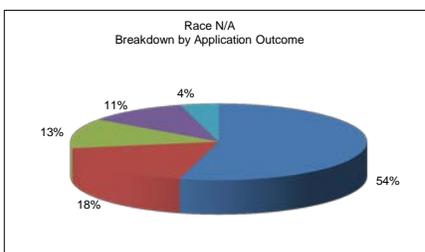
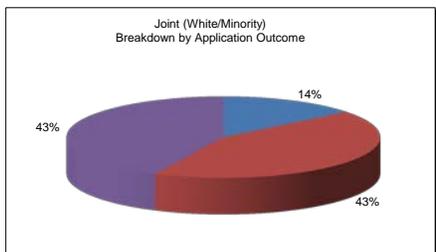
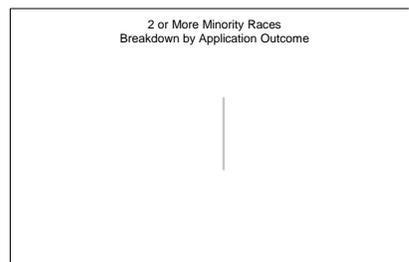
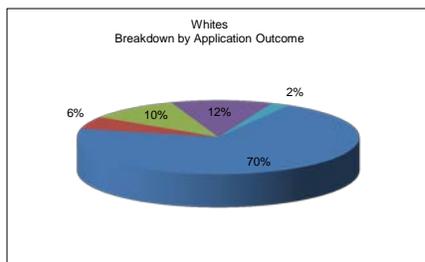
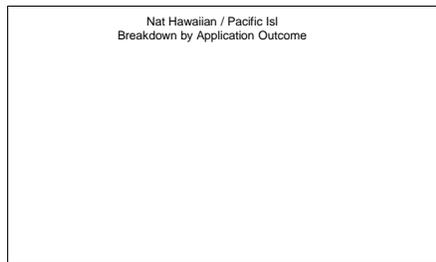
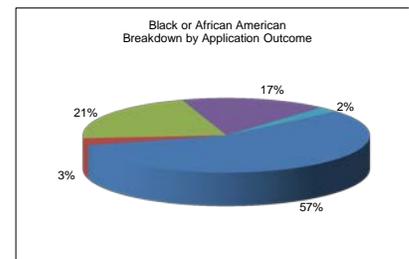
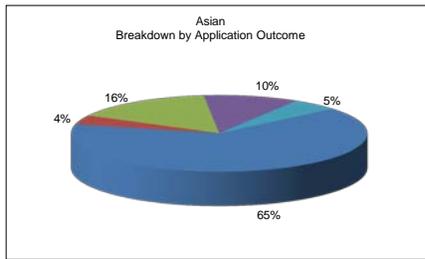
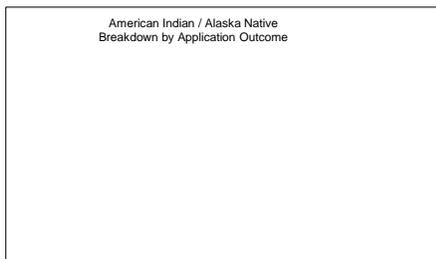
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	77	9%	50	65%	3	4%	12	16%	8	10%	4	5%
Black or African American	127	15%	72	57%	4	3%	27	21%	21	17%	3	2%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	472	56%	332	70%	26	6%	49	10%	55	12%	10	2%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	7	1%	1	14%	3	43%	0	0%	3	43%	0	0%
Race N/A	166	20%	90	54%	30	18%	21	13%	18	11%	7	4%
Total	849	100%	545	64%	66	8%	109	13%	105	12%	24	3%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

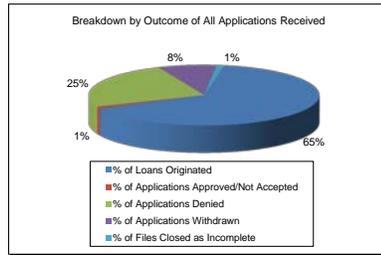
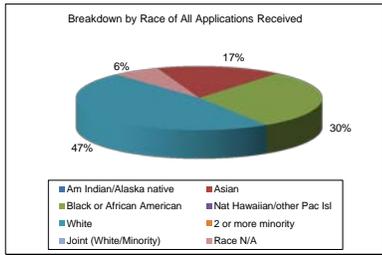


RBSCitizens Bank Low-Income Mortgage Information

2011

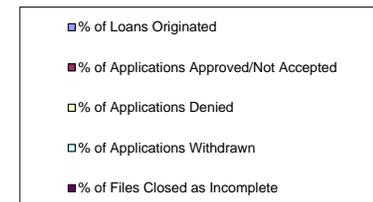
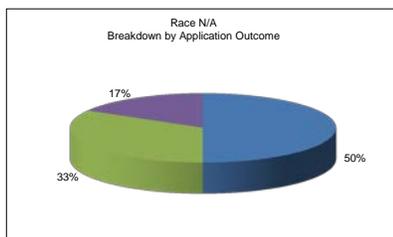
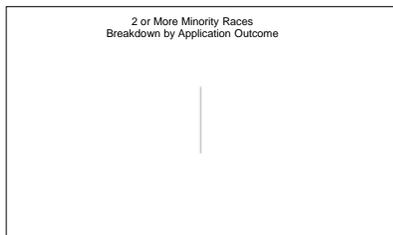
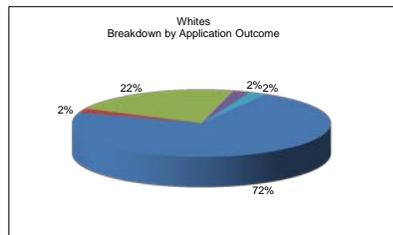
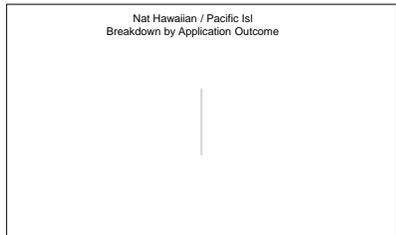
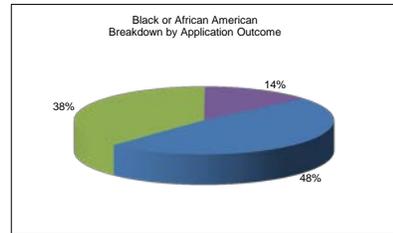
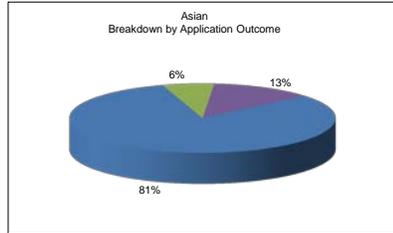
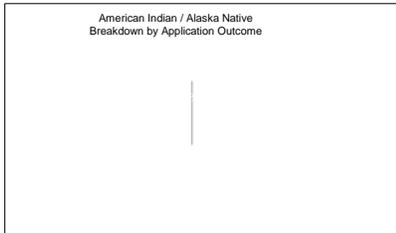
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	16	16%	13	81%	0	0%	1	6%	2	13%	0	0%
Black or African American	29	30%	14	48%	0	0%	11	38%	4	14%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	46	47%	33	72%	1	2%	10	22%	1	2%	1	2%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	6	6%	3	50%	0	0%	2	33%	1	17%	0	0%
Total	97	100%	63	65%	1	1%	24	25%	8	8%	1	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



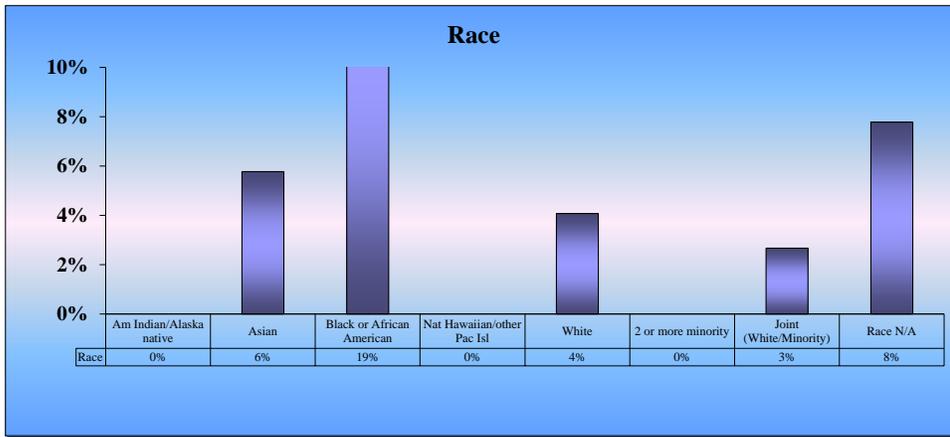
Compared against the MSA Aggregate Total

2011

RBSCitizens Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	77	6%	50	5%	3	6%	12	6%	8	6%	4	13%
Black or African American	127	19%	72	20%	4	10%	27	19%	21	27%	3	14%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	472	4%	332	4%	26	5%	49	5%	55	5%	10	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	7	3%	1	1%	3	21%	0	0%	3	11%	0	0%
Race N/A	166	8%	90	6%	30	24%	21	9%	18	7%	7	8%
Total	849	5%	545	5%	66	9%	109	6%	105	6%	24	6%

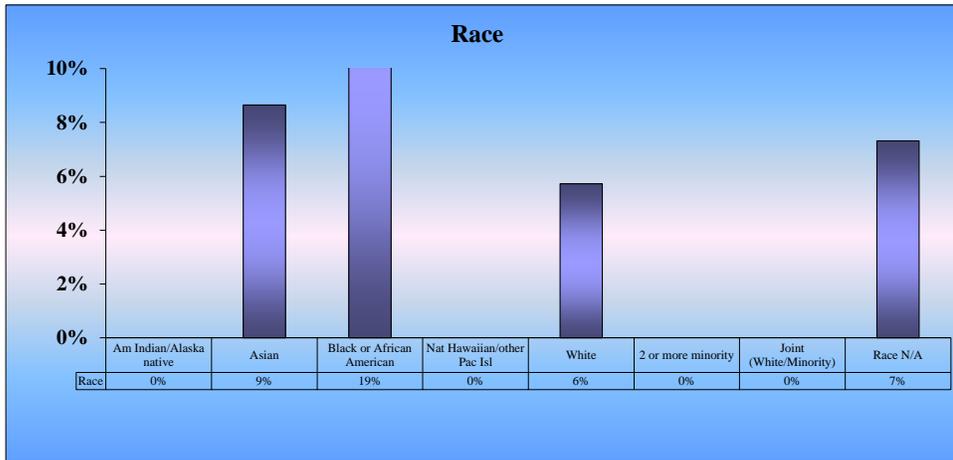
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



RBSCitizens Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	16	9%	13	11%	0	0%	1	2%	2	20%	0	0%
Black or African American	29	19%	14	22%	0	0%	11	18%	4	27%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	46	6%	33	6%	1	4%	10	6%	1	1%	1	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	6	7%	3	10%	0	0%	2	5%	1	13%	0	0%
Total	97	8%	63	9%	1	3%	24	7%	8	8%	1	3%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information





Commonwealth Cooperative Bank



Hyde Park, MA 02136
617-364-6000

**Commonwealth Cooperative Bank
Overview**

Commonwealth Cooperative Bank
1172 River Street
Hyde Park, MA 02136

Description

Commonwealth Cooperative Bank is a \$176.2 million state-chartered co-operative bank with principal offices in Boston, Massachusetts. The bank is the result of a 2008 merger with Hyde Park Cooperative Bank.

The combined institution is primarily a residential lender and offers fixed and adjustable rate mortgage loans to purchase, refinance, and construct one-to-four family dwellings. 78 percent of the bank's loans are secured by one-to-four family dwellings. Commonwealth Cooperative Bank participates in first-time homebuyer programs and a Soft Second program. In 2010, Commonwealth Cooperative operated three branches in Boston.

The most recent CRA assessment, conducted in 2008, refers to the pre-merger Hyde Park Co-operative Bank. The post-merger Commonwealth Cooperative bank has not yet received a CRA evaluation.

Principal Officers

CEO & Chairman

Norman B. Williamson
1172 River Street
Hyde Park, MA 02136
617-364-6000

President & COO

Carol R. McClintock
1172 River Street
Hyde Park, MA 02136
617-364-6000

CFO & Compliance Officer

Robert A. Nelson
1172 River Street

Employees

Number of Employees	27 ¹
Number of Employees in Massachusetts	27
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	3
Branches Within Boston MSA	3
Number of ATMs	2
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	Office of Thrift Supervision
Most Recent Rating	2008
Overall Rating	SATISFACTORY²
Lending Test Rating	NOT RATED
Investment Test Rating	NOT RATED
Service Test Rating	NOT RATED

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by OTS published 2008.



Discussion

The CRA assessment for 2008 refers to the pre-merger Hyde Park Co-operative Bank.

There has been no CRA evaluation since Hyde Park Co-operative Bank's merger with Commonwealth Cooperative Bank. **Ratings are provided for reference only.**

Overall rating: SATISFACTORY³

Hyde Park Co-op Bank demonstrated a satisfactory record of meeting the credit needs of the assessment area. The bank's distribution of loans to low- and moderate-income borrowers surpassed aggregate lending levels.

Lending in low-income geographies was very limited, while lending in moderate-income geographies was commensurate with the aggregate's performance.⁴

Lending Test

Lending Test Rating: NOT RATED

The bank's average loan-to-deposit ratio for the assessment period was 87 percent. This is an improvement from the 60 percent average at the last evaluation, but still lags behind comparable area institutions. Based on the institution's size and competitive factors, the loan-to-deposit meets the standard for satisfactory performance.⁵

The post-merger Commonwealth Cooperative Bank had a 2011 loan-to-deposit ratio of 1.09, a significant improvement.⁶

General Responsiveness to Credit Needs

The bank's overall level of lending represents a reasonable response to community credit needs.

Responsiveness to Low- and Moderate-Income Credit Needs

During the assessment period, the bank's level of lending to low- and moderate-income borrowers

exceeded the aggregate level. The bank was less successful in its penetration of low- and moderate-income geographies.⁷

Innovative or Flexible Lending Practices

During the review period, Hyde Park Bank began offering two new loan programs, MassAdvantage and My Community, both targeted to low- and moderate-income first-time homebuyers.

The bank also participates in the Basic Banking for Massachusetts program. This program was developed by the Massachusetts Community & Banking Council in 1994 as a voluntary program to expand access to bank products and services for those with modest incomes.

Commonwealth Cooperative bank participates in the Soft Second loan program.⁸

Investment Test

Investment Test Rating: NOT RATED

Service Test

Service Test Rating: NOT RATED

Branch Information:

Branch locations in the Boston MSA:

Location	ATM	FSB
3815 Washington Street Jamaica Plain, MA 02130	✓	✓
1172 River Street Hyde Park, MA 02136	✓	✓
Two Center Plaza Boston, MA 02108		✓

FSB: Full Service Branch

Additional Information

The bank's Hyde Park Cooperative Charitable Foundation raises money for charitable, civic, educational, and social projects within the local community. The Foundation, which still operates

³ Based on most recent CRA Performance Evaluation by OTS published 20042008.

⁴ Ibid.

⁵ Ibid.

⁶ FDIC Institution Directory.

⁷ Based on most recent CRA Performance Evaluation by OTS published 20042008.

⁸ Commonwealth Cooperative Bank website.



under the same name, has made donations to a large number of community organizations, including Mass Affordable Housing, the Hyde Park Civic Association, and many others.⁹

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Since 2007, Commonwealth Cooperative Bank has consistently originated over 75% of HMDA loan applications, and nearly 100% of low-income loan applications. The bank's overall lending level has been low but consistent over this period, though low-income applications declined in 2011.¹⁰

	2009	2010	2011
HMDA Applications Received	25	17	28
HMDA Loans Originated	23	13	23
Low-Income Applications Received	6	8	3
Low-Income Loans Originated	6	7	1

Small Business Loans

No 2011 HMDA-reportable small business loan data was available for Commonwealth Cooperative Bank.¹¹

Loan Information By Census Tract

Please refer to the addendum City of Boston 2010 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

⁹ Commonwealth Cooperative Bank website.

¹⁰ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

¹¹ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; April 10, 2008.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Institution Directory:

<http://www2.fdic.gov/idasp>

Commonwealth Cooperative Bank website:

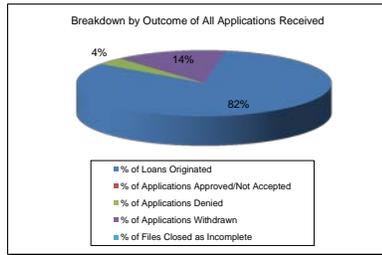
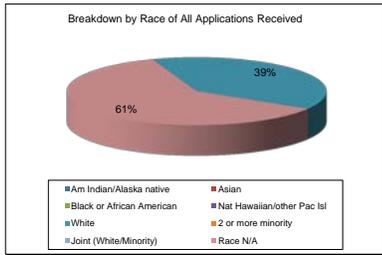
<http://www.commonwealthcoop.com/>

Commonwealth Cooperative HMDA Mortgage Information

2011

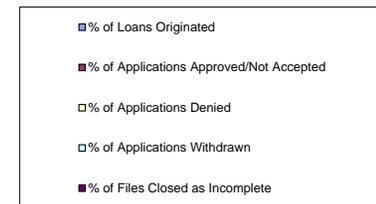
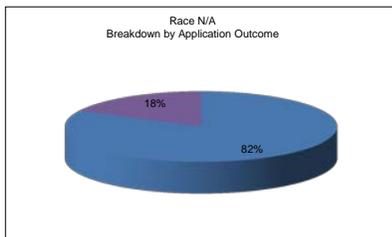
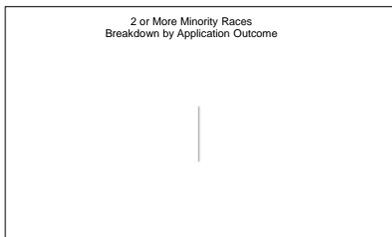
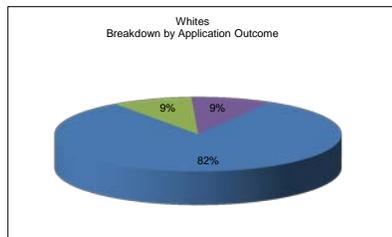
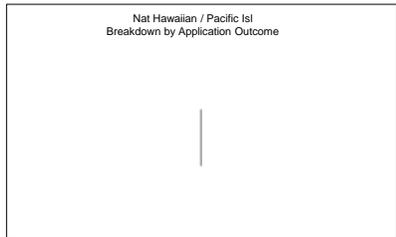
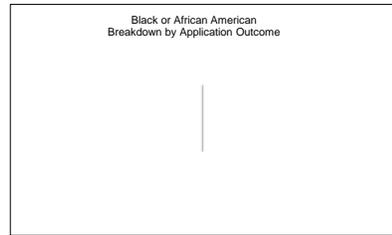
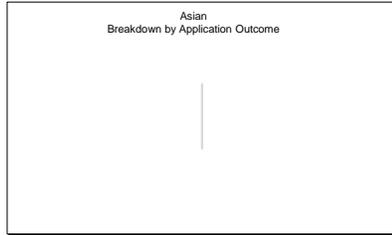
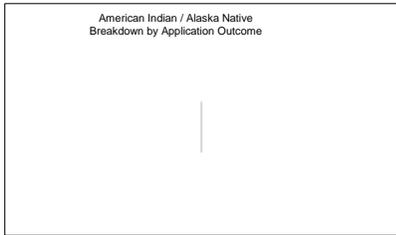
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	11	39%	9	82%	0	0%	1	9%	1	9%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	17	61%	14	82%	0	0%	0	0%	3	18%	0	0%
Total	28	100%	23	82%	0	0%	1	4%	4	14%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

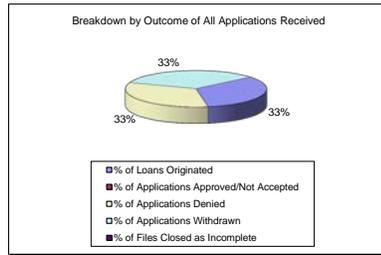
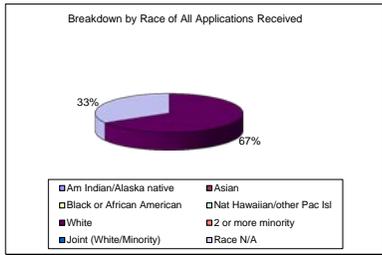


Commonwealth Cooperative Low-Income Mortgage Information

2011

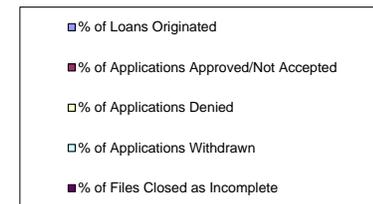
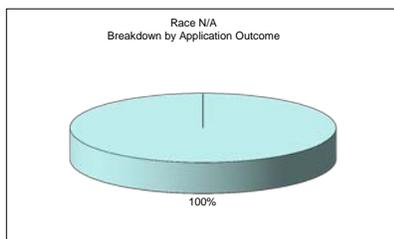
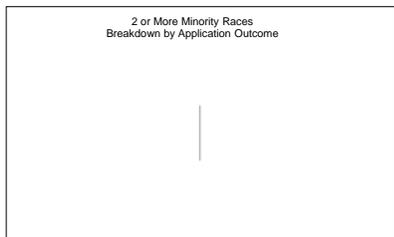
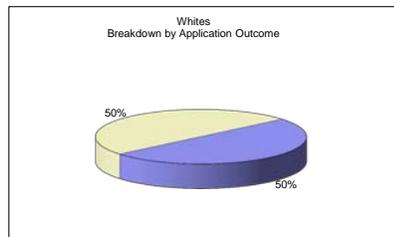
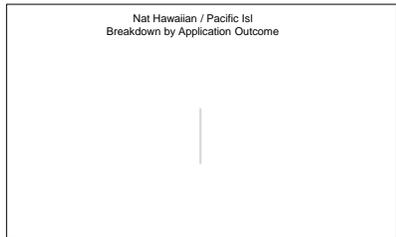
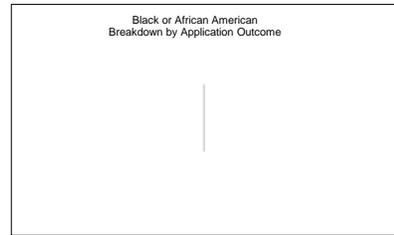
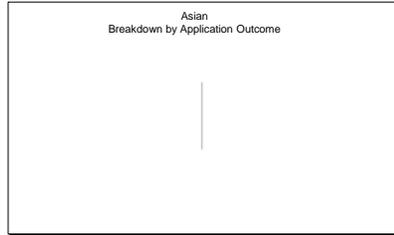
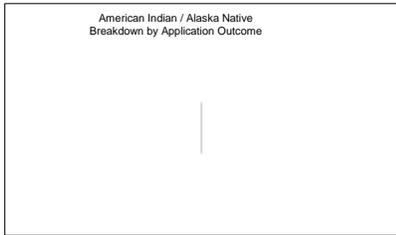
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	67%	1	50%	0	0%	1	50%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	33%	0	0%	0	0%	0	0%	1	100%	0	0%
Total	3	100%	1	33%	0	0%	1	33%	1	33%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



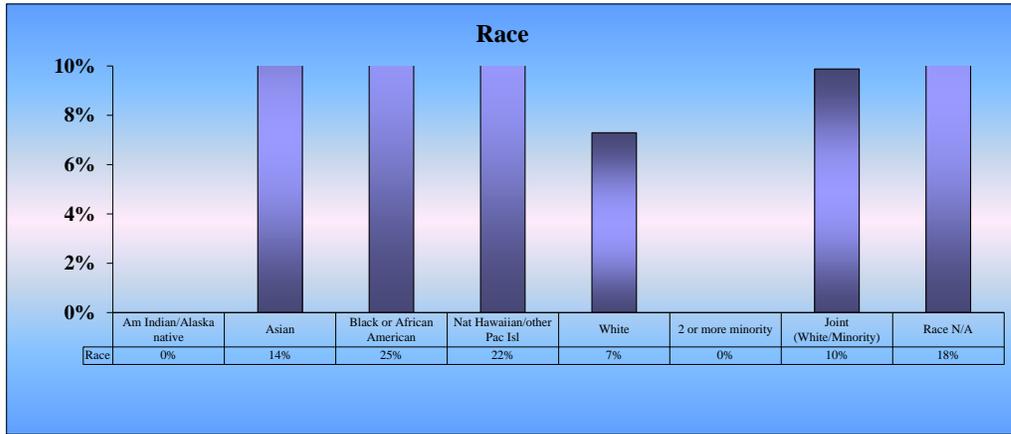
Compared against the MSA Aggregate Total

2011

Commonwealth Cooperative HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	11%	0	0%	0	0%
Asian	0	14%	0	13%	0	3%	0	21%	0	21%	0	10%
Black or African American	0	25%	0	20%	0	3%	0	35%	0	33%	0	30%
Nat Hawaiian/other Pac Isl	0	22%	0	21%	0	0%	0	23%	0	0%	0	100%
White	8	7%	5	7%	0	0%	2	11%	1	12%	0	6%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	10%	0	7%	0	0%	0	26%	0	19%	0	0%
Race N/A	9	18%	8	18%	1	2%	0	25%	0	20%	0	2%
Total	17	10%	13	9%	1	1%	2	17%	1	15%	0	9%

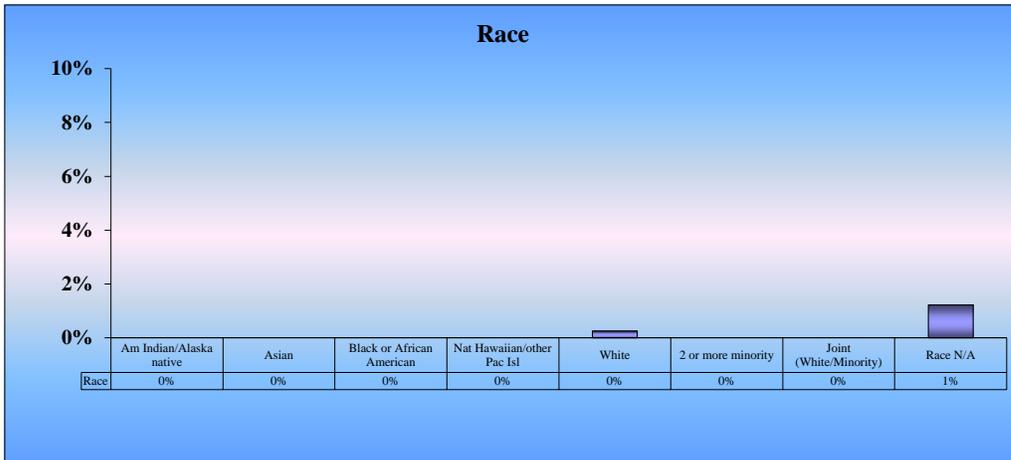
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Commonwealth Cooperative Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	0%	1	0%	0	0%	1	1%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	1%	0	0%	0	0%	0	0%	1	13%	0	0%
Total	3	0%	1	0%	0	0%	1	0%	1	1%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





East Boston Savings Bank



Boston, MA 02128
978-977-2220

East Boston Savings Bank Overview

East Boston Savings Bank
10 Meridian Street
Boston, MA 02128

Description

East Boston Savings Bank (EBSB) is a \$1.95 billion Massachusetts-chartered stock savings bank with its main office in East Boston. EBSB is a subsidiary of Meridian Interstate Bancorp, a bank holding company.

In 2010, Meridian Interstate Bancorp completed its acquisition of Mt. Washington Cooperative Bank, a \$496 million, mutually owned community bank headquartered in South Boston. Mt. Washington Bank now operates as a division of EBSB. The combined bank has 22 full-service branch offices throughout the Boston metropolitan area.

In 2011, the bank opened two new Mt. Washington Bank branches in Boston, one in West Roxbury and one in the South End.

EBSB is primarily a residential real estate lender. 52 percent of the bank’s total loans are residential loans, the majority of which (37.8 percent) are secured by 1-4 family residences. Commercial real estate makes up 37 percent of the bank’s loan portfolio.

Principal Officers

Chairman & CEO

Richard J. Gavegnano
10 Meridian Street
Boston, MA 02128
978-977-2211

President & COO

Deborah J. Jackson
10 Meridian Street
Boston, MA 02128
978-977-8570

CFO

Mark L. Abbate
10 Meridian Street

Employees

Number of Employees	385 ¹
Number of Employees in Massachusetts	385
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	27
Branches Within Boston MSA	13
Number of ATMs	31
Number of Free-Standing ATMs	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2011
Overall Rating	SATISFACTORY²
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by FDIC published 2011.



Discussion

Overall rating: SATISFACTORY³

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁴

EBSB’s Lending Test performance is rated “High Satisfactory.”

Overall, EBSB’s home mortgage and small business lending activity reflects good responsiveness to assessment area credit needs. The bank’s average loan to deposit ratio for the evaluation period (2009-2011) is 82.9 percent, an increase since the prior evaluation. Following the bank’s merger with Mt. Washington Bank, EBSB is ranked 16th out of 442 institutions for home mortgage lending in Massachusetts.⁵

Responsiveness to Low- and Moderate-Income Credit Needs

EBSB’s home mortgage and small business loans display a good dispersion throughout the assessment area, especially in low- and moderate-income geographies, when compared to assessment area’s demographics and aggregate lending performance. EBSB originated 6.2 percent of its home mortgages in low-income census tracts in 2010, and 5.9 percent in 2011. This exceeds both the percentage of owner-occupied housing units located in low-income tracts and the aggregate performance. The bank was even more successful at originating home-purchase loans in low-income census tracts, at 8.5 percent in 2010 and 2011.⁶

EBSB was equally successful at extending home mortgage loans in moderate-income census tracts. This further reflects the Bank’s ability to meet the credit needs of the assessment area’s low-income tracts.⁷

Overall, the borrower distribution of the Bank’s loans is adequate. The distribution of home mortgages reflects adequate penetration among borrowers of different income levels. The bank’s level of lending to low-income borrowers (3.6 percent in 2010) is significantly lower than both the aggregate and the assessment area demographics (31.0 percent and 5.7 percent, respectively). However, EBSB exceeded both demographics (19.8 percent) and the aggregate (20.4 percent) with its lending to moderate-income borrowers: 26.9 percent of loans.

EBSB’s small business activity in the assessment area reflects excellent penetration among businesses of different sizes. A significant majority (82.8 percent in 2010 and 72.7% in 2011), of the Bank’s small business loans were to businesses with GARs of \$1 million or less. This performance exceeds the percentage of businesses of this size, and far exceeds the aggregate performance.⁸

On November 16, 2011, EBSB announced its participation in the Commonwealth of Massachusetts’ Small Business Banking Partnership. Through this initiative, EBSB received \$3 million in State reserve funds on deposit to expand its small business lending. Participation in this program further demonstrates the Bank’s commitment to lending to small businesses throughout its designated assessment area.

Leadership in Community Development Loans

EBSB made an adequate level of community development loans during the evaluation period, demonstrating reasonable responsiveness to the community development credit needs of its assessment area. Between January 2009 and November 2011, the Bank made 11 community development loans totaling \$23.3 million.⁹

Seven of these loans, totaling \$14.1 million, were to two local non-profits that provide affordable housing and/or services for low- and moderate-income individuals.

³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁴ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Ibid.



In August 2011, EBSB made a \$3 million loan to a Dorchester-based non-profit that provides medical and community services to low- and moderate-income individuals.¹⁰

In October 2011, EBSB extended four loans totaling \$12.3 million to a non-profit agency headquartered in Dorchester, whose mission is to help individuals with disabilities attain self-sufficiency through a variety of programs.

In 2010, EBSB established a non-profit entity, Investment in Affordable Housing, LLC, with Neighborhood of Affordable Housing (NOAH) as 1.0 percent owner in the entity. The intention of this LLC is to invest in affordable housing projects, and included a capital injection of \$500,000 by EBSB. While no lending or investment activity has resulted, it is noted that the Bank has proactively sought opportunities for investment in affordable housing through this LLC.¹¹

Innovative and Flexible Lending Practices

EBSB uses innovative and flexible lending programs to meet the credit needs of low- and moderate-income borrowers, first-time homebuyers, and small businesses.¹²

The bank made 331 loans for \$62.4 million through flexible residential lending programs during the evaluation period 2009-2011; however, a significant portion of these (250 loans for \$41.6 million) were made by Mt. Washington Bank in 2009, prior to the bank's acquisition by EBSB.

Several of EBSB's flexible lending programs were discontinued during the evaluation period.

EBSB continues to offer several innovative or flexible lending programs:¹³

- The bank's Credit Builder program helps individuals with poor or non-existent credit to establish a good credit record. During the evaluation period, the Bank originated 398 loans totaling \$540,900 under this program.
- EBSB participates in Federal Housing Administration fixed-rate mortgage programs for

low- and moderate-income homebuyers. In the first ten months of 2011, EBSB made 15 FHA home mortgages totaling \$4.8 million.

- The bank offered several different flexible lending programs through the Massachusetts Housing Financing Agency (MassHousing), including MassHousing Mortgage Programs, and the MassHousing Purchase and Rehabilitation Program.
- EBSB participates in the City of Boston's Financial Assistance Program, which offers downpayment assistance for the purchase of a 1-3 family home. The bank made 16 loans including this assistance through November 2011.

Investment Test

Investment Test Rating:
SATISFACTORY¹⁴

EBSB's Investment Test performance is rated "Satisfactory."

The bank has an adequate level of qualified equity investments. EBSB invested \$7.4 million in Massachusetts Housing Finance Agency bonds, an investment vehicle designed to increase the availability of affordable housing throughout Massachusetts.¹⁵

EBSB made a significant level of qualified charitable donations to help address a wide variety of community development needs within the designated assessment area. The Bank made a majority of its community development donations through the Meridian Charitable Foundation (\$376,026 during the evaluation period) and the Mt. Washington Charitable Foundation (\$295,157 during the evaluation period). All these donations are considered to be for a community development purpose.¹⁶

EBSB also made direct donations to qualified organizations, totaling over \$123,000 in 2011. This includes a \$102,000 contribution to WORK, Inc. Located in a Dorchester, WORK, Inc. provides employment, day habilitation, residential, and family support services to individuals with physical and/or developmental

¹⁰ Ibid.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁵ Ibid.

¹⁶ Ibid.



disabilities.

Service Test

Service Test Rating: HIGH SATISFACTORY¹⁷

EBSB’s Service Test performance is rated “High Satisfactory.”

Description of Service-Delivery Systems

The Bank’s branches, some with 24-hour drive-up ATMs, are located throughout the assessment area and are easily accessible and convenient. Changes in branch locations have improved the accessibility of its delivery systems, particularly to moderate-income geographies, due to the acquisition of Mt. Washington Bank.¹⁸

In 2011, EBSB opened two branches under the Mt. Washington brand: one in an upper-income census tract in West Roxbury, and one in a low-income census tract in South Boston. It also opened one stand-alone ATM in Dorchester. The bank’s record of opening branches improved the accessibility of its delivery systems.

Overall, the Bank’s services and business hours do not vary in a way that would inconvenience any portion of the assessment area.¹⁹

In addition to branch banking, EBSB offers a variety of alternative delivery systems, which enhance the commercial and retail customer accessibility of the bank’s services.

Bilingual employees are available at many branch locations. Languages spoken include Italian, Spanish, French, Mandarin, Portuguese, and Vietnamese. This reflects favorably in terms of workplace diversity and customer service support.²⁰

Community Development Services

EBSB provided a relatively high level of community development services.

Bank management and employees developed and participated in educational seminars targeted toward low- and moderate-income borrowers and first-time homebuyers. The Bank devoted many hours to planning and participating in educational seminars on the homebuying process. The bank organized other educational programs, including a nonprofit executive leadership seminar and the FDIC Money Smart Program.²¹

Bank officers and staff members provided their financial expertise to help address community needs through their involvement in various community organizations. Bank representatives serve in leadership roles in many community-based organizations, including Citizens for Adequate Housing, East Boston Economic Development Council, Federal Home Loan Bank Boston Affordable Housing Program, Fields Corner Community Development Corporation, the Massachusetts Coalition for the Homeless, Massachusetts Housing Finance Agency (“MassHousing”), and many others.

EBSB also has a home mortgage loan modification program for those borrowers who can show an economic hardship. The bank generally follows the Home Affordable Modification Program qualification guidelines.²²

¹⁷ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Ibid.

²² Ibid.



Branch Information:

Branch locations in the Boston MSA:

Location	ATM	FSB
10 Meridian Street East Boston, MA 02128	✓	✓
1 Bennington Street East Boston, MA 02128	✓	✓
856 Bennington Street East Boston, MA 02128	✓	✓
430 West Broadway South Boston, MA 02127	✓	✓
708 East Broadway South Boston, MA 02127	✓	✓
501 Southampton Street South Boston, MA 02127	✓	✓
489 Gallivan Boulevard Dorchester, MA 02124	✓	✓
305 Talbot Avenue Dorchester, MA 02124	✓	✓
515 Centre Street Jamaica Plain, MA 02130	✓	✓
1985 Centre Street West Roxbury, MA 02132	✓	✓
181 Brighton Avenue Allston, MA 02134	✓	✓
455 West Broadway South Boston, MA 02127	✓	✓
1134 Washington Street Boston, MA 02118	✓	✓
294 Bennington Street East Boston, MA 02128	✓	
Caritas Carney Hospital Dorchester, MA 02124	✓	

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

East Boston Savings Bank’s HMDA lending increased nearly five-fold from 2009 to 2010, following the bank’s merger with Mount Washington Bank. Lending levels dropped in 2011 by 20% year over year.

The bank’s low-income lending has remained low, even post-merger.²³

	2009	2010	2011
HMDA Applications Received	69	285	211
HMDA Loans Originated	42	207	165
Low-Income Applications Received	4	12	12
Low-Income Loans Originated	3	4	7

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	0.2%	0.0%	0.1%
Moderate	0.4%	0.8%	0.6%
Middle	0.2%	0.3%	0.4%
Upper	0.0%	0.0%	0.0%
Total	0.2%	0.3%	0.3%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			

²³ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



	2009	2010	2011
Low	0.7%	0.1%	0.4%
Moderate	2.5%	6.9%	6.9%
Middle	0.6%	2.2%	4.1%
Upper	0.0%	0.0%	0.0%
Total	0.9%	2.3%	2.7%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for East Boston Savings Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation for East Boston Savings Bank, Federal Deposit Insurance Corporation; November 17, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Institution Directory:

<http://www2.fdic.gov/idasp>

Meridian Interstate Bancorp, Inc., 2011 Annual Report.

East Boston Savings Bank website:

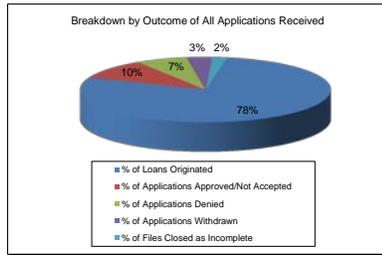
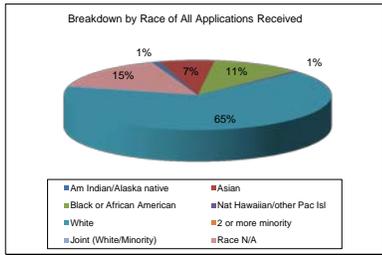
<http://www.ebsb.com/>

East Boston Savings Bank HMDA Mortgage Information

2011

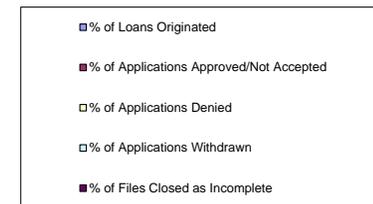
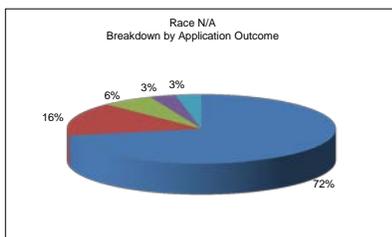
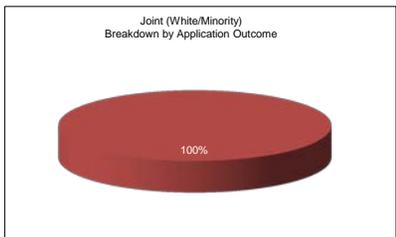
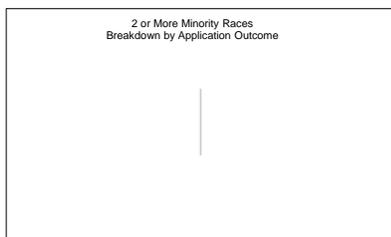
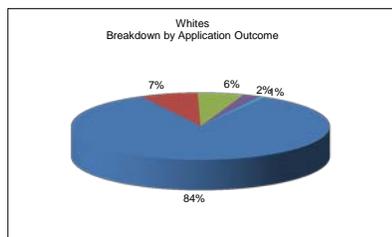
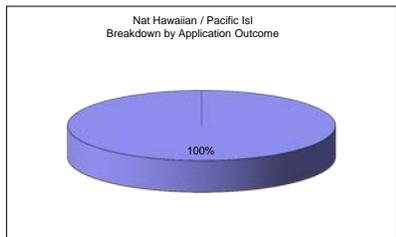
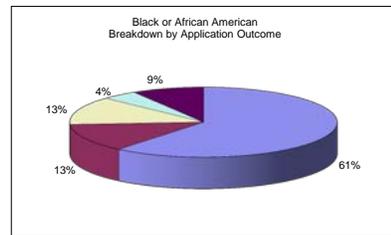
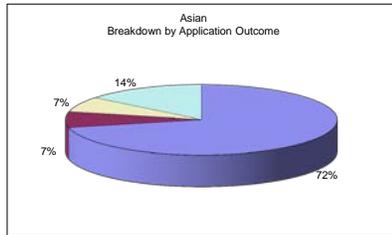
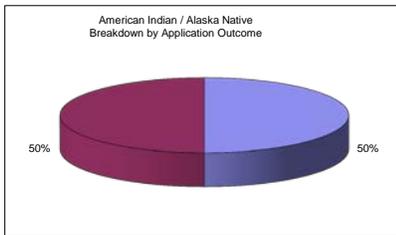
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	2	1%	1	50%	1	50%	0	0%	0	0%	0	0%
Asian	14	7%	10	71%	1	7%	1	7%	2	14%	0	0%
Black or African American	23	11%	14	61%	3	13%	3	13%	1	4%	2	9%
Nat Hawaiian/other Pac Isl	1	0%	1	100%	0	0%	0	0%	0	0%	0	0%
White	138	65%	116	84%	10	7%	8	6%	3	2%	1	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	0	0%	1	100%	0	0%	0	0%	0	0%
Race N/A	32	15%	23	72%	5	16%	2	6%	1	3%	1	3%
Total	211	100%	165	78%	21	10%	14	7%	7	3%	4	2%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

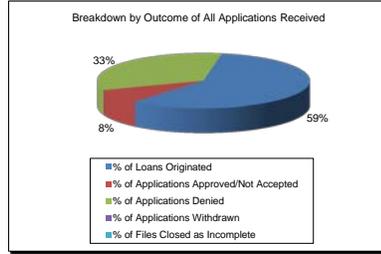
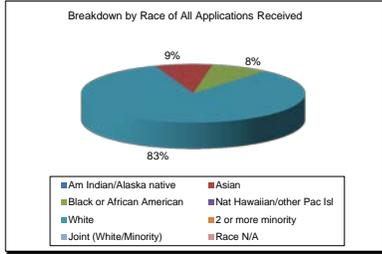


East Boston Savings Bank Low-Income Mortgage Information

2011

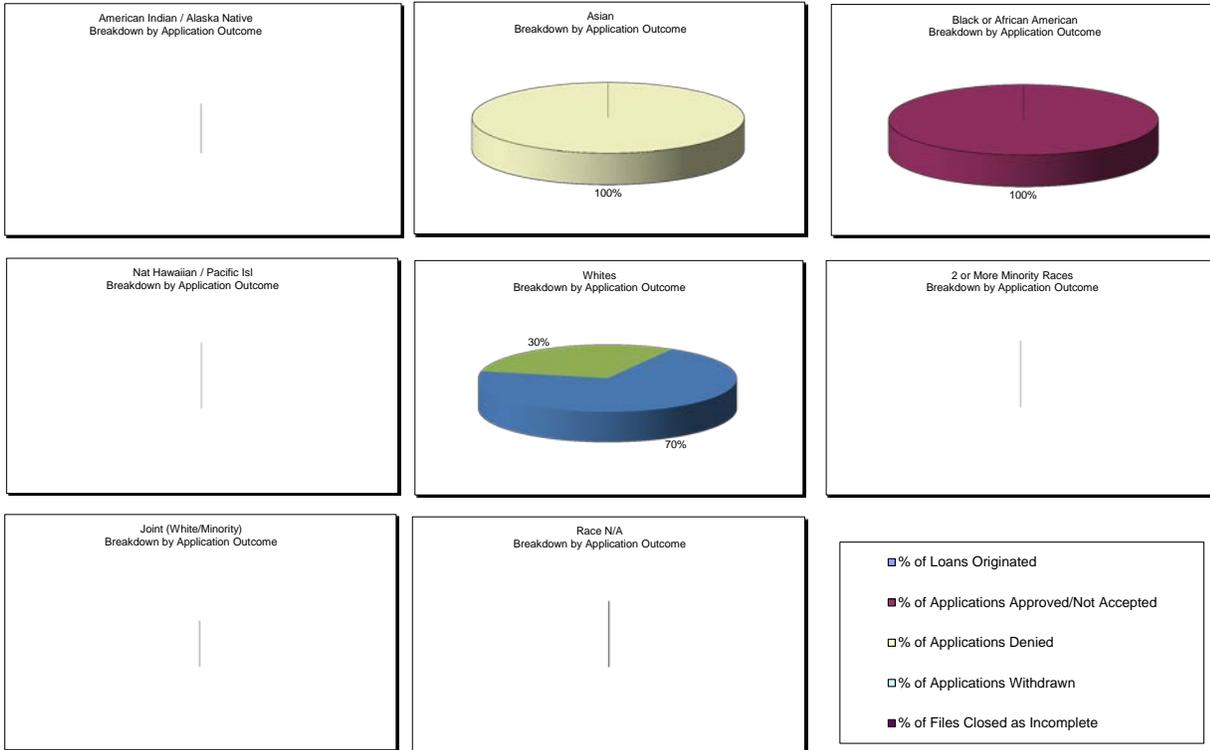
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	8%	0	0%	0	0%	1	100%	0	0%	0	0%
Black or African American	1	8%	0	0%	1	100%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	10	83%	7	70%	0	0%	3	30%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	12	100%	7	58%	1	8%	4	33%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



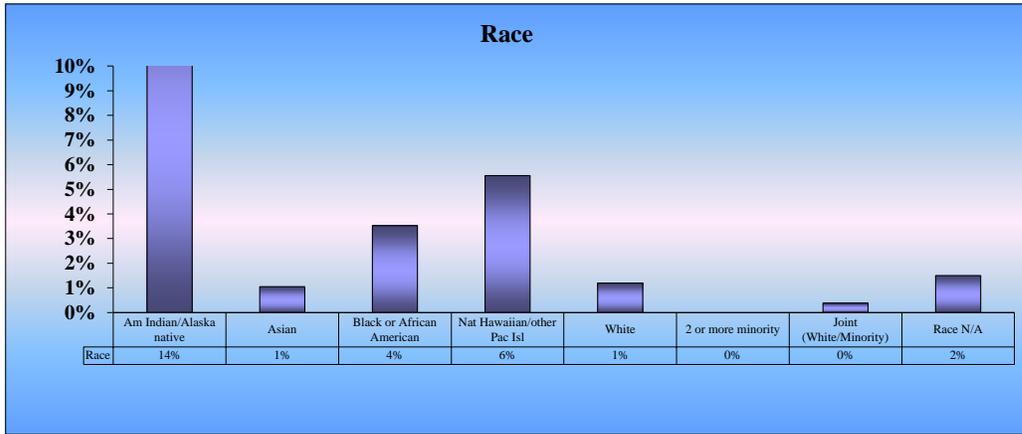
Compared against the MSA Aggregate Total

2011

East Boston Savings Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	2	14%	1	11%	1	50%	0	0%	0	0%	0	0%
Asian	14	1%	10	1%	1	2%	1	0%	2	2%	0	0%
Black or African American	23	4%	14	4%	3	8%	3	2%	1	1%	2	9%
Nat Hawaiian/other Pac Isl	1	6%	1	6%	0	0%	0	0%	0	0%	0	0%
White	138	1%	116	1%	10	2%	8	1%	3	0%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	0	0%	1	7%	0	0%	0	0%	0	0%
Race N/A	32	2%	23	2%	5	4%	2	1%	1	0%	1	1%
Total	211	1%	165	1%	21	3%	14	1%	7	0%	4	1%

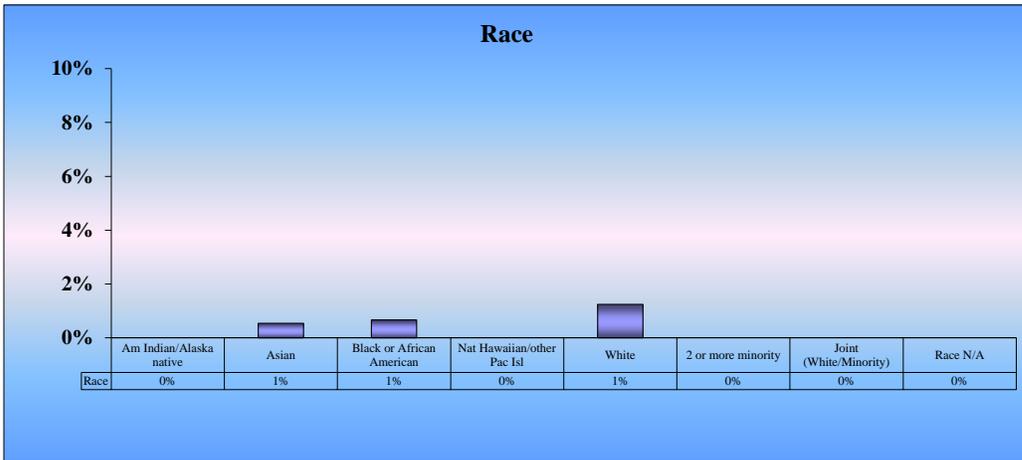
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



East Boston Savings Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	1%	0	0%	0	0%	1	2%	0	0%	0	0%
Black or African American	1	1%	0	0%	1	20%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	10	1%	7	1%	0	0%	3	2%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	12	1%	7	1%	1	3%	4	1%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available



Eastern Bank



Eastern Bank Overview

Eastern Bank & Trust
 265 Franklin Street
 Boston, MA 02110

Description

Eastern Bank, founded in 1818, is the fourth-largest full-service consumer bank in Greater Boston. Eastern Bank is a wholly owned subsidiary of Eastern Bank Corporation, a mutual bank holding company. With \$7.81 billion in assets, Eastern Bank is headquartered in Boston and maintains regional offices in Middleborough and Lynn.

Eastern Bank engages in diverse lines of business, including mortgage banking, small business banking, corporate and asset-based lending, consumer banking and finance, and investment management. Loans represent half of total assets (49.5%); 30.2% of the bank’s loan portfolio is commercial real estate loans, while 36.9% is home mortgage loans.

In June 2010, Eastern Bank Corporation announced its acquisition of Wainwright Bank & Trust, in a transaction valued at \$163 million. The banks’ operations were fully merged in spring 2011.

Principal Officers

Chairman & CEO
 Richard E. Holbrook
 265 Franklin Street
 Boston, MA 02110
 617-897-1008

CFO
 James B. Fitzgerald
 265 Franklin Street
 Boston, MA 02110
 617-897-1008

EVP, Retail Banking
 Joseph F. Riley
 265 Franklin Street
 Boston, MA 02110
 617-897-1008

Employees

Number of Employees	1525 ¹
Number of Employees in Massachusetts	1525
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	99
Branches within Boston MSA	8
Number of ATMs	103
Number of Free-Standing ATMs	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2011
Overall Rating	OUTSTANDING²
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹ FDIC Institution Directory
² Based on most recent CRA Performance Evaluation by FDIC published 2011.



Discussion

Overall rating: OUTSTANDING³

Lending Test

Lending Test Rating:

HIGH SATISFACTORY⁴

Eastern Bank’s lending activity reflected good responsiveness to the credit needs of the assessment area, considering the size of the bank, loan portfolio composition, and the significant level of competition within the assessment area.

General Responsiveness to Credit Needs

Overall, Eastern Bank maintained a reasonable loan-to-deposit ratio, considering the size and financial condition of the bank, merger and acquisition activity, loan volume sold on the secondary market, and assessment area credit needs. The bank’s average loan-to-deposit ratio of 71.3% was comparable to the averages of several similarly situated institutions.⁵

The bank’s home mortgage lending activity reflects good responsiveness to assessment area credit needs. Eastern Bank consistently ranks among the top home mortgage lenders inside its assessment area. For example, in 2009 Eastern Bank was ranked 19th out of 780 competing financial institutions. Those institutions ranking higher were primarily large mortgage companies and large national or regional banks.⁶

This bank’s level of small business lending reflects excellent responsiveness to assessment area credit needs. Eastern Bank was named the number one U.S. Small Business Administration lender in Massachusetts in 2009, 2010, 2011, and 2012; and the number one lender in all of New England in 2010, 2011, and 2012. In 2011 and 2012, the bank deepened its commitment to small business lending by partnering with

microfinance lender Accion USA to bring more affordable loans to entrepreneurs.⁷

Responsiveness to Low- and Moderate-Income Credit Needs

Eastern Bank’s record of extending home mortgage loans to individuals of varying income levels, particularly those of low- and moderate-income, is excellent

For example, in 2009 the bank extended 10.3% of its home mortgage loans to low-income borrowers, nearly twice the aggregate lending performance of 5.7%. The percentage of home mortgages extended to low-income borrowers was 7.2% in 2010. The bank’s performance of lending to low-income borrowers is considered excellent, especially given the high cost of housing in the assessment area.⁸

Eastern Bank’s penetration of home mortgage loans throughout the assessment area, particularly in low- and moderate-income census tracts, is adequate, considering assessment area demographics, competition, and credit needs.⁹

Leadership in Community Development Loans

Eastern Bank continues to demonstrate its leadership in community development lending. Between June 2007 and March 2011, the Bank made 78 community development loans totaling \$68.2 million. These loans have significantly impacted the communities to which they are targeted, and are responsive to assessment area credit needs. Overall, the bank’s record of making community development loans is excellent.¹⁰

In 2010, Eastern Bank extended 24 community development loans totaling \$24.4 million, reflecting a 23% increase in dollar volume compared to 2009. In the first quarter of 2011, the bank extended 11 community development loans totaling \$4.4 million.

³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁴ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁵ Ibid.

⁶ Ibid.

⁷ Eastern Bank Annual Report 2012.

⁸ Based on most recent CRA Performance Evaluation by FDIC published 2011.

⁹ Ibid.

¹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2011.



Innovative & Flexible Lending Practices

Eastern Bank made extensive use of innovative and flexible lending programs that were responsive to assessment area credit needs. In 2010, the bank made 1,017 loans through its innovative or flexible lending programs—a significant increase over 2008 (583 loans) and 2009 (946 loans).¹¹

Eastern Bank has an established record of using innovative and flexible lending programs to serve low- and moderate-income borrowers and geographies, as well as small businesses. Overall, Eastern Bank made excellent use of innovative or flexible lending programs throughout the evaluation period.¹²

The innovative or flexible residential loan programs that the bank participates in include:

- **Massachusetts Housing Finance Agency programs** (124 loans totaling \$22.9 million during the assessment period)
- **Massachusetts Housing Partnership programs** (372 first and second mortgages totaling \$34.5 million)
- **Federal Housing Administration programs** (90 FHA home mortgages totaling \$22.0 million)
- **Federal National Mortgage Association** (8 loans totaling \$1.8 million)
- **Homeowner Options for Massachusetts Elders Reverse Mortgage Program** (7 loans totaling \$1.9 million)

Investment Test

Investment Test Rating:
OUTSTANDING¹³

Eastern Bank’s level of qualified investments and donations is excellent; however, investments are limited in complexity and are routinely provided by other investors. The bank’s qualified investments have community development purposes that benefit communities throughout the bank’s entire assessment area.¹⁴

The amount of the Bank’s total qualified investments, commitments, and grants is \$42.4 million. This total includes \$16.1 million in new investments since mid-2007, \$21.0 million in prior period investments still held by the bank, and \$5.3 million in qualified donations. The bank’s qualified investments totaling \$37,108,971 represented approximately 6.1 percent of Tier 1 capital as of March 31, 2011. This volume of investments and donations demonstrates Eastern Bank’s commitment to investing in community development initiatives.¹⁵

The vast majority of the bank’s grants are made through the Eastern Bank Charitable Foundation. The Foundation was established for the purpose of supporting community, charitable, educational, and other benevolent organizations. Eastern Bank contributes 10 percent of annual pre-tax net operating income to the Charitable Foundation.

Eastern Bank Charitable Foundation extended over \$10 million in total grants between April 2007 and March 2011, which further demonstrates the bank’s commitment to supporting non-profit organizations with diverse missions and goals.¹⁶

Service Test

Service Test Rating: **OUTSTANDING**¹⁷

Eastern Bank’s retail banking services are excellent. The bank’s branch locations and record of opening and closing branches reflects a good penetration in low- and moderate-income geographies. The bank offers a variety of alternative retail banking services, including services targeted toward low- and moderate-income individuals.¹⁸

Description of Service-Delivery Systems

Eastern Bank operates 99 full-service branch offices. Eastern Bank’s acquisition of Wainwright Bank added 16 full-service branches throughout Greater Boston in 2011.

¹¹ Ibid.

¹² Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁸ Ibid.



Branch hours are convenient and comparable to other institutions, and vary according to location based on the needs of each individual community. In addition to branch banking, Eastern Bank implements a number of alternative delivery systems that enhance customer accessibility to services regardless of geographic location.

Eastern Bank participates in the Massachusetts Community and Banking Council's Basic Banking Program. This program encourages financial institutions to offer low-cost checking and savings accounts for people with modest incomes.

Community Development Services

Eastern Bank has taken a leadership role in providing community development services throughout its assessment area by involvement in numerous financial education events and seminars targeted toward the needs of low- and moderate-income individuals. Bank employees of all levels have contributed technical and financial expertise to affordable housing, economic development, and community organizations throughout the assessment area.¹⁹

Eastern Bank is a designated member of the Money Smart Alliance, which was established to recognize the efforts of people and companies who share the FDIC's commitment to actively building the personal financial skills of adults and teenagers. The bank invested in a training program for employees utilizing the FDIC's Money Smart program.

In June 2010, the bank sponsored a Money Smart "Train-the-Trainer" session, which included training by the FDIC. The purpose was to provide guidance to various non-profit agencies on how to deliver quality financial education. In 2010 alone, bank employees conducted ten classes for various community-based organizations and schools.²⁰

During the CRA evaluation period, the bank was involved in 85 homebuyer seminars, 55 financial literacy training events, and 13 foreclosure

prevention seminars. These events were offered through community organizations throughout Massachusetts.

Educational outreach at this level indicates the Bank's dedication to raising the degree of financial literacy in the communities it serves.²¹

Eastern Bank's directors, officers, and employees at various levels actively sought opportunities for participation in, and were actively involved with, several community development organizations throughout the assessment area as representatives of the bank.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
246 Border Street Boston, MA 02128	✓	✓
155 Dartmouth Street Boston, MA 02116	✓	✓
63 Franklin Street Boston, MA 02110	✓	✓
265 Franklin Street Boston, MA 02110	✓	✓
470 West Broadway Boston, MA 02127	✓	✓
1906 Dorchester Avenue Dorchester, MA 02124	✓	✓
687 Centre Street Jamaica Plain, MA 02130	✓	✓
2029 Centre Street West Roxbury, MA 02132	✓	✓

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Eastern Bank's HMDA lending dipped 37% from 2009 to 2010, before recovering in 2011.

Low-income loans also fell in 2010, before rising in 2011 to 19 originations.²²

¹⁹ Based on most recent CRA Performance Evaluation by FDIC published 2011.

²⁰ Ibid.

²¹ Ibid.



	2009	2010	2011
HMDA Applications Received	205	137	182
HMDA Loans Originated	132	83	115
Low-Income Applications Received	44	18	32
Low-Income Loans Originated	24	11	19

Total	7.6%	8.4%	9.6%
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Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	2.3%	2.3%	2.4%
Moderate	0.5%	1.6%	1.1%
Middle	0.9%	1.4%	1.2%
Upper	1.5%	1.8%	1.4%
Total	1.2%	1.7%	1.5%

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Eastern Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	13.3%	14.4%	16.4%
Moderate	3.5%	6.1%	5.3%
Middle	6.1%	6.7%	8.4%
Upper	6.3%	7.4%	7.9%

²² FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; June 20, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2010.

Eastern Bank Annual Report, 2010 and 2012.

Eastern Bank Charitable Foundation Annual Report, 2012.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

Eastern Bank website:

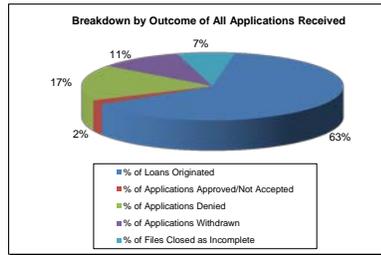
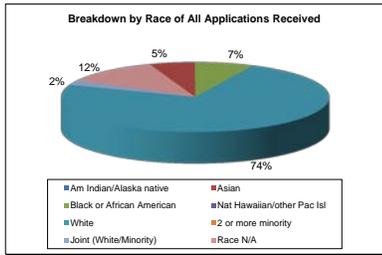
<http://www.easternbank.com/>

Eastern Bank HMDA Mortgage Information

2011

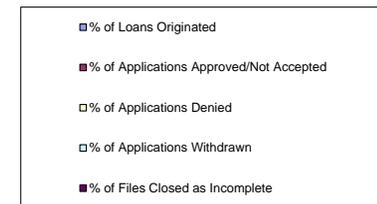
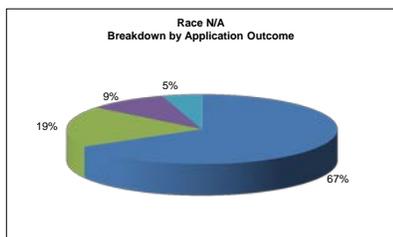
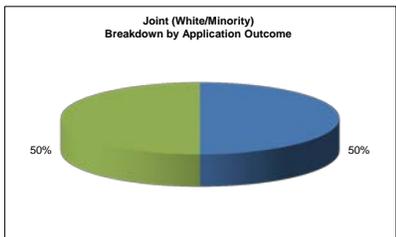
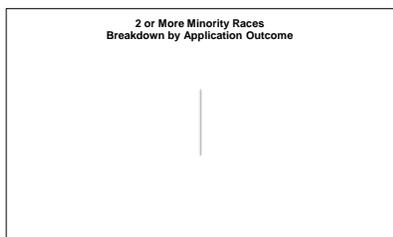
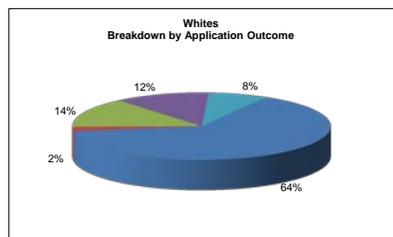
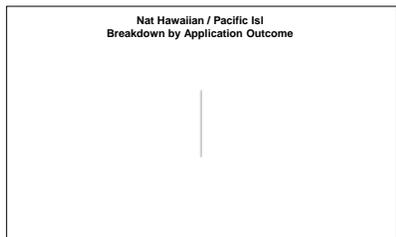
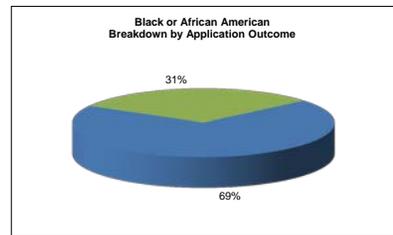
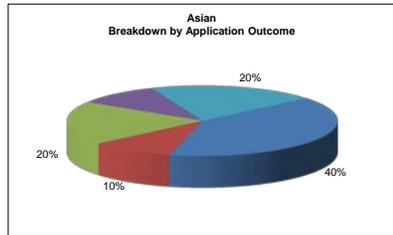
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	10	5%	4	40%	1	10%	2	20%	1	10%	2	20%
Black or African American	13	7%	9	69%	0	0%	4	31%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	134	74%	86	64%	3	2%	19	14%	16	12%	10	7%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	2%	2	50%	0	0%	2	50%	0	0%	0	0%
Race N/A	21	12%	14	67%	0	0%	4	19%	2	10%	1	5%
Total	182	100%	115	63%	4	2%	31	17%	19	10%	13	7%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



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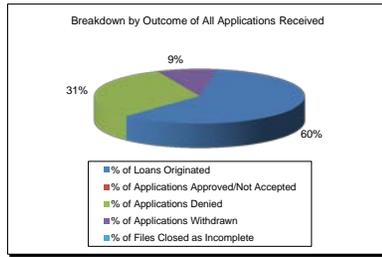
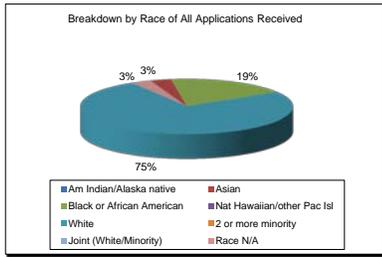


Eastern Bank Low-Income Mortgage Information

2011

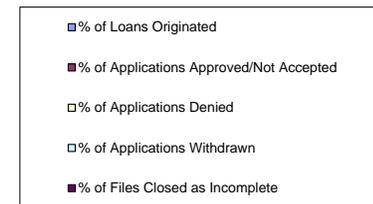
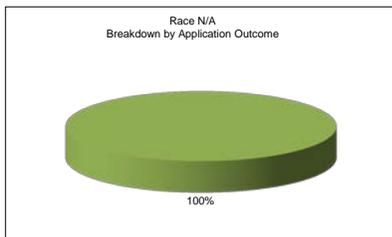
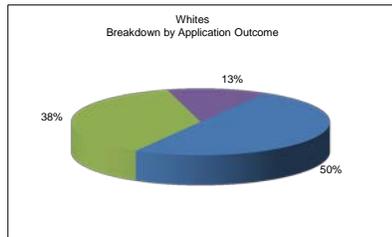
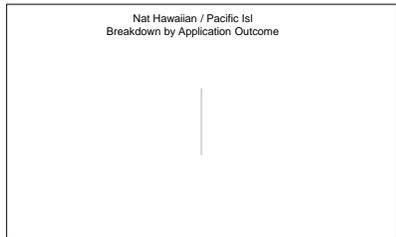
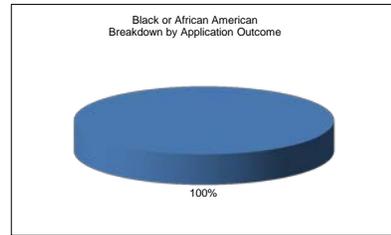
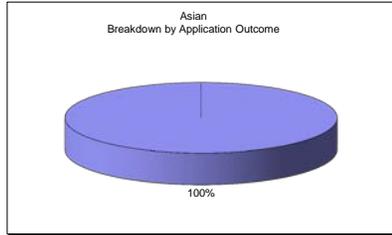
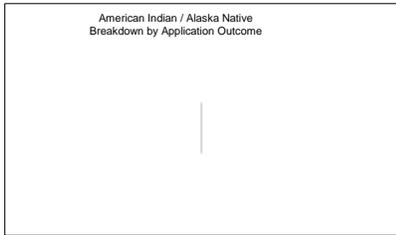
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	3%	1	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	6	19%	6	100%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	24	75%	12	50%	0	0%	9	38%	3	13%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	3%	0	0%	0	0%	1	100%	0	0%	0	0%
Total	32	100%	19	59%	0	0%	10	31%	3	9%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



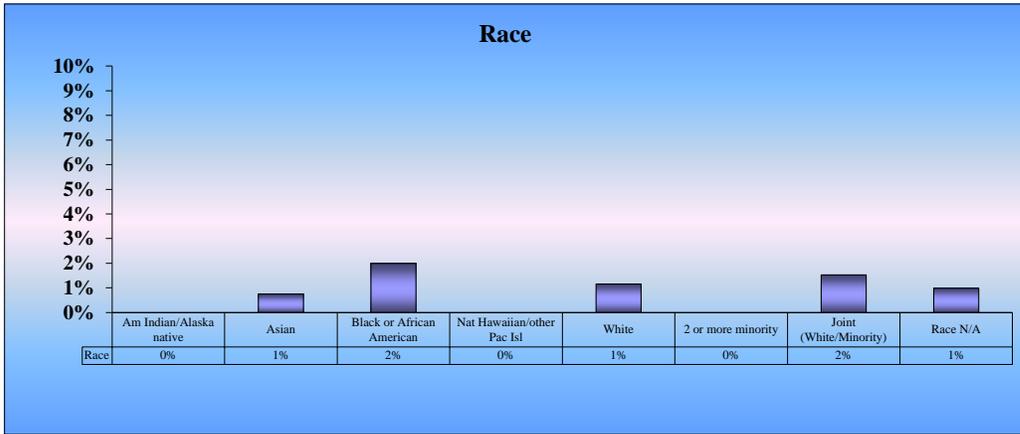
Compared against the MSA Aggregate Total

2011

Eastern Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	10	1%	4	0%	1	2%	2	1%	1	1%	2	6%
Black or African American	13	2%	9	2%	0	0%	4	3%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	134	1%	86	1%	3	1%	19	2%	16	1%	10	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	2%	2	1%	0	0%	2	7%	0	0%	0	0%
Race N/A	21	1%	14	1%	0	0%	4	2%	2	1%	1	1%
Total	182	1%	115	1%	4	1%	31	2%	19	1%	13	3%

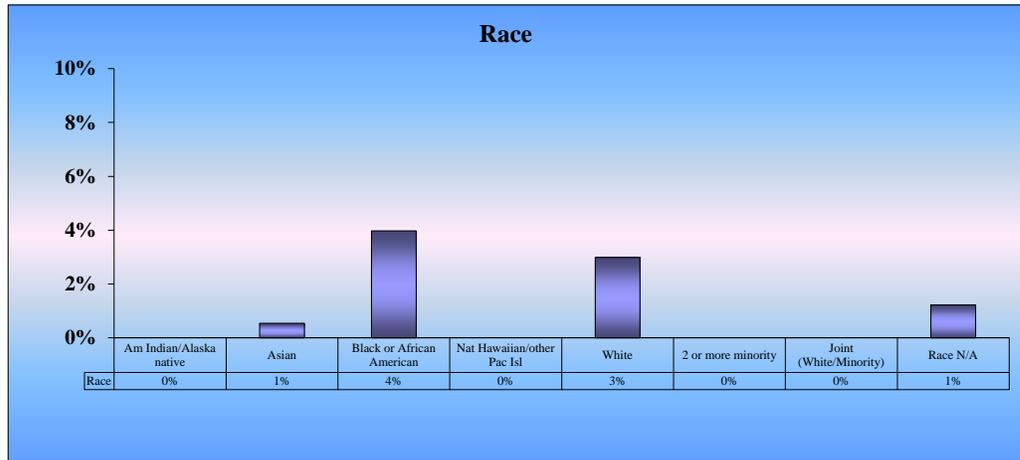
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Eastern Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	1%	1	1%	0	0%	0	0%	0	0%	0	0%
Black or African American	6	4%	6	9%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	24	3%	12	2%	0	0%	9	5%	3	4%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	1%	0	0%	0	0%	1	3%	0	0%	0	0%
Total	32	3%	19	3%	0	0%	10	3%	3	3%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available





First Trade Union Bank



617-482-4000

CFO

Paul S. Musgrove
One Harbor Street, Suite 201
Boston, MA 02210
617-482-4000

Chief Risk Officer

Shepard D. Rainie
One Harbor Street, Suite 201
Boston, MA 02210
617-482-4000

First Trade Union Bank Overview

First Trade Union Bank
One Harbor Street, Suite 201
Boston, MA 02210

Description

First Trade Union Bank (FTUB) is an interstate federal stock savings bank headquartered in Boston, Massachusetts, with total assets of \$608 million. The New England Carpenters Pension Fund, the New England Carpenters Guaranteed Annuity Fund, and the Empire State Carpenters Pension Fund collectively hold 100 percent of the Bank’s stock.

The bank’s primary business focuses on serving middle market, small business, unions, and government entities. A significant portion of the bank’s deposits and much of its lending are derived from its relationship with the controlling carpenters unions and trade union members.

In recent years, the bank has scaled back its operations; management used this as a strategic opportunity to focus on better serving the credit needs of customers in the Massachusetts and New York assessment areas. The bank’s assets declined 12% between 2007 and mid-2011, while deposits and total loans declined 15% and 27%, respectively, during the same time period.

FTUB’s deposit base is concentrated in Massachusetts, which has more than 95% of total deposits. Residential real estate loans make up 46% of the bank’s lending by dollar amount.¹

Principal Officers

President & CEO

Michael A. Butler
One Harbor Street, Suite 201
Boston, MA 02210

Employees

Number of Employees	73 ²
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	4
Branches in Boston MSA	2
Number of ATMs	5
Number of Free-Standing ATMs	1

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2011
Overall Rating	SATISFACTORY³
Overall rating, Massachusetts	SATISFACTORY
Lending Test Rating, Massachusetts	OUTSTANDING
Community Development Test Rating, Massachusetts	SATISFACTORY

¹ Based on most recent CRA Performance Evaluation by OCC published 2011.

² FDIC Institution Directory.

³ Based on most recent CRA Performance Evaluation by OCC published 2011.



Discussion

First Trade Union Bank’s CRA performance was evaluated under the OCC Intermediate Small Savings Association Examination Procedures. This evaluation procedure includes a lending test and a community development test. The discussion below focuses on the ratings specifically pertaining to the bank’s Massachusetts activities.

Since the previous CRA examination, FTUB has improved its overall examination ratings from “Needs to Improve” to “Satisfactory,” both for its total performance rating, and for its Massachusetts rating.

**Overall rating, Massachusetts:
SATISFACTORY⁴**

Lending Test

**Lending Test Rating, Massachusetts:
OUTSTANDING⁵**

First Trade Union Bank’s performance under the lending test in Massachusetts is rated “Outstanding.” The bank’s distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes. The bank’s geographic distribution of loans reflects excellent dispersion in the low- and moderate-income census tracts, among both individuals and businesses.⁶

General Responsiveness to Credit Needs

FTUB’s level of lending, as reflected in its average net loan-to-deposit ratio, is more than reasonable given the size and financial condition of the institution, as well as the assessment areas’ credit needs and relevant competitive factors.

The bank’s net loan-to-deposit ratio, which includes purchased loans, averaged 92% during the period of the latest CRA review. FTUB’s loan-to-deposit ratio is slightly higher than the

national peer bank median quarterly average of 88% over the same period.⁷

Responsiveness to Low- and Moderate-Income Credit Needs

FTUB’s distribution of loans in the Boston MSA reflects excellent penetration among individuals of different income levels and businesses of different sizes. In Boston, the percentage of home purchase loans FTUB originated to low- and moderate-income families is greater than the percentage of low and moderate-income families residing in Boston.⁸

The bank’s performance is considered outstanding given the lack of affordable housing and high competition in the Boston MSA. Because Boston’s median housing prices remain high relative to median incomes, lack of affordable housing limits lending opportunities.

FTUB’s geographic distribution of loans also reflects excellent penetration among individuals and among businesses in the low and moderate-income census tracts. The proportion of home purchase loans originated in low-income census tracts significantly exceeds the percentage of owner-occupied housing in the low-income tracts. The same is true for the proportion of FTUB’s lending for home purchases, refinances, and home improvement loans in moderate-income tracts in Boston.

Given the low percentage of owner-occupied housing in Boston’s low-income geographies, FTUB’s overall dispersion is considered excellent.⁹

⁴ Based on most recent CRA Performance Evaluation by OCC published 2011.

⁵ Ibid.

⁶ Ibid.

⁷ Based on most recent CRA Performance Evaluation by OCC published 2011.

⁸ Ibid.

⁹ Ibid.



Community Development Test

Community Development Test Rating,
Massachusetts: SATISFACTORY¹⁰

First Trade Union Bank’s performance under the community development test in Massachusetts is rated Satisfactory. FTUB’s community development performance demonstrates adequate responsiveness to community development needs through community development loans, investments, and services.¹¹

Community Development Lending

The bank’s level of community development lending is Satisfactory. FTUB extended one community development loan for \$600,000 in Massachusetts during the evaluation period. The loan funded the construction of a building to house qualified low-income community businesses and a nonprofit organization that seeks to increase affordable homeownership across Massachusetts.¹²

During the majority of the CRA evaluation period, the bank’s ability to make commercial loans was impacted by the terms of an agreement with its regulatory agency. This agreement precluded FTUB from underwriting new community development loans during the period.

Community Development Investments

FTUB made a satisfactory level of community development investments and donations. During the assessment period, the bank made \$3.7 million in investments: two community development investments, and 16 community development grants.¹³

Both of the bank’s two new community development investments provided low- and moderate-income mortgages in Massachusetts.

The bank made \$37,000 in qualified community development grants and donations. These benefited eight different community

development organizations, five of which are located in Boston.

Community Development Services

The bank provides a satisfactory level of community development services. During the evaluation period, two bank officers provided financial expertise and leadership services to two qualified community development organizations serving the greater Boston area.¹⁴

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
One Harbor Street Boston, MA 02210	✓	✓
750 Dorchester Avenue Suite 2100 Boston, MA 02125	✓	✓
One Design Center Place Boston, MA 02210	✓	
88 Black Falcon Avenue Boston, MA 02210	✓	

FSB: Full Service Branch

Neither of FTUB’s free-standing ATMs accepts deposits.

¹⁰ Based on most recent CRA Performance Evaluation by OCC published 2011.

¹¹ Ibid.

¹² Based on most recent CRA Performance Evaluation by OCC published 2011.

¹³ Based on most recent CRA Performance Evaluation by OCC published 2011.

¹⁴ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

First Trade Union Bank originated one HMDA-reportable loan in Boston in 2009, and two in 2010 and in 2011. The bank originated one low-income loan in 2009 and in 2010, but none in 2011.¹⁵

	2009	2010	2011
HMDA Applications Received	2	2	2
HMDA Loans Originated	1	2	2
Low-Income Applications Received	1	1	0
Low-Income Loans Originated	1	1	0

Small Business Loans

No 2011 HMDA-reportable small business loan data was available for First Trade Union Bank.¹⁶

Loan Information By Census Tract

Please refer to the addendum [City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

¹⁵ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

¹⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; October 31, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

First Trade Union Bank Annual Report 2009.

First Trade Union Bank website:

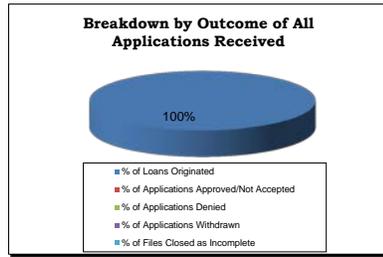
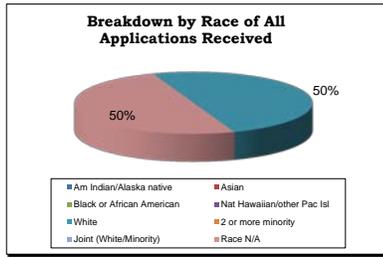
<http://www.ftub.com/>

First Trade Union Bank HMDA Mortgage Lending

2011

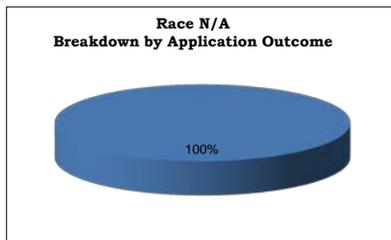
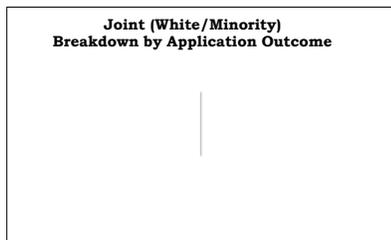
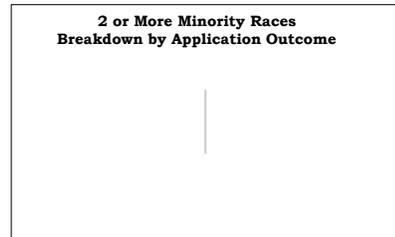
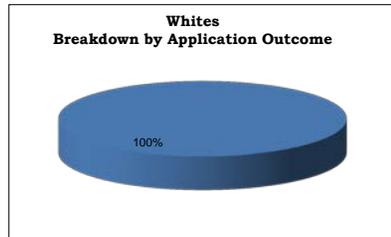
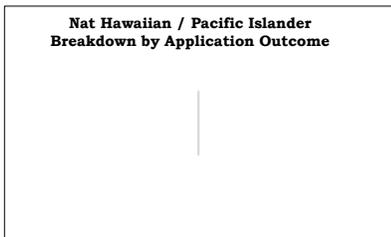
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	50%	1	100%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	50%	1	100%	0	0%	0	0%	0	0%	0	0%
Total	2	100%	2	100%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



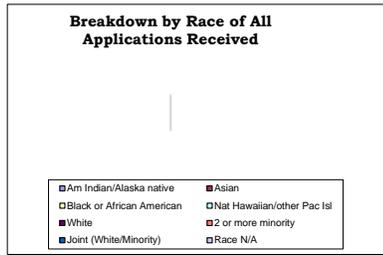
- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

First Trade Union Bank Low-Income Mortgage Lending

2011

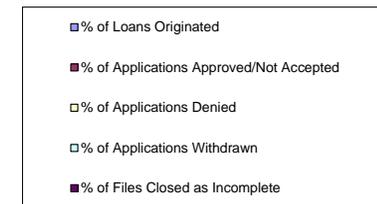
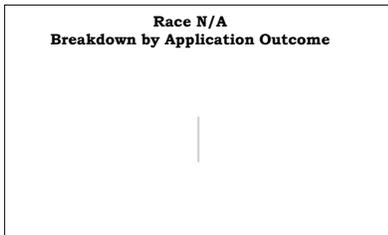
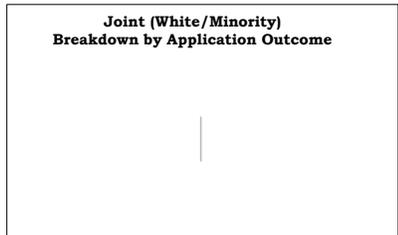
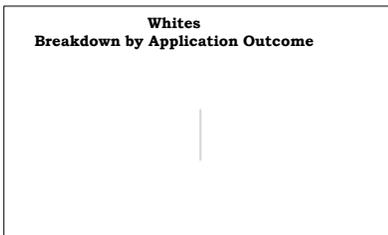
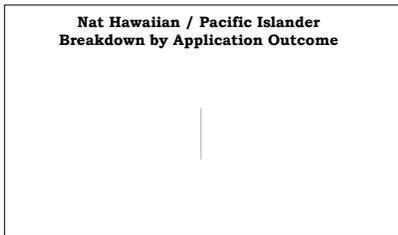
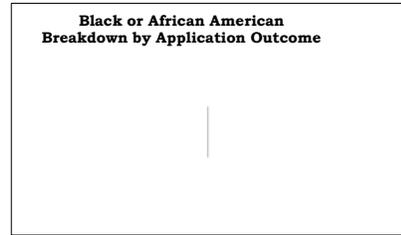
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Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



Compared against the MSA Aggregate Total

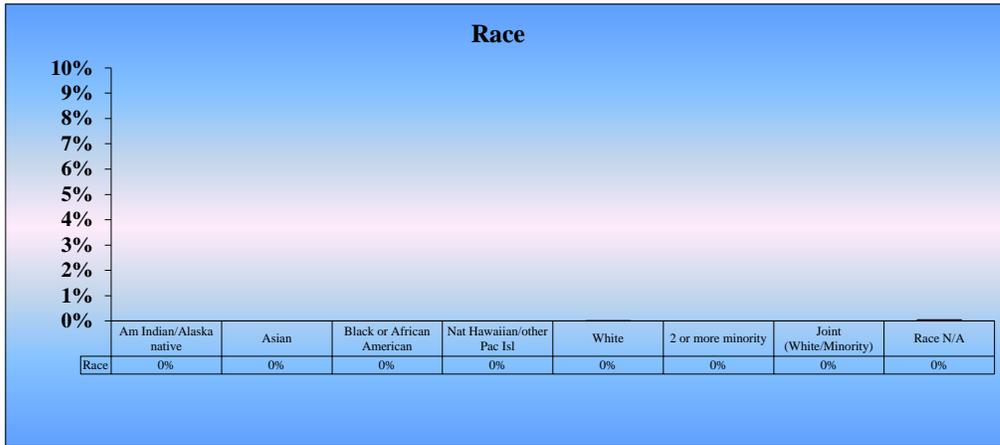
2011

First Trade Union Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
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Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	0%	1	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	0%	1	0%	0	0%	0	0%	0	0%	0	0%
Total	2	0%	2	0%	0	0%	0	0%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.

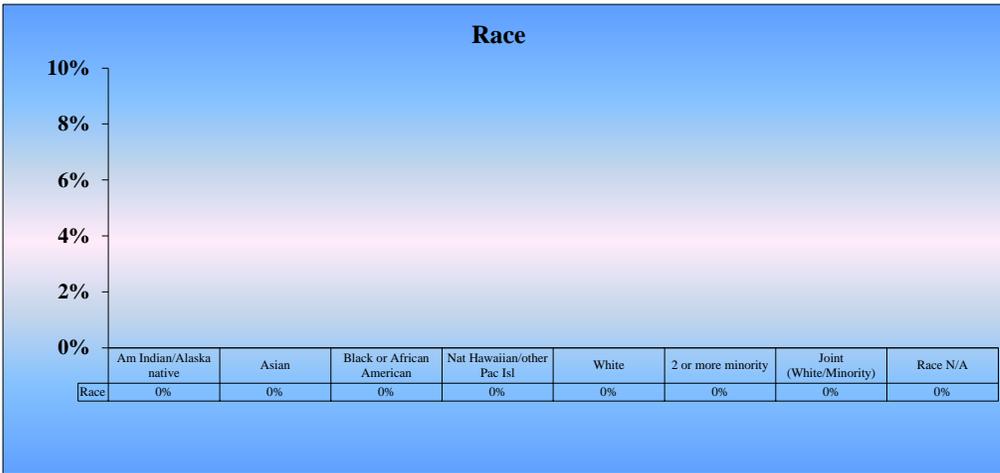


First Trade Union Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information



JPMorgan Chase Bank



212-270-6000

Compliance Officer
Martha J. Gallo
1111 Polaris Highway
Columbus, OH 43240
212-270-6000

JPMorgan Chase Bank Overview

JPMorgan Chase Bank, N.A.
1111 Polaris Highway
Columbus, OH 43240

Description

JPMorgan Chase Bank, N.A. is a subsidiary of JPMorgan Chase & Co., a global financial services firm with assets of \$2.3 trillion and operations in more than 40 countries. The bank has over \$1.8 trillion in assets.

A component of the Dow Jones Industrial Average, JPMorgan Chase & Co. is one of the largest originators and servicers of home mortgages in the country. The bank has one of the largest branch networks in the United States, with over 5,500 branches and 17,000 ATMs in 23 states. The bank’s retail network operates under the Chase brand.

The firm’s Retail Financial Services division provides a range of financial services to consumers and small businesses, though its retail presence in Massachusetts is minimal. The bank is the nation’s largest SBA lender.

In 2008, JPMorgan Chase acquired Washington Mutual Bank after Washington Mutual was seized by the FDIC.

No CRA information is reported about JPMorgan Chase Bank’s Massachusetts activities. The most recent review, conducted in 2007, did not evaluate the bank’s presence in Massachusetts. Ratings are provided for reference only.

Principal Officers

Chairman and CEO, JPMorgan Chase & Co.
Jamie Dimon
1111 Polaris Highway
Columbus, OH 43240
212-270-6000

CFO

Douglas L. Braunstein
1111 Polaris Highway
Columbus, OH 43240

Employees

Number of Employees	200,884 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	5508
Branches Within Boston MSA	0
Number of ATMs	17,235
Number of Free-Standing ATMs	11,727

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2007
Overall Rating	OUTSTANDING²
Lending Test Rating	OUTSTANDING
Investment Test Rating	HIGH SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by OCC published 2007.



Discussion

Overall rating: OUTSTANDING³

JPMorgan Chase Bank (JPMC Bank) received a CRA evaluation in January 2007. Massachusetts was not among in the bank’s CRA assessment areas, as the bank does not operate any branches in Massachusetts. Therefore, **the evaluation did not include any Boston information.** Ratings and information are included below as a reference only.

Lending Test

Lending Test Rating: OUTSTANDING⁴

JPMC Bank’s lending performance is excellent. The bank made a high volume of community development loans, with an excellent level of responsiveness to identified needs in the bank’s assessment areas.⁵

General Responsiveness to Credit Needs

JPMC Bank’s overall lending activity is excellent. The bank typically generated a large volume of loans in its markets, often despite strong competition. In most of its assessment areas, the bank is among the market leaders. The bank’s volume of loans originated reflects the bank’s resources and capacity.⁶

Responsiveness to Low- and Moderate-Income Credit Needs

JPMC Bank’s distribution of loans to geographies of different income levels is good. Home purchase and small business lending each show good penetration in low- and moderate-income geographies, while home improvement and refinance lending demonstrated excellent penetration.

The bank’s distribution of loans to borrowers of different income levels is good. Home purchase lending distribution is considered adequate.

Leadership in Community-Development Loans

In total, JPMC Bank made over \$5.7 billion in community development loans in the bank’s CRA rating areas in the period under review. Most (53 percent) of the community development loans made by the bank provided needed affordable housing. Another 23 percent of community development loans provided social services that assisted low- and moderate-income individuals, and 22 percent helped to revitalize or stabilize low- or moderate-income geographies.⁷

Investment Test

Investment Test Rating: HIGH SATISFACTORY⁸

JPMC Bank’s overall investment performance is good. This bank’s volume of qualified investments and grants made during the evaluation period, and the remaining value of investments originated in prior periods, demonstrates excellent responsiveness to the community development needs of its communities, particularly affordable housing for low- and moderate-income individuals.

In total, JPMC Bank made over \$3.9 billion in community development investments and grants within its assessment areas in the period reviewed. Of this, approximately \$1.5 billion was originated in the current evaluation period and \$2.4 billion was originated in prior periods and remains outstanding.⁹

A vast majority of the total investments (93 percent) provided affordable housing, an identified need in many communities. In addition, the bank made \$94.9 million in grants to national organizations, \$87.7 million of which went to one organization, Consumer Credit Counseling Service (CCCS). These grants demonstrate the bank’s commitment to community development efforts throughout its assessment areas and broader regional areas.

JPMC Bank and bank affiliates responded to affordable housing needs primarily through

³ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁴ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Based on most recent CRA Performance Evaluation by OCC published 2007.

⁹ Ibid.



investment in Low-Income Housing Tax Credit (LIHTC) investments or acting as an equity placement agent for other investors into the LIHTC market. The bank is consistently among the top investors in the LIHTC market.¹⁰ The bank also participates in New Markets Tax Credits (NMTC), a federal program that creates incentives for investments in low-income communities. In 2011, the bank invested \$900 million in NMTC projects.¹¹

In 2011, the bank provided nearly \$400 million in loans and donations to Community Development Financial Institutions and other intermediaries with a community development purpose.¹²

Service Test

Service Test Rating: HIGH SATISFACTORY¹³

Description of Service-Delivery Systems

JPMC Bank’s branch network is accessible to geographies and individuals of different income levels in the bank’s assessment areas. The bank’s record of opening and closing branch offices has not affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies.¹⁴

While branch hours vary by assessment area and within assessment areas, overall they do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies.

Branch Information

JPMC Bank has no branches in Boston or in Massachusetts. It operates one free-standing ATM in East Boston.

Location	ATM	FSB
1 Harborside Drive Boston, MA 02128	✓	

Community Development Services

JPMC Bank had an excellent level of community development services. In many of the bank’s assessment areas, the bank provides financial services training to first-time homebuyers as well as to homeowners trying to preserve their homes. Frequently, the bank’s services involve ongoing relationships with organizations that work on affordable housing and other community development goals.¹⁵

¹⁰ Ibid.

¹¹ JPMorgan Chase Corporate Responsibility Report, 2011.

¹² JPMorgan Chase Corporate Responsibility Report, 2011.

¹³ Based on most recent CRA Performance Evaluation by OCC published 2007.

¹⁴ Ibid.

¹⁵ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

JPMorgan Chase Bank has originated no HMDA-reportable loans in the Boston MSA since it established a presence in Massachusetts in 2005.¹⁶

	2009	2010	2011
HMDA Applications Received	0	0	0
HMDA Loans Originated	0	0	0
Low-Income Applications Received	0	0	0
Low-Income Loans Originated	0	0	0

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	0.5%	0.4%	0.1%
Moderate	0.4%	0.3%	0.2%
Middle	0.6%	0.4%	0.3%
Upper	0.3%	0.3%	0.1%
Total	0.5%	0.4%	0.2%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	1.0%	0.3%	0.1%
Moderate	0.4%	0.4%	0.2%
Middle	0.5%	0.3%	0.4%
Upper	0.3%	0.2%	0.1%
Total	0.6%	0.3%	0.2%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for JPMorgan Chase Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; January 1, 2007.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

JPMorgan Chase & Co. Annual Report, 2010 and 2011.

JPMorgan Chase Corporate Responsibility Report, 2011.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

JPMorgan Chase Bank website

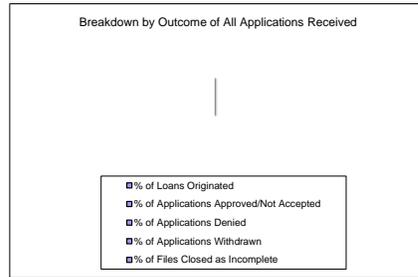
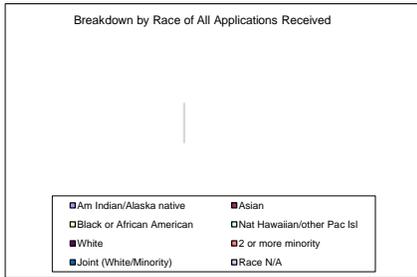
<http://www.jpmorganchase.com/>

JPMorgan Chase Bank HMDA Mortgage Information

2011

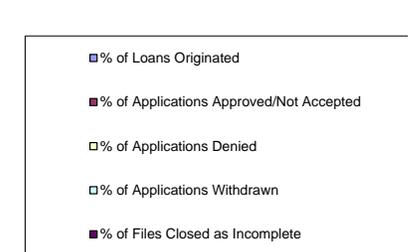
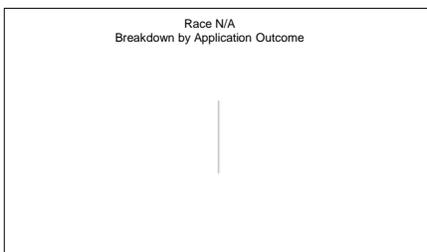
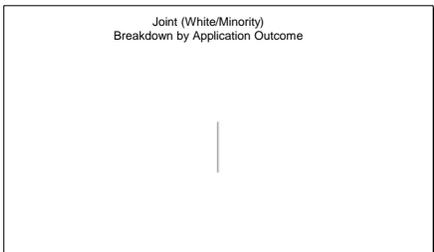
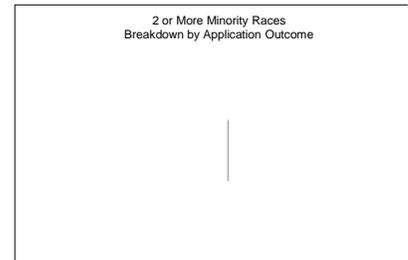
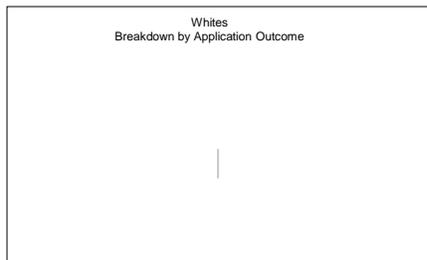
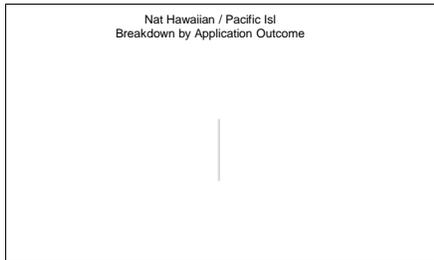
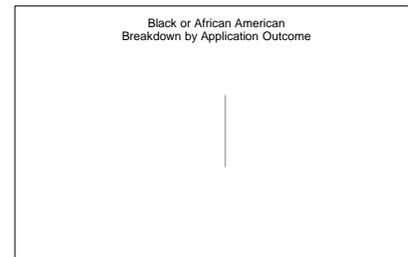
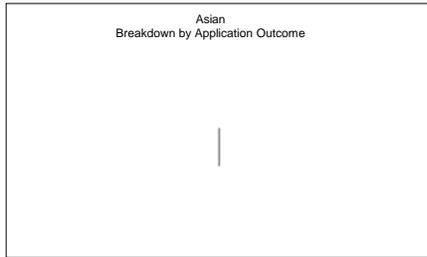
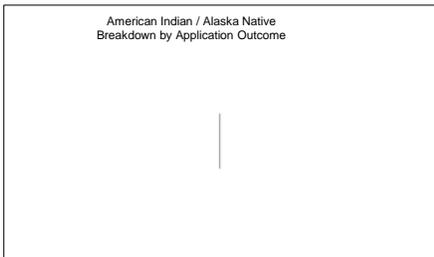
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

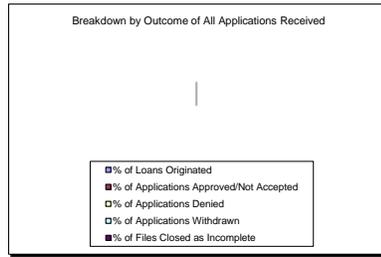
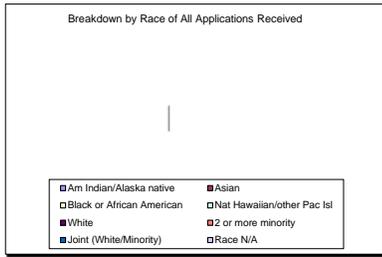


JPMorgan Chase Bank Low-Income Mortgage Information

2011

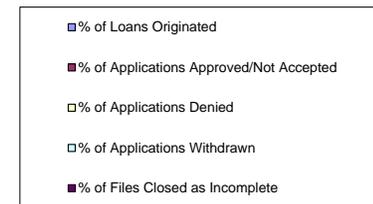
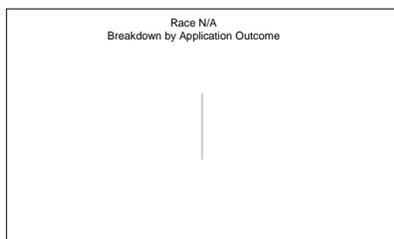
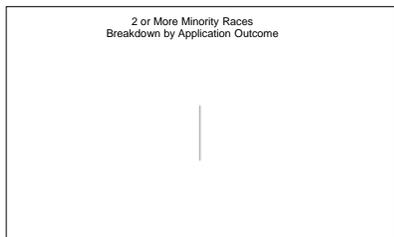
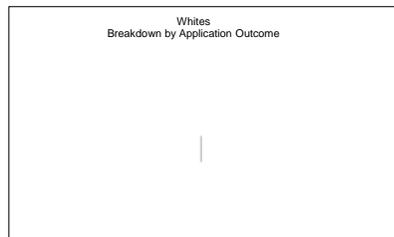
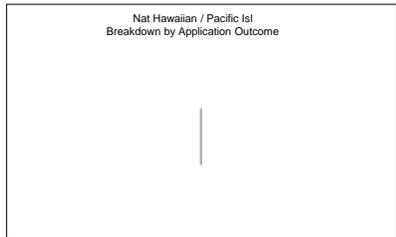
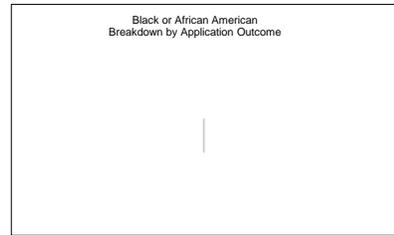
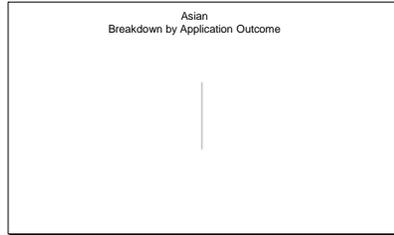
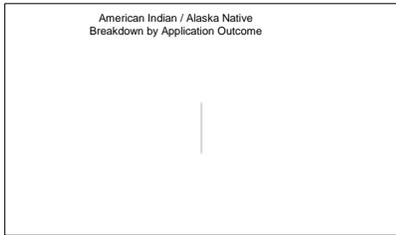
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.





Employment Information



OneUnited Bank



OneUnited Overview

OneUnited Bank
100 Franklin Street
Boston, MA 02110

Description

OneUnited Bank is a minority-owned, commercially-chartered financial institution headquartered in Boston, Massachusetts. Its current asset size is \$562.4 million. OneUnited maintains two branches in Boston, two in Florida, and five in California.

The institution was created as the result of the consolidation of four minority-owned banks: Boston Bank of Commerce in Boston, Massachusetts; Peoples National Bank of Commerce in Miami, Florida; Founders National Bank in Los Angeles, California; and Family Savings Bank in Los Angeles, California.

OUB’s current business focus is primarily the origination of multifamily residential real estate loans (which make up 76 percent of the bank’s loans). The bank’s lending in Massachusetts and Florida has been extremely limited. In 2010, with new senior management in the lending area, OneUnited launched a new residential lending program and re-launched its multifamily lending program. Between 2010 and 2011, the bank’s multifamily real estate portfolio grew by 10%.

Principal Officers

Chairman & CEO

Kevin Cohee
100 Franklin Street, Suite 600
Boston, MA 02110
617-457-4400

President

Teri Williams
100 Franklin Street, Suite 600
Boston, MA 02110

617-457-4400

CFO

John Trotter
100 Franklin Street, Suite 600
Boston, MA 02110
617-457-4400

Chief Lending Officer

Cecilia Isaac
100 Franklin Street, Suite 600
Boston, MA 02110
617-457-4400

Employees

Number of Employees	94 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches – Total	9
Branches Within Boston MSA	3
Number of ATMs	0
Number of Free-Standing ATMs	0

CRA Rating for Massachusetts

Rating Agency	FDIC
Most Recent Rating	2010
Overall Rating	NEEDS TO IMPROVE ²
Lending Test Rating	SUBSTANTIAL NONCOMPLIANCE
Community Development Test Rating	NEEDS TO IMPROVE

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by FDIC published 2007.



Discussion

Based on the bank’s asset size, its CRA performance was evaluated using the Interagency Intermediate Small Institution Examination Procedures, which consist of a Lending Test and a Community Development Test.

The bank was assessed both on its overall performance, and on its California, Massachusetts, and Florida operations individually. The discussion below focuses on the bank’s Massachusetts ratings. In the bank’s Massachusetts and California assessment areas, it received a rating of “Needs to Improve”; in Florida, it was rated “Substantial Noncompliance.”³

The FDIC also reviewed OneUnited’s compliance with fair lending regulations, and identified multiple violations of the Federal Reserve Board’s Regulation B – Equal Credit Opportunity Act during the period under review.⁴

Overall rating in Massachusetts:
NEEDS TO IMPROVE⁵

Lending Test

Lending Test Rating in Massachusetts:
SUBSTANTIAL NONCOMPLIANCE⁶

General Responsiveness to Credit Needs

OneUnited’s lending activity in Massachusetts is considered very poor. The bank’s volume of lending was extremely low. No mitigating factors explain or justify the bank’s failure to meet the standards for a “Satisfactory” rating, particularly in Massachusetts.⁷

The bank originated only five home mortgage loans in Massachusetts during the entire CRA

review period, with no loans at all originated in 2009.

This level of lending is well below the standards of satisfactory performance given OneUnited’s asset size, business focus, branch structure, and the lending opportunities in Massachusetts.⁸

In the Boston MSA, the bank has made only one HMDA-reportable home mortgage loan since 2006. The bank made no HMDA-reportable home mortgage loans in Boston in 2011.⁹

The limited resources that OneUnited devoted to loan production had a significant negative impact on OneUnited’s lending activity. The bank did not hire a Chief Lending Officer until December 2009, and the lack of sufficient lending resources and staff appreciably diminished OneUnited’s lending activity bank-wide.¹⁰

OneUnited’s poor lending performance is considered especially egregious because the bank has been designated as a Community Development Financial Institution (CDFI) since July 1997. The CDFI program is a U.S. government-sponsored initiative created to expand the availability of credit, capital, and financial services in distressed urban and rural communities. The program provides financial assistance to institutions that serve these communities and low-income individuals.¹¹

Responsiveness to Low- and Moderate-Income Credit Needs

OneUnited Bank’s performance in meeting the needs of low- and moderate-income borrowers in Massachusetts was very poor due to the bank’s low volume of lending.¹²

In 2008, the bank made one loan in a low-income tract and one loan in a moderate-income tract. As noted above, the bank did not originate any loans in Massachusetts in 2009. In 2010, the bank originated just three loans, two in

³ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁴ Ibid.

⁵ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁶ Ibid.

⁷ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁸ Ibid.

⁹ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2011.

¹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹¹ Ibid.

¹² Based on most recent CRA Performance Evaluation by FDIC published 2010.



moderate-income tracts and one in an upper-income tract.¹³

Though the bank hired additional lending staff in late 2009 and early 2010, there has been little effect on the Bank's lending activity in Massachusetts.

In the Boston MSA, OneUnited Bank has made no low-income HMDA loans since 1998.¹⁴

Community Development Test

Community Development Test Rating in Massachusetts: **NEEDS TO IMPROVE**¹⁵

OneUnited Bank's overall community development performance demonstrates poor responsiveness to the community development needs of Massachusetts, considering the institution's capacity and the need and availability of such opportunities in Massachusetts.¹⁶

Lending

OneUnited's community development lending is considered poor based on the Bank's size, resources, and needs of the assessment areas.¹⁷

The only community development loan the bank made in Massachusetts during the review period (2007-2010) was a single \$600,000 community development loan that provided affordable rental housing.

This represents a significant decrease in the number of community development lending since the previous evaluation (2005-2007).

Investments

A review of the Bank's qualified investments revealed a poor level of charitable contributions in Massachusetts. The bank made only \$15,350 in charitable contributions over the period 2007-

2010. There were no additional equity investments or other qualified investments made in Massachusetts.¹⁸

Given the size of the institution and the fact that OneUnited is chartered in Massachusetts, the volume of qualified investments in Massachusetts is considered less than adequate.¹⁹

Service

The overall level of community development services provided by OneUnited is considered marginally adequate.²⁰

Two of the bank's full-service branch locations in Boston are in low-income census tracts.

Individual officers supported two community development organizations in Boston, as well as other national organizations. These individuals served in leadership roles at the organizations, including Board positions, and provided the organizations with their financial expertise and experience.

OneUnited is active in providing and supporting financial literacy initiatives in the area. During the review period, the bank made several presentations in Massachusetts discussing the availability of affordable real estate, financing, and FDIC insurance.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
648 Warren Street Dorchester, MA 02121		✓
100 Franklin Street Boston, MA 02110		✓
2343 Washington Street Roxbury, MA 02119		✓

FSB: Full Service Branch

¹³ Ibid.

¹⁴ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2011.

¹⁵ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹⁶ Ibid.

¹⁷ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ Based on most recent CRA Performance Evaluation by FDIC published 2010.



The bank’s location at 100 Franklin Street, Boston, does not handle any cash transactions.

OneUnited does not own or operate any ATMs at any of its branches.

Special Note

In October 2008, the FDIC issued a cease-and-desist order to OneUnited Bank. According to the Order, the FDIC and the Massachusetts Division of Banks “determined that it had reason to believe that the Bank had engaged in unsafe or unsound banking practices and violations of law.”²¹

Among other issues, regulators cited bank for “operating with an inadequate level of capital for the kind and quality of assets held,” “engaging in speculative investment practices,” “operating without an effective loan documentation program,” and “allowing the payment of excessive compensation, fees and benefits to its senior executive officers.”²²

In early 2009, the bank received \$12 million in TARP funds. In the ethics investigation that followed, Rep. Maxine Waters (D-California) was accused of political interference in the bailout decision. As of mid-2011, the bank has yet to repay any of its bailout money, having skipped nine consecutive quarterly payments in violation of its agreement with the federal government.²³

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Between 2007 and 2011, OneUnited originated only one HMDA loan in the Boston MSA (in 2010).

OneUnited Bank has not originated any low-income HMDA loans in Boston since 1998.²⁴

	2009	2010	2011
HMDA Applications Received	0	3	2
HMDA Loans Originated	0	1	0
Low-Income Applications Received	0	1	2
Low-Income Loans Originated	0	0	0

Small Business Loans

No 2011 HMDA-reportable small business loan data was available for OneUnited Bank.²⁵

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

²¹ Federal Deposit Insurance Corporation & The Commonwealth of Massachusetts Division of Banks to OneUnited Bank – Order To Cease And Desist; FDIC-08-294b; Issued October 27, 2008.
²² Ibid.

²³ The Boston Globe, Banks Tap Fund to Repay TARP, Todd Wallack, 20 June 2011.

²⁴ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

²⁵ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Source Documents

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; October 4, 2010.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

Federal Deposit Insurance Corporation & The Commonwealth of Massachusetts Division of Banks to OneUnited Bank – Order To Cease And Desist; FDIC-08-294b; Issued October 27, 2008.

FDIC Information Directory:

<http://www2.fdic.gov/idasp/main.asp>

OneUnited website:

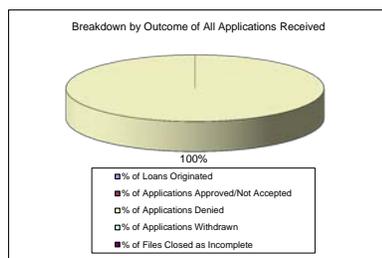
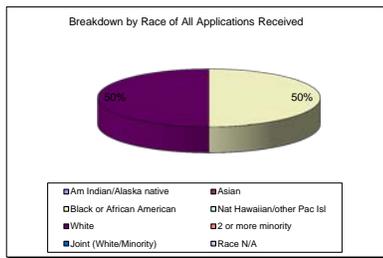
<http://www.oneunited.com/>

OneUnited Bank HMDA Mortgage Lending

2011

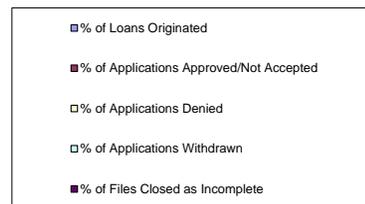
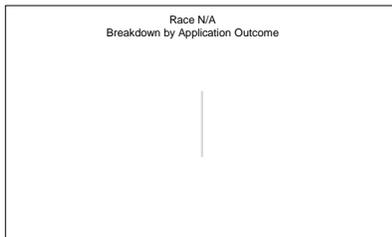
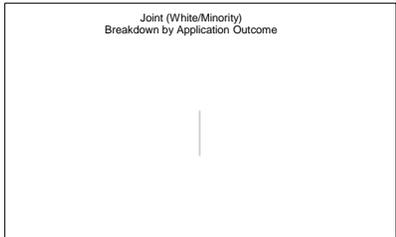
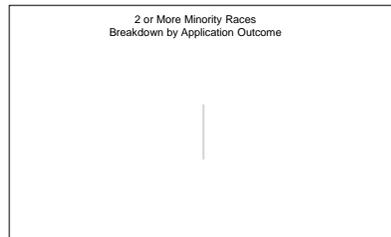
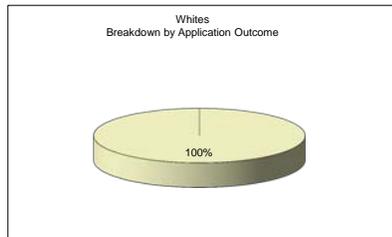
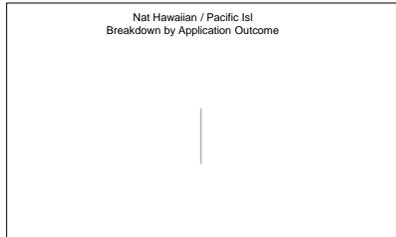
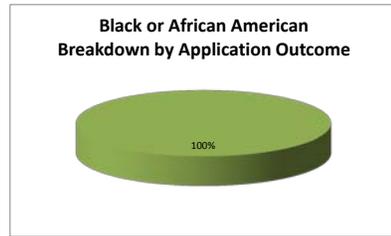
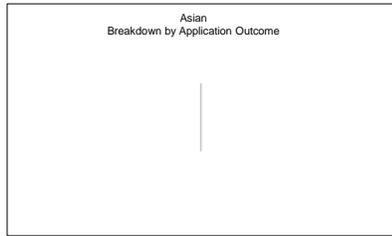
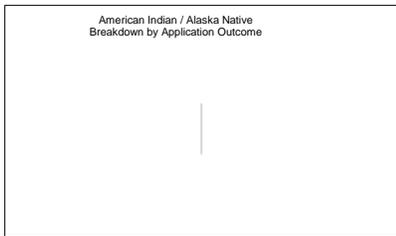
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	50%	0	0%	0	0%	1	100%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	50%	0	0%	0	0%	1	100%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	100%	0	0%	0	0%	2	100%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



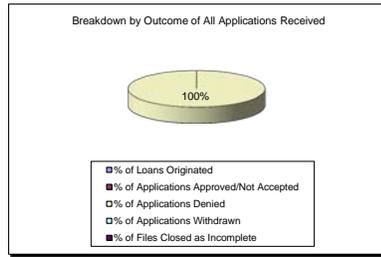
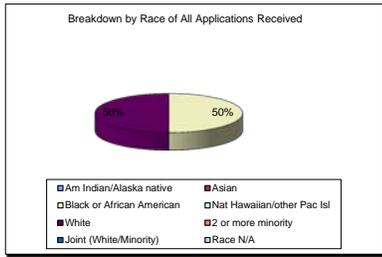
OneUnited Bank Low-Income Mortgage Lending

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2011

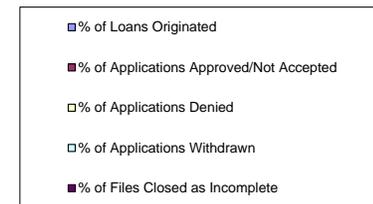
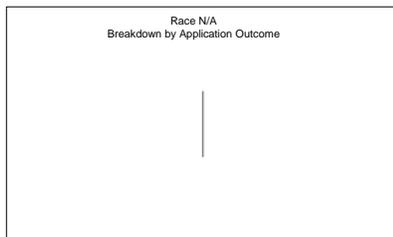
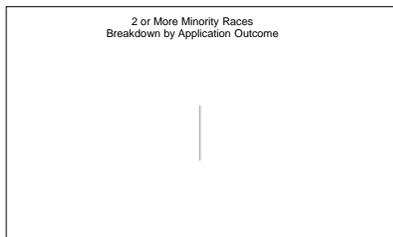
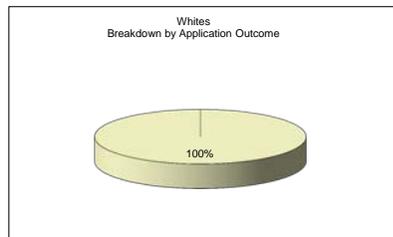
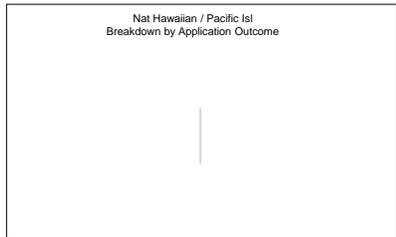
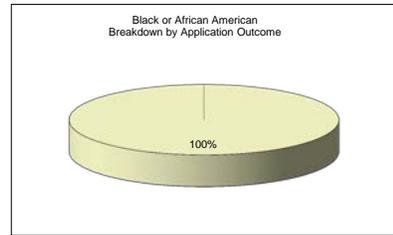
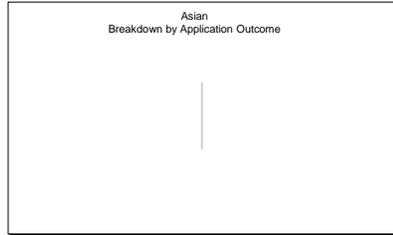
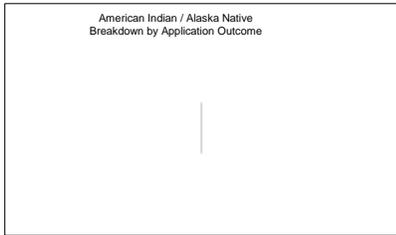
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Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	50%	0	0%	0	0%	1	100%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	50%	0	0%	0	0%	1	100%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	100%	0	0%	0	0%	2	100%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



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The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



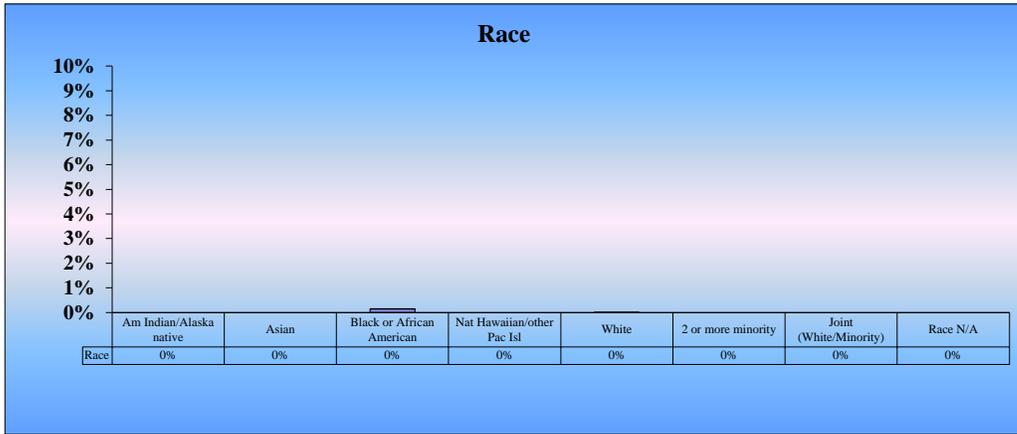
Compared against the MSA Aggregate Total

2011

OneUnited Bank HMDA Mortgage Lending

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	0%	0	0%	0	0%	1	1%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	0%	0	0%	0	0%	1	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	0%	0	0%	0	0%	2	0%	0	0%	0	0%

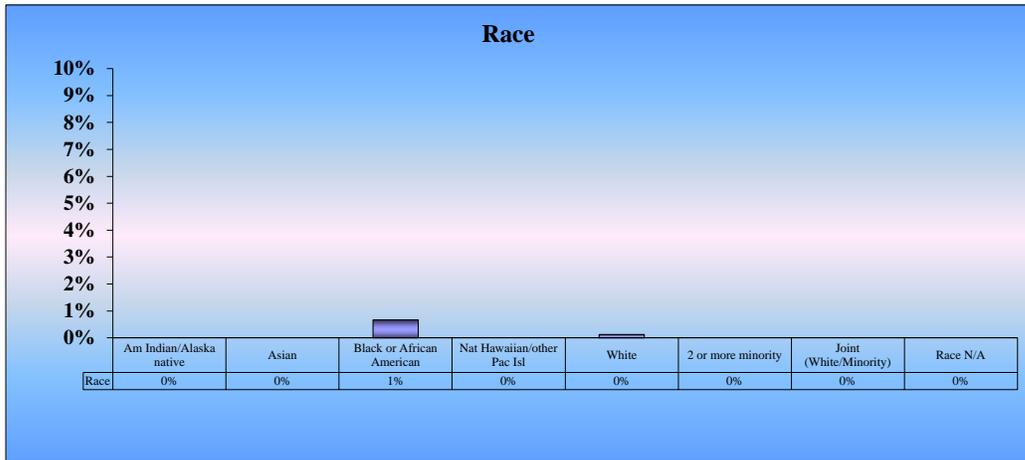
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



OneUnited Bank Low-Income Mortgage Lending

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	1%	0	0%	0	0%	1	2%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	0%	0	0%	0	0%	1	1%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	0%	0	0%	0	0%	2	1%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information



Sovereign Bank



824 North Market Street, Suite 100
Wilmington, DE 19801
267-256-8601

CRA Community Development Managing Director

John V. Killen
824 North Market Street, Suite 100
Wilmington, DE 19801
267-256-8601

Sovereign Bank Overview

Sovereign Bank
824 North Market Street, Suite 100
Wilmington, DE 19801

Description

Sovereign Bank is a \$78.1 billion federally chartered, stock savings bank headquartered in Wilmington, Delaware. Sovereign was acquired by Banco Santander, S.A. in January 2009. Banco Santander is the largest bank in the euro zone and among the largest in the world, with \$1.25 trillion in deposits and funds under management.

Sovereign Bank is one of the 25 largest banks in the United States, with principal markets in the northeast United States. The bank has 722 branches, 2,200 ATMs, 8,700 employees, and 1.7 million customers. Sovereign offers an extensive array of financial products and services to individuals, businesses, government/municipalities, and institutional entities. Many of the bank's loan products are designed to improve access to credit for low- and moderate-income borrowers.

Sovereign Bank's principal presence is in Connecticut, Delaware, Massachusetts, Maryland, New Hampshire, New Jersey, New York, Pennsylvania and Rhode Island. In 2011, the bank announced that it intends to move its corporate headquarters to Boston, and change its name to Santander Bank.

Principal Officers

President & CEO, Sovereign Bancorp

Jorge Morán
824 North Market Street, Suite 100
Wilmington, DE 19801
267-256-8601

CFO

Kirk W. Walters

Employees

Number of Employees	8,092 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	722
Branches in Boston	33
Number of ATMs	2,359
Number of Free-Standing ATMs	1,637

CRA Rating

Rating Agency	OTS
Most Recent Rating	2010
Overall Rating	OUTSTANDING ²
Lending Test Rating	OUTSTANDING
Investment Test Rating	HIGH SATISFACTORY
Service Test Rating	OUTSTANDING

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by OTS, published 2010.



Discussion

Overall rating: OUTSTANDING³

Lending Test

Lending Test Rating: OUTSTANDING⁴

General Responsiveness to Credit Needs

Sovereign Bank’s Lending Test rating is Outstanding. The bank extended a large volume of HMDA loans in its national footprint. Sovereign was ranked 8th in 2008 and 4th in 2009 in lending market share in the markets where the bank operates. Sovereign also extended a substantial volume of small business loans in its national assessment areas, despite competition from large commercial banks operating in many of the same markets.

The Boston MSA received 40% of the bank’s total HMDA lending 2008-2010, and 40% of Sovereign’s small business lending over the same period. Sovereign was the 4th leading mortgage originator in the Boston MSA in 2009, with 11,627 loans totaling \$2.7 billion; its 2010 lending volume was comparable.

Responsiveness to Low- and Moderate-Income Credit Needs

Sovereign’s overall lending to low- and moderate-income borrowers outperformed the aggregate by a substantial margin in 2008 and 2009, with a slight decline in 2010. Sovereign outperformed aggregate HMDA reporters in lending in low- and moderate-income geographies by a small margin in 2009 and 2010. The bank outperformed the aggregate lenders in small business lending in low- and moderate-income geographies by a substantial margin in 2008, 2009, and 2010.⁵

In Boston, Sovereign Bank also showed solid penetration into the low- and moderate-income borrower market. Sovereign’s Boston MSA lending to both low- and moderate-income

borrowers exceeded that of aggregate lenders by a good margin each year 2008-2010. In 2010, the bank originated 5.5% of loans to low-income borrowers, and 17.2% to moderate-income borrowers.⁶

These positive results are partially attributable to the bank’s extensive involvement in affordable mortgage products. Sovereign Bank is involved in most state housing agency programs, federal guaranteed/subsidized programs, and both internal and secondary market affordable mortgage programs.

For example, the bank provides technical assistance to sponsors of affordable housing projects in filing for grants from the Federal Home Loan Bank. In 2011, Sovereign Bank administered 137 Affordable Housing Program projects and submitted three applications for \$750,000.⁷

Leadership in Community Development Loans

Sovereign Bank provides a high level of community development lending across the bank’s national footprint. These loans provide or increase access to affordable housing for lower-income residents; services targeted to lower-income individuals and families; financing for small businesses; or economic development of distressed areas. In 2011, the bank provided a total of \$1.8 billion in community loans and investments, of which \$1.10 billion was allocated to affordable housing initiatives.⁸

Sovereign originated 297 community development loans providing over \$669.3 million in credit during the CRA review period, 2008-2010. This level of lending exceeded that of larger similarly situated banks. In Boston over the same period, the bank extended 49 community development loans totaling \$86.6 million.

Sovereign’s commitment to community development lending in Boston is strong. The Boston MSA is responsible for 40 percent of all Sovereign Bank’s HMDA reportable lending, 40

³ Based on most recent CRA Performance Evaluation by OTS published 2010.

⁴ Based on most recent CRA Performance Evaluation by OTS published 2010.

⁵ Based on most recent CRA Performance Evaluation by OTS published 2010.

⁶ Ibid.

⁷ Sovereign Bank Community Reinvestment Plan 2011-2013.

⁸ Sovereign Bank Community Reinvestment Plan 2011-2013.



percent of its reportable small business lending, and 36 percent of its branches.⁹

Innovative and Flexible Lending Practices

Sovereign Bank has a solid record of lending under a variety of innovative and flexible lending products that target residents and businesses most in need. The bank developed a number of innovative/flexible products in response to specific needs in various markets.¹⁰

The bank partners with Massachusetts Housing Partnership’s Soft Second program. In 2011, the bank provided over \$40 million in Soft Second low-cost mortgage loans to first-time homebuyers.¹¹

In 2010, Sovereign was recognized by Mass Housing as the top originator of Mass Housing home improvement loans.

Sovereign participates in a number of other loan programs that primarily serve credit needs other than strictly residential mortgage or small business. In Boston, these programs include the Massachusetts Home Front Loan Program, which provides affordable loans to members of the National Guard and Reserves mobilized for active duty, and the Massachusetts Assistive Technology Loan Program, which provides low-cost loans to people with disabilities to buy assistive technology devices and services.¹²

Investment Test

Investment Test Rating:

HIGH SATISFACTORY¹³

Sovereign’s Investment Test rating is High Satisfactory for its national activities, and Outstanding for its Boston MSA community development investment activities. In Boston,

Sovereign Bank originated a high level of community development loans during the review period, and has an exemplary record of lending under various innovative and flexible lending products that target residents and businesses most in need.¹⁴

During the period 2008-2010, Sovereign Bank extended \$65.4 million nation-wide in qualified traditional community-development investments through the purchase of \$17.0 million in low income housing tax credits (LIHTC) and \$48.4 million in new markets tax credits (NMTC). Of this \$65.4 million in qualified traditional community-development investments, \$22.5 million or 34.5% is directly allocated to the Boston MSA. The dollar level of traditional community-development activity compares favorably to Sovereign’s peers, and the nature of the traditional investments reflects a strong commitment to qualified community development investments in Boston.¹⁵

Community Development Grants and Donations

Sovereign Bank extended a substantial level of charitable donations for community development qualified activities. Qualified community-development donations totaled approximately \$7.5 million in 2009-2010.

The bank’s level of qualified community development activities in Massachusetts, however, was lower than expected, based on the distribution of overall lending levels and branch presence in the state.¹⁶

Contributions to qualified organizations in the Boston MSA totaled \$2.1 million over 2008-2010, or 15.2 percent of the bank’s total national contributions. This allocation of contributions reflects a reasonable effort in the Boston MSA. The recipients of these donations support a broad range of community development services including affordable housing development, residential facilities for low-income physically-

⁹ Ibid.

¹⁰ Based on most recent CRA Performance Evaluation by OTS published 2010.

¹¹ Sovereign Bank Community Reinvestment Plan 2011-2013.

¹² Based on most recent CRA Performance Evaluation by OTS published 2010.

¹³ Based on most recent CRA Performance Evaluation by OTS published 2010.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Based on most recent CRA Performance Evaluation by OTS published 2010.



challenged residents, food pantries, homeless services, and homeownership counseling.¹⁷

In Boston, Sovereign’s Community Development Contributions included donations to:

- Massachusetts Affordable Housing Alliance
- Neighborhood of Affordable Housing
- Urban Edge
- Habitat for Humanity
- Allston Brighton CDC
- Fenway CDC
- Massachusetts Housing Partnership

In 2011, the bank provided over \$2 million in charitable grants to organizations nationwide to promote community development, education, and health and human services. The bank made a \$4.8 million investment in a CRA-eligible security, backed by mortgage loans to low- and moderate-income borrowers.¹⁸

Service Test

Service Test Rating: **OUTSTANDING**¹⁹

Sovereign Bank’s Service Test rating is Outstanding.

Retail Services

Sovereign provides a broad range of traditional thrift deposit services and loan products targeted to consumers, businesses, and municipalities throughout its branch delivery system. A full menu of checking, savings, certificates of deposit, and retirement accounts are available throughout the Boston MSA through the bank’s extensive branch network and alternative access methods.²⁰

Banking offices feature various customer conveniences, including Saturday hours, speech

recognition ATMs, drive-up and walk-up windows, and night depositories. The services offered at each branch are generally consistent and do not vary in a way that would be inconvenient to residents of the assessment area. Alternate service and product delivery systems include online banking, bank-by-mail, and telephone banking.

Community Development Services

Sovereign Bank displayed strong performance in providing community development services in the Boston MSA. Sovereign Bank is actively involved with a number of community-development activities. These include assisting organizations involved in providing community services to low- and moderate-income individuals, affordable housing, and economic development of lower-income areas.²¹

During the review period, the bank displayed its responsiveness to community development needs by providing financial and technical assistance to development organizations in Boston. Sovereign has partnered with local organizations to focus on educational programs to improve financial literacy. The qualified community-development activities in which the bank participated include:

- The Earned Income Tax Credit program, providing tax and budgeting help to lower-income individuals
- Interest on Lawyers’ Trust Accounts program, providing legal assistance to needy individuals
- IDA and FSA accounts, designed to help lower-income individuals meet savings goals

The overall level of commitment shown by the bank in support of community-development activities by employee and officer involvement is excellent.²² In 2011, Sovereign employees contributed more than 46,000 volunteer hours to community service agencies and organizations.²³

¹⁷ Ibid.

¹⁸ Sovereign Bank Community Reinvestment Plan 2011-2013.

¹⁹ Based on most recent CRA Performance Evaluation by OTS published 2010.

²⁰ Ibid.

²¹ Based on most recent CRA Performance Evaluation by OTS published 2010.

²² Ibid.

²³ Sovereign Bank Community Reinvestment Plan 2011-2013.



Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB			
			1442 Dorchester Avenue	✓	✓
			Dorchester, MA 02122		
			30 Birmingham Parkway	✓	✓
			Brighton, MA 02135		
			415 Market Street	✓	✓
			Brighton, MA 02135		
			780 Gallivan Boulevard	✓	✓
			Dorchester, MA 02122		
			1617 Blue Hill Avenue	✓	✓
			Mattapan, MA 02126		
			1850 Centre Street	✓	✓
			West Roxbury, MA 02132		
			860 River Street	✓	✓
			Boston, MA 02136		
			FSB: Full Service Branch		
1 Beacon Street	✓	✓			
Boston, MA 02108					
75 State Street	✓	✓			
Boston, MA 02109					
30 Winter Street	✓	✓			
Boston, MA 02108					
75-101 Federal Street	✓	✓			
Boston, MA 02110					
125 Summer Street	✓	✓			
Boston, MA 02110					
100 Oliver Street	✓	✓			
Boston, MA 02110					
287 Hanover Street	✓	✓			
Boston, MA 02113					
61 Harrison Avenue	✓	✓			
Boston, MA 02111					
125 Causeway Street	✓	✓			
Boston, MA 02114					
67 Beacon Street	✓	✓			
Boston, MA 02108					
43 Kneeland Street	✓	✓			
Boston, MA 02111					
61 Arlington Street	✓	✓			
Boston, MA 02116					
575 Boylston Street	✓	✓			
Boston, MA 02116					
200 Seaport Boulevard	✓	✓			
Boston, MA 02210					
521 Tremont Street	✓	✓			
Boston, MA 02116					
800 Boylston Street	✓	✓			
Boston, MA 02199					
2 Meridian Street East	✓	✓			
Boston, MA 02128					
279 Massachusetts Avenue	✓	✓			
Boston, MA 02115					
437 Rutherford Avenue	✓	✓			
Boston, MA 02129					
474 West Broadway	✓	✓			
South Boston, MA 02127					
552 Commonwealth Avenue	✓	✓			
Boston, MA 02215					
2 Morrissey Boulevard	✓	✓			
Dorchester, MA 02125					
6 Francis Street	✓	✓			
Boston, MA 02115					
585 Columbia Road	✓	✓			
Dorchester, MA 02125					
330 Martin Luther King Blvd., Suite 45	✓	✓			
Roxbury, MA 02119					
3060 Washington Street	✓	✓			
Boston, MA 02119					



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Sovereign Bank's HMDA applications and originations both decreased significantly in 2011, in keeping with a pattern of general decline since 2007. Between 2010 and 2011, HMDA applications and originations both dropped 26%.

The bank's low-income lending fell by more than half between 2009 and 2011.²⁴

	2009	2010	2011
HMDA Applications Received	622	605	447
HMDA Loans Originated	442	446	330
Low-Income Applications Received	82	53	56
Low-Income Loans Originated	63	26	28

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	1.5%	2.5%	2.6%
Moderate	1.0%	2.0%	2.0%
Middle	1.0%	1.9%	1.6%
Upper	0.8%	1.5%	1.3%
Total	1.0%	1.9%	1.8%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	3.6%	7.1%	8.1%
Moderate	4.2%	8.0%	8.8%
Middle	4.0%	6.4%	6.9%
Upper	2.4%	5.1%	5.9%
Total	3.5%	6.6%	7.3%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Sovereign Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

²⁴ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.





Source Documents

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; September 28, 2010.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

Banco Santander Annual Report 2011.

Sovereign Bank Community Reinvestment Plan 2011-2013.

FDIC Institution Directory:

<http://www2.fdic.gov/idasp>

Sovereign Bank website:

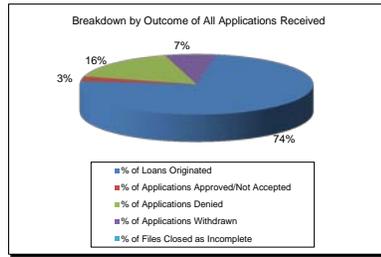
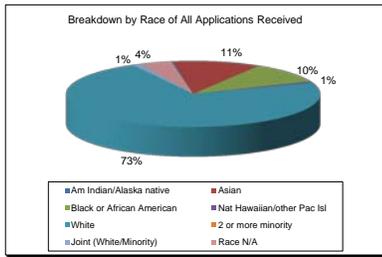
<http://www.sovereignbank.com/>

Sovereign Bank HMDA Mortgage Information

2011

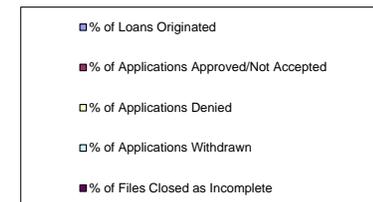
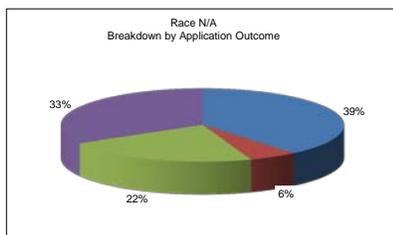
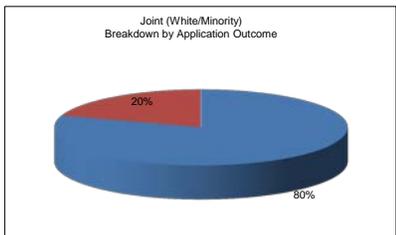
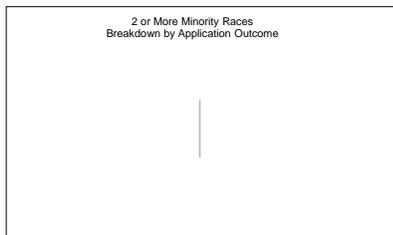
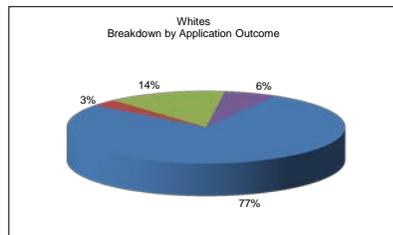
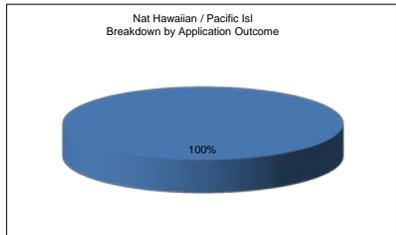
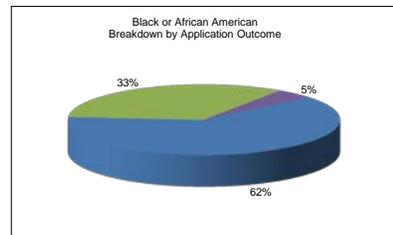
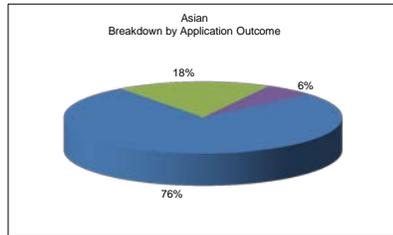
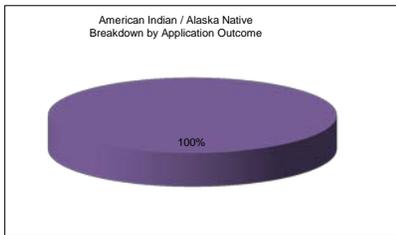
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	1	0%	0	0%	0	0%	0	0%	1	100%	0	0%
Asian	50	11%	38	76%	0	0%	9	18%	3	6%	0	0%
Black or African American	45	10%	28	62%	0	0%	15	33%	2	4%	0	0%
Nat Hawaiian/other Pac Isl	3	1%	3	100%	0	0%	0	0%	0	0%	0	0%
White	325	73%	250	77%	10	3%	45	14%	20	6%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	5	1%	4	80%	1	20%	0	0%	0	0%	0	0%
Race N/A	18	4%	7	39%	1	6%	4	22%	6	33%	0	0%
Total	447	100%	330	74%	12	3%	73	16%	32	7%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

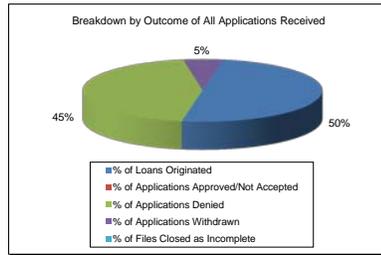
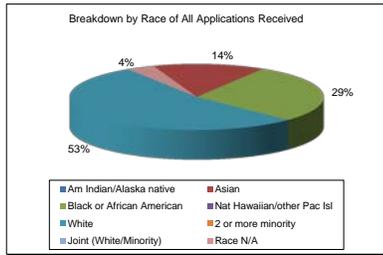


Sovereign Bank Low-Income Mortgage Information

2011

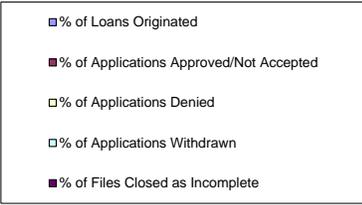
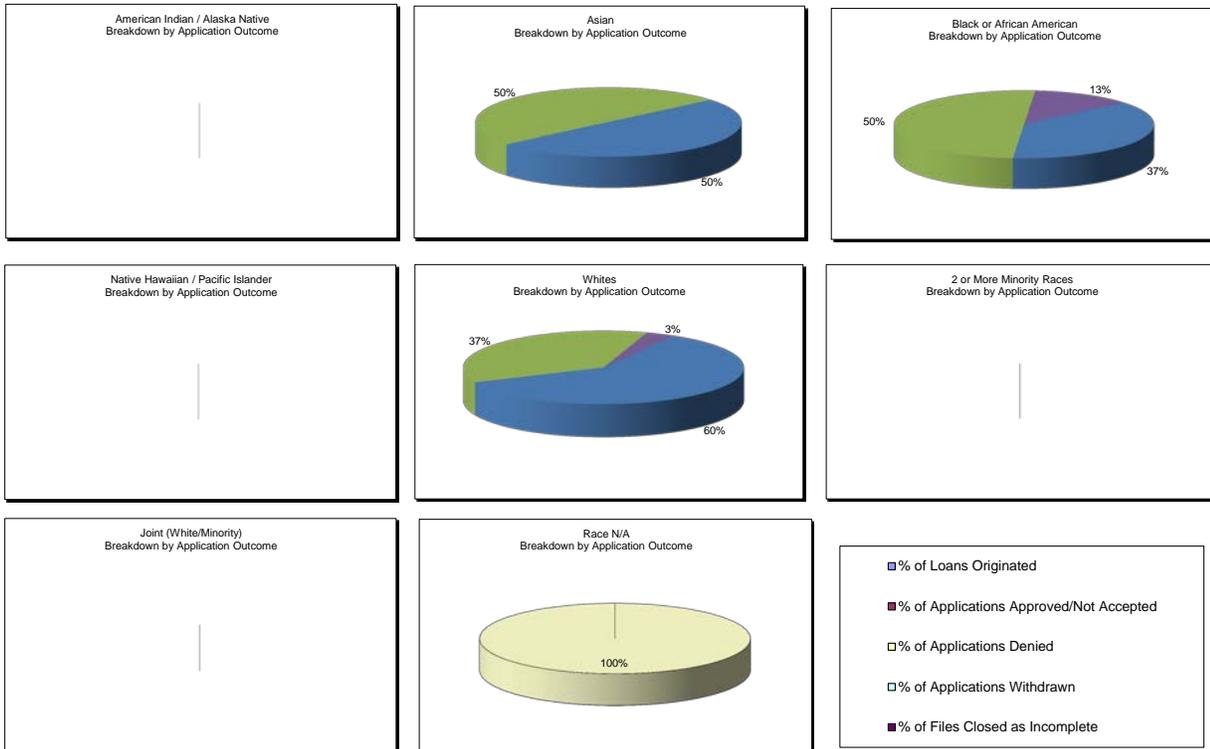
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	8	14%	4	50%	0	0%	4	50%	0	0%	0	0%
Black or African American	16	29%	6	38%	0	0%	8	50%	2	13%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	30	54%	18	60%	0	0%	11	37%	1	3%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	4%	0	0%	0	0%	2	100%	0	0%	0	0%
Total	56	100%	28	50%	0	0%	25	45%	3	5%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



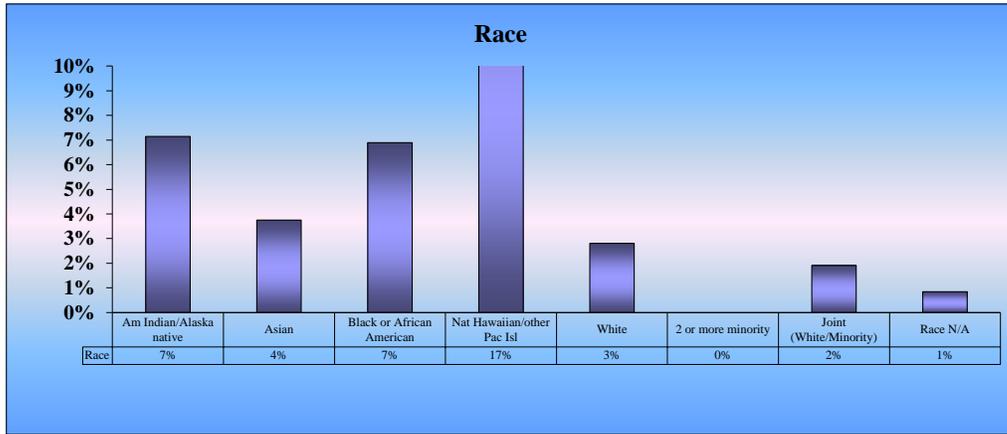
Compared against the MSA Aggregate Total

2011

Sovereign Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	1	7%	0	0%	0	0%	0	0%	1	100%	0	0%
Asian	50	4%	38	4%	0	0%	9	4%	3	2%	0	0%
Black or African American	45	7%	28	8%	0	0%	15	10%	2	3%	0	0%
Nat Hawaiian/other Pac Isl	3	17%	3	19%	0	0%	0	0%	0	0%	0	0%
White	325	3%	250	3%	10	2%	45	4%	20	2%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	5	2%	4	2%	1	7%	0	0%	0	0%	0	0%
Race N/A	18	1%	7	0%	1	1%	4	2%	6	2%	0	0%
Total	447	3%	330	3%	12	2%	73	4%	32	2%	0	0%

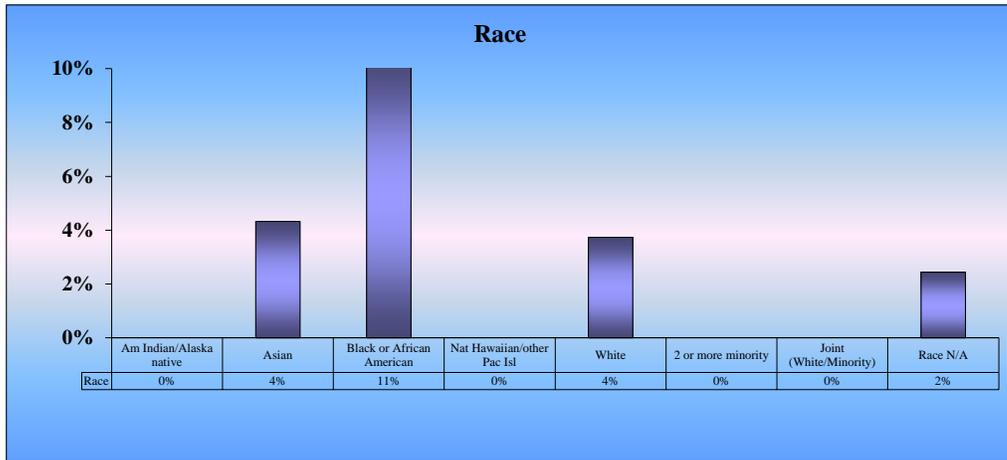
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Sovereign Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	8	4%	4	3%	0	0%	4	8%	0	0%	0	0%
Black or African American	16	11%	6	9%	0	0%	8	13%	2	13%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	30	4%	18	4%	0	0%	11	6%	1	1%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	2%	0	0%	0	0%	2	5%	0	0%	0	0%
Total	56	5%	28	4%	0	0%	25	8%	3	3%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information

No data available





TD Bank



Bank

America's Most Convenient Bank®

416-982-8222

TD Bank Overview

TD Bank, N.A.
2035 Limestone Road
Wilmington, DE 19808

Description

TD Bank, N.A. is a \$189 billion national bank headquartered in Wilmington, Delaware. The bank is a wholly owned subsidiary of the Toronto-Dominion Bank of Toronto, Canada, which is listed on the New York Stock Exchange and is among the biggest financial services companies in North America.

TD Bank, N.A. is one of the 10 largest banks in the U.S., with more than 25,000 employees and 7 million customers. The bank operates over 1,200 retail branches in 17 states.

TD Bank offers banking services and products to individuals, business and governments including commercial and consumer services. Through its Wealth Management Group division, it provides trust and investment management services. TD Bank also operates divisions in government banking, mortgage banking, private banking, asset-based lending and merchant services.

Principal Officers

President & CEO

Bharat B. Masrani
2035 Limestone Road
Wilmington, DE 19808
416-982-8222

CFO

Colleen Johnston
2035 Limestone Road
Wilmington, DE 19808
416-982-8222

Regional President, Connecticut, Massachusetts, and Rhode Island

Mark Crandall
2035 Limestone Road
Wilmington, DE 19808

Employees

Number of Employees	25,680 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	1281
Branches in Boston	7
Number of ATMs in Boston	17
Number of Free-Standing ATMs in Boston	10

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2008
Overall Rating for Boston MSA	OUTSTANDING²
Lending Test Rating for Boston MSA	OUTSTANDING
Investment Test Rating for Boston MSA	HIGH
Service Test Rating for Boston MSA	HIGH
	SATISFACTORY
	SATISFACTORY

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by OCC published 2008.



Discussion

**Overall Rating for Boston MSA:
OUTSTANDING³**

The OCC evaluated both TD Bank’s nationwide activities, and its specific performance in the Boston MSA.

Nationwide, the bank’s rating were identical to its Boston MSA ratings: the bank received a rating of “OUTSTANDING” overall and for its Lending Test, and its Investment and Service Tests were rated “HIGH SATISFACTORY.” The discussion below focuses on the Boston MSA results.

Lending Test

**Lending Test Rating for Boston MSA:
OUTSTANDING⁴**

General Responsiveness to Credit Needs

TD Bank’s performance under the lending test in the Boston MSA is rated “Outstanding”.

The bank’s level of lending activity is considered adequate, considering the bank’s history of growth through small acquisitions in Boston, and considering the strong competition for all types of loans in this marketplace. TD Bank achieved excellent geographic distribution of all mortgage loan products across low- and moderate-income geographies.⁵

TD Bank’s solid performance in originating small business loans when compared to its local bank competitors further supports this conclusion. TD Bank consistently ranks among the top Massachusetts SBA Lenders.⁶

Responsiveness to Low- and Moderate-Income Credit Needs

TD Bank’s distribution of home mortgage loans by income level of borrower is excellent. The

bank’s distribution of home purchase and home refinance loans to moderate-income borrowers significantly exceeds the area demographics. Although the rate of lending to low-income borrowers is below Boston-area demographics, this is not surprising given the inability of many low-income borrowers to qualify for home mortgages in this high-cost area.⁷

Among area banks, TD Bank ranked 7th with respect to overall home mortgage lending, but ranked 5th among low- and moderate-income borrowers. This performance reflects the bank’s particular responsiveness to low- and moderate-income credit needs.

The geographic distribution of home purchase loans by income level of geography is excellent, exceeding the area’s demographics in each loan category. This performance is particularly exceptional in a high-cost area like Boston.⁸

Leadership in Community Development Loans

TD Bank has very strong record of making responsive community development loans in the Boston MSA.

For the CRA exam period (2005-2007), TD Bank provided 45 community development loans totaling over \$85 million, providing over 1,100 units of affordable housing.⁹ These loans ranged from infrastructure, acquisition, and/or construction loans, lines of credit for community development corporations, and financing for affordable housing. Many of the bank’s construction loans supported Chapter 40B affordable housing construction, which allows developers to supersede certain community zoning restrictions if the development has affordable housing set-asides.

TD Bank’s primary community development lending partners in Boston include the Massachusetts Housing Investment Corporation, Massachusetts Housing Partnership Fund, and The Housing Partnership.¹⁰

³ Based on most recent CRA Performance Evaluation by OCC published 2008.

⁴ Based on most recent CRA Performance Evaluation by OCC published 2008.

⁵ Ibid.

⁶ U.S. Small Business Association website; Boston Globe, “Eastern Bank is top SBA lender in Mass,” October 13, 2010.

⁷ Based on most recent CRA Performance Evaluation by OCC published 2008.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid.



In 2009, TD Bank made commitments totaling \$362 million for community development loans and investments in support of the development, maintenance, and preservation of affordable housing.¹¹ Over the period 2008-2010, the bank originated 113 community development loans nation-wide, representing over \$423 million in funding to help build nearly 4,000 new homes or apartments.¹²

In 2011, TD Bank originated 52 community development loans totaling \$294 million, which helped build or preserve nearly 1,500 new units of affordable housing.¹³

Innovative or Flexible Lending Practices

TD Bank participated in Massachusetts Housing Partnership’s Soft Second Loan Program, a program for first-time homebuyers providing below market interest rates, low down-payment requirements, no points, reduced closing costs, and waiver of mortgage insurance.¹⁴

TD Bank, with four other banks, partnered with the Federal Reserve Bank of Boston to establish the Mortgage Relief Fund—one of the first pools set up to assist homeowners to refinance their subprime mortgages into a conventional product.

Investment Test

Investment Test Rating for Boston
MSA: HIGH SATISFACTORY¹⁵

TD Bank’s performance under the investment test in the Boston MSA is rated “High Satisfactory.” The bank made a good level of community development investments responsive to identified credit needs.¹⁶

Nearly all of the bank’s investments and grants are associated with affordable housing for low- and moderate-income individuals as well as economic development, which showed excellent

responsiveness to local needs.

In 2011, the bank invested \$296 million in low-income housing tax credits to support 36 housing projects for families, individuals, and elderly residents.¹⁷

The TD Bank Charitable Foundation is the charitable giving arm of TD Bank. All CRA-qualified grants are issued through the Foundation. The Foundation’s activities focus on affordable housing, education and financial literacy, and the environment. In 2011, the Foundation contributed more than \$13 million to local community initiatives to help meet the needs of low- and moderate- income individuals, neighborhoods, and small businesses.¹⁸

Beginning in 2006, the TD Bank Charitable Foundation has sponsored an annual “Housing for Everyone” grant competition. Through this competition, the foundation has awarded nearly \$10 million in donations to non-profits to help provide safe, affordable housing in the U.S.¹⁹

TD Bank Charitable Foundation’s *Non-Profit Training Resource Fund* was launched in December 2007. This unique program awards \$100 thousand annually to non-profit organizations with funding for educational, training, and learning opportunities for their employees. Eligible organizations must be a 501(c)(3) and have a focus of either affordable housing or small-business economic development.²⁰ Between 2008 and 2010, the bank made 290 grants totaling \$252,000 through the program.²¹

¹¹ TD Bank website.

¹² TD Bank 2010 United States Corporate Responsibility Snapshot.

¹³ TD Bank 2011 United States Corporate Responsibility Snapshot.

¹⁴ Based on most recent CRA Performance Evaluation by OCC published 2008.

¹⁵ Based on most recent CRA Performance Evaluation by OCC published 2008.

¹⁶ Ibid.

¹⁷ TD Bank 2011 United States Corporate Responsibility Snapshot.

¹⁸ TD Bank website.

¹⁹ TD Bank 2011 United States Corporate Responsibility Snapshot.

²⁰ Based on most recent CRA Performance Evaluation by OCC published 2008.

²¹ TD Bank 2010 United States Corporate Responsibility Snapshot.



Service Test

Service Test Rating for Boston MSA:
HIGH SATISFACTORY²²

The bank’s performance under the service test in the Boston MSA is rated “High Satisfactory.”²³

Description of Service-Delivery Systems

TD Bank's delivery systems are reasonably accessible to geographies and individuals of different income levels. The hours and services offered throughout the Boston MSA are good. Services offered are comparable among locations regardless of the income level of the geography. Nearly all branch offices offered extended hours on various days of the week including Saturday hours.²⁴ All of TD Bank’s ATMs in North America are Braille-enabled and wheelchair accessible.²⁵

Community Development Services

TD Bank provides an excellent level of community development services, which contribute to its overall service test rating.²⁶

TD Bank has demonstrated a commitment to proactively providing financial expertise to homebuyers and small businesses, and to providing financial services to community development partners.

In 2010, TD Bank participated in 256 homebuyer mortgage seminars, with 4,000 participants learning about applying for a mortgage, the loan closing process and post-purchase maintenance to protect their housing investment.²⁷

TD Bank’s primary community development service partners in the Boston MSA were Lawrence CommunityWorks, SCORE, The Housing Partnership, Gloucester Housing

Authority, Merrimack Valley Housing Partnership and the Salem Harbor CDC.²⁸

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1 Union Street Boston, MA 02108	✓	✓
24 Winter Street Boston, MA 02108	✓	✓
185 Franklin Street Boston, MA 02110	✓	✓
535 Boylston Street Boston, MA 02116	✓	✓
1228-1230 Commonwealth Avenue Allston, MA 02134	✓	✓
391 Market Street Brighton, MA 02135	✓	✓
1833 Centre Street West Roxbury, MA 02132	✓	✓
One Merrimac Street Boston, MA 02114	✓	
126 Causeway Street (North Station - Gate 10 Left) Boston, MA 02114	✓	
126 Causeway Street (North Station - Gate 10 Right) Boston, MA 02114	✓	
126 Causeway Street (North Station - West) Boston, MA 02114	✓	
126 Causeway Street (North Station - East) Boston, MA 02114	✓	
100 Legends Way (TD Garden) Boston, MA 02114	✓	
Airport Access Rd. & Porter St. (MBTA/Logan Airport- Ticketing) Boston, MA 02128	✓	
Airport Access Rd. & Porter St. (MBTA/Logan Airport-Brick Wall)	✓	

²² Based on most recent CRA Performance Evaluation by OCC published 2008.

²³ Ibid.

²⁴ Ibid.

²⁵ TD Bank 2011 United States Corporate Responsibility Snapshot.

²⁶ Based on most recent CRA Performance Evaluation by OCC published 2008.

²⁷ TD Bank 2010 United States Corporate Responsibility Snapshot.

²⁸ Based on most recent CRA Performance Evaluation by OCC published 2008.



Boston, MA 02128
 Airport Access Rd. & Porter St. ✓
 (MBTA/Logan Airport-Cross Tracks)
 Boston, MA 02128
 200 Terminal Road ✓
 East Boston, MA 02128
 FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

TD Bank originated a high volume of HMDA-reportable mortgage loans in 2009 through 2011, though both applications received and loans originated both declined year over year. Its low-income HMDA lending levels were very low, but in keeping with the number of applications received.²⁹

	2009	2010	2011
HMDA Applications Received	233	199	189
HMDA Loans Originated	135	115	110
Low-Income Applications Received	10	11	11
Low-Income Loans Originated	4	3	3

Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	1.7%	1.2%	1.3%
Moderate	1.6%	1.3%	1.0%
Middle	1.2%	0.5%	0.8%
Upper	1.1%	0.9%	1.0%
Total	1.4%	1.0%	1.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	4.7%	2.9%	3.4%
Moderate	4.9%	3.1%	2.0%
Middle	3.7%	0.8%	4.0%

²⁹ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Upper	3.0%	1.3%	2.3%
Total	4.0%	2.0%	2.9%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for TD Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency, December 8, 2008.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

TD Bank Annual Reports, 2010 and 2011.

TD Bank 2011 United States Corporate Responsibility Report.

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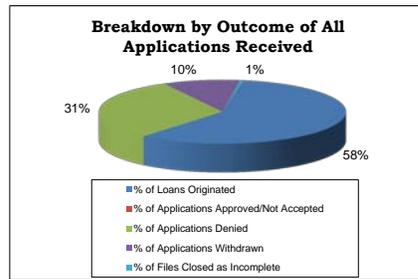
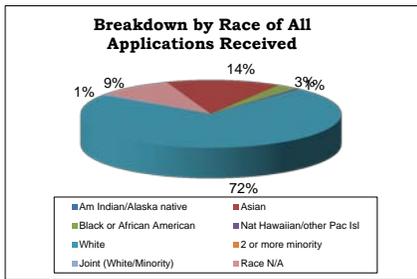
<http://www.td.com/>

TD Bank HMDA Mortgage Lending

2011

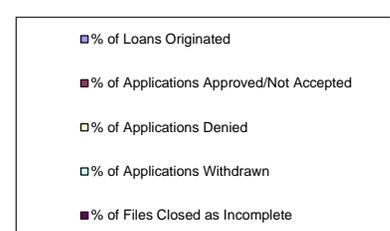
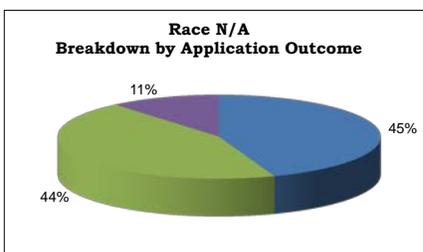
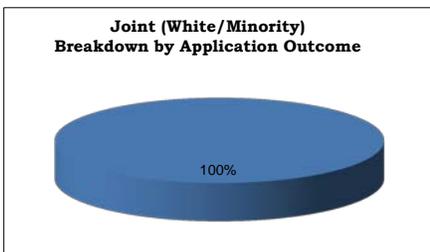
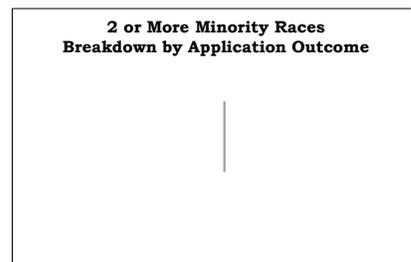
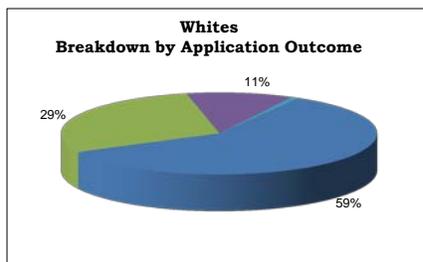
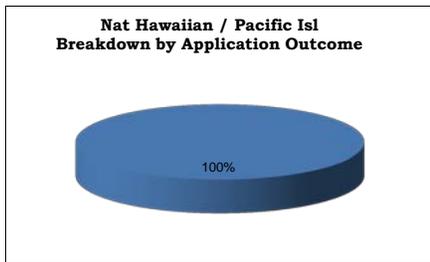
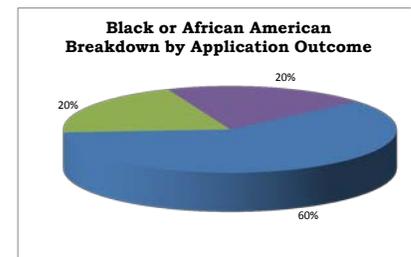
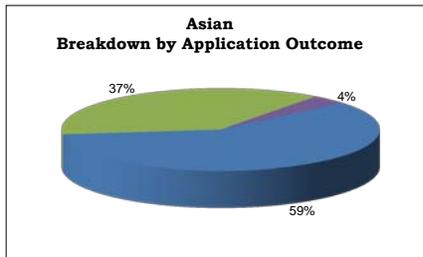
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	27	14%	16	59%	0	0%	10	37%	1	4%	0	0%
Black or African American	5	3%	3	60%	0	0%	1	20%	1	20%	0	0%
Nat Hawaiian/other Pac Isl	1	1%	1	100%	0	0%	0	0%	0	0%	0	0%
White	137	72%	81	59%	0	0%	40	29%	15	11%	1	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	1%	1	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	18	10%	8	44%	0	0%	8	44%	2	11%	0	0%
Total	189	100%	110	58%	0	0%	59	31%	19	10%	1	1%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

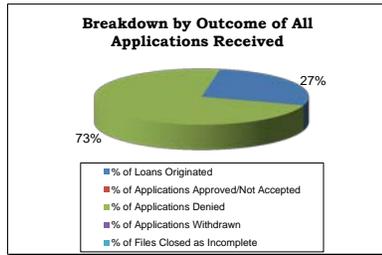
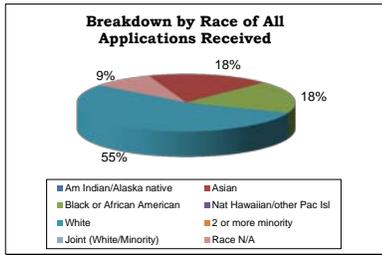


TD Bank Low-Income Mortgage Lending

2011

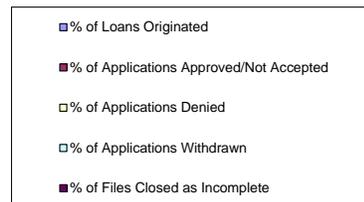
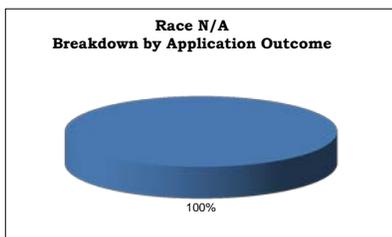
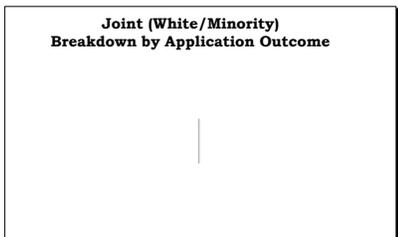
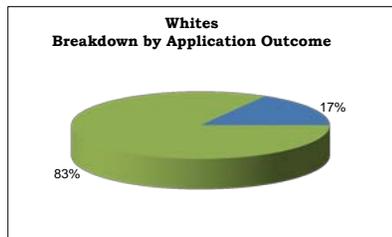
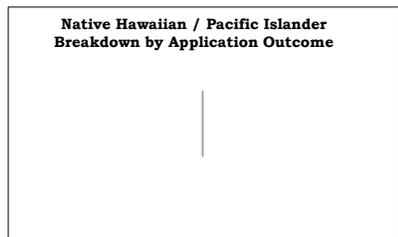
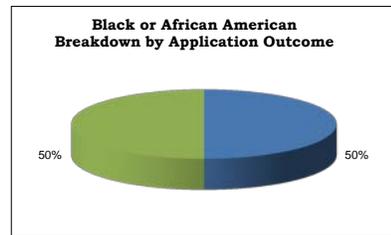
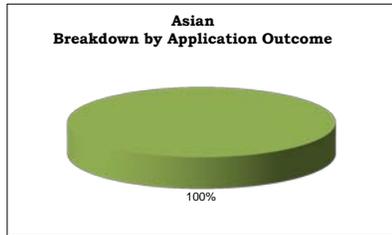
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	18%	0	0%	0	0%	2	100%	0	0%	0	0%
Black or African American	2	18%	1	50%	0	0%	1	50%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	6	55%	1	17%	0	0%	5	83%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	9%	1	100%	0	0%	0	0%	0	0%	0	0%
Total	11	100%	3	27%	0	0%	8	73%	0	0%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



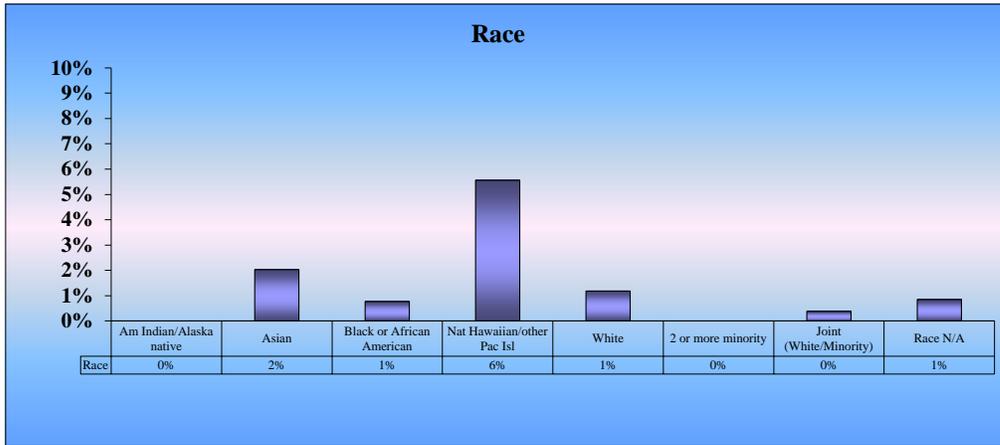
Compared against the MSA Aggregate Total

2011

TD Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	27	2%	16	2%	0	0%	10	5%	1	1%	0	0%
Black or African American	5	1%	3	1%	0	0%	1	1%	1	1%	0	0%
Nat Hawaiian/other Pac Isl	1	6%	1	6%	0	0%	0	0%	0	0%	0	0%
White	137	1%	81	1%	0	0%	40	4%	15	1%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	0%	1	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	18	1%	8	1%	0	0%	8	3%	2	1%	0	0%
Total	189	1%	110	1%	0	0%	59	3%	19	1%	1	0%

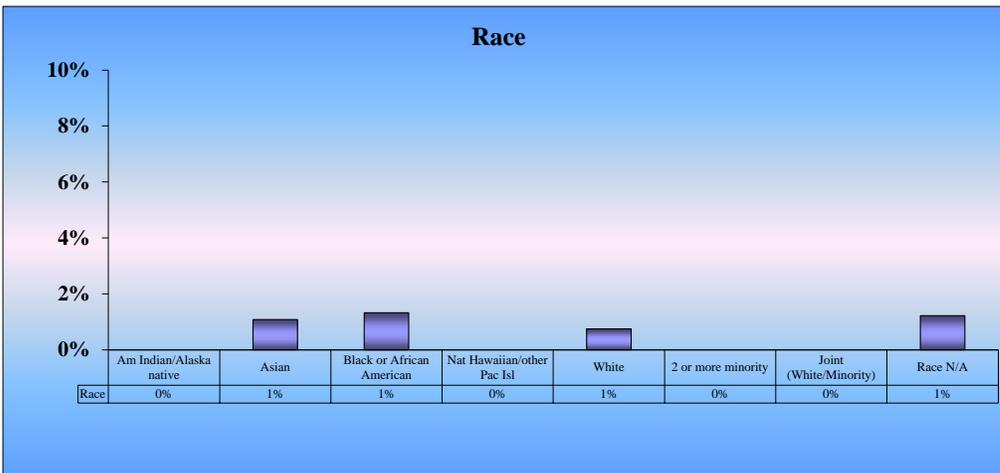
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



TD Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	1%	0	0%	0	0%	2	4%	0	0%	0	0%
Black or African American	2	1%	1	2%	0	0%	1	2%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	6	1%	1	0%	0	0%	5	3%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	1%	1	3%	0	0%	0	0%	0	0%	0	0%
Total	11	1%	3	0%	0	0%	8	2%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information



Webster Bank



Regional President, Massachusetts and Rhode Island

Bob Twomey
 Webster Plaza
 Waterbury, CT 06702
 800-325-2424

Webster Bank Overview

Webster Bank, N.A.
 Webster Plaza
 Waterbury, CT 06702

Description

Webster Bank, N.A., is a nationally chartered, \$18.7 billion bank headquartered in Waterbury, Connecticut. The bank is the principal subsidiary of Webster Financial Corporation, Inc., a bank holding company organized under the laws of Delaware.

Webster operates 168 branches and 473 ATMs in Connecticut, Rhode Island, Massachusetts, and New York. The vast majority (84%) of the bank's deposits are from the bank's Connecticut offices. About two percent of Webster Bank's total deposits are from its Massachusetts offices.

Webster Bank's business strategy is focused on retail lending, with more than half the bank's loan portfolio secured by 1-4 family residential loans. The bank emphasizes comprehensive full-service relationships and quality of service. The bank's customer base is primarily comprised of individual depositors and borrowers.

In December 2009, the bank opened a flagship office in Boston's Financial District.

Principal Officers

Chairman and CEO

James C. Smith
 Webster Plaza
 Waterbury, CT 06702
 800-325-2424

CFO

Glenn I. MacInnes
 Webster Plaza
 Waterbury, CT 06702
 800-325-2424

Employees

Number of Employees	2,785 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	168
Branches in Boston	1
Number of ATMs - Total	473
Free-Standing ATMs	305

CRA Rating

Rating Agency	OCC
Most Recent Rating	2011
Overall Rating for Massachusetts	OUTSTANDING ²
Lending Test Rating for Massachusetts	HIGH SATISFACTORY
Investment Test Rating for Massachusetts	OUTSTANDING
Service Test Rating for Massachusetts	OUTSTANDING

¹ FDIC Institution Directory.

² Based on most recent CRA Performance Evaluation by OCC published 2011.



Discussion

Overall rating for Massachusetts: OUTSTANDING³

The OCC evaluated both Webster Bank’s nationwide activities, and its specific performance in Massachusetts.

The bank’s Massachusetts performance ratings were higher than its overall performance ratings. Overall, Webster Bank received a rating of “SATISFACTORY.” Its Lending Test, Investment Test, and Service Test were all rated “HIGH SATISFACTORY.” The discussion below focuses on the bank’s Massachusetts CRA ratings.

Lending Test

Lending Test Rating for Massachusetts: HIGH SATISFACTORY⁴

Webster Bank’s performance under the Lending Test in Massachusetts is rated “High Satisfactory.” The bank’s Boston-area lending performance is considered good.

General Responsiveness to Credit Needs

Webster Bank’s lending levels reflect adequate responsiveness to the credit needs of its Massachusetts assessment areas. In Boston, Webster Bank’s overall lending activity is considered adequate for both home mortgages and small business lending.⁵

Webster Bank’s Massachusetts market share and rank (0.7% of deposits, or 30th in Massachusetts) is much higher than its share and rank of home mortgage lending (0.2% percent, or 93rd). However, this is considered adequate given the intense competition and high cost of housing in Massachusetts.

Webster Bank is committed to assisting qualified borrowers who have a verified financial

hardship. The bank has implemented the “Loss Mitigation Program” to assist homeowners with Webster-owned mortgages or home equity lines of credit avert foreclosure. The Loss Mitigation Program helps borrowers in the early stages of delinquency to identify sustainable alternatives to foreclosure. Mortgage assistance is focused on creating affordable, sustainable payment plans. Webster Bank’s mortgage assistance programs were designed with input from community and housing organizations.⁶

Responsiveness to Low- and Moderate-Income Credit Needs

Webster Bank achieved excellent distribution of home mortgage loans and small business loans in low- and moderate-income geographies.⁷

In Boston, the bank’s geographic distribution of home mortgage loans reflects excellent penetration throughout the assessment area. The percentage of home purchase loans that Webster Bank made in low- and moderate-income geographies significantly exceeds the percentage of owner occupied units.

The bank also achieved a good distribution of home mortgage loans among low- and moderate-income borrowers. The percentage of home purchase loans Webster Bank made to low-income individuals in Boston is significantly lower than the percentage of low-income families, but is considered adequate based on the lending environment in Boston. The percentage of home purchase loans made to moderate-income individuals exceeds the percentage of such families.⁸

Webster Bank also has an excellent record of lending to small businesses in Boston’s low- and moderate-income geographies.

Leadership in Community Development Loans

Webster did not originate any community development loans in Massachusetts during this CRA evaluation period (2007-2010).

³ Based on most recent CRA Performance Evaluation by OCC published 2011.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.



Innovative or Flexible Lending Practices

Webster offers several flexible HMDA loan programs to low- and moderate-income borrowers.

The 30 HOPE loan program and the My Community Mortgage program are flexible based upon bank-specific terms and conditions. In the Boston assessment area, Webster originated 12 loans, totaling \$2.6 million, under these programs.

Webster participates in other HMDA loan programs that are flexible based upon national or state-designed underwriting criteria. In Boston, the bank made 21 loans totaling \$5.1 million under such programs, demonstrating its dedication to meeting the needs of low- and moderate-income borrowers.⁹

Investment Test

Investment Test Rating for Massachusetts: OUTSTANDING¹⁰

The bank’s performance under the investment test in the State of Massachusetts is rated Outstanding. Webster Bank’s level of qualified investments reflects excellent responsiveness to the state’s credit and community development needs.¹¹

Webster Bank’s investment performance in Boston is excellent. The bank has an excellent level of qualified investments in the Boston assessment area. Total investments consist primarily of one mortgage-backed security for \$2,430,855 consisting of loans made to low- and moderate-income borrowers residing in Boston. Investments of this nature help meet community needs by providing liquidity to lenders so that more loans to lower-income borrowers can be originated.¹²

The remaining investments consist of \$42,600 in grants and donations. These grants and

donations support the needs of low- and moderate-income residents of Boston, including: affordable housing, community services, economic development, and neighborhood revitalization and stabilization.

Service Test

Service Test Rating for Massachusetts: OUTSTANDING¹³

Webster Bank’s performance under the Service Test in the State of Massachusetts is rated “Outstanding.” The bank’s performance in Boston is also considered excellent.

Description of Service-Delivery Systems

Webster Bank’s service delivery systems are readily accessible to geographies and individuals of different income levels. The bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems.

Webster Bank’s branches offer adequate hours and services throughout the assessment area. However, the average opening hours of the bank’s branches in low- to moderate-income geographies are lower than average middle/upper income branch location hours.¹⁴

Bank employees speak 32 different languages, and the bank has implemented a company-wide plan to have bilingual (Spanish and other languages) employees at every branch location to serve the local demographic.

Webster Bank’s alternative delivery systems also include online and telephone banking.

Community Development Services

Webster Bank’s performance in providing community development services in Boston is good.¹⁵

Webster Bank employees conducted five financial literacy seminars during the evaluation period, which reached 39 attendees in the Boston

⁹ Ibid.

¹⁰ Based on most recent CRA Performance Evaluation by OCC published 2011.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.



area. In addition, the bank provided funding and staff to support foreclosure prevention programs that served low- and moderate-income geographies. These efforts helped stabilize those geographies.

Webster’s Opportunity Checking Account product was introduced in 2008 to meet the needs of un-banked consumers who are ineligible to open regular checking accounts. The account offers access to regular banking services such as direct deposit, check writing, ATM cards, and online. The percentage of Opportunity Checking customers in Boston-area lower-income geographies very significantly exceeds the percentage of the population residing in these geographies, demonstrating the positive impact of this product to customers residing in low- and moderate-income geographies.¹⁶

To help meet the needs of lower-income families, Webster began waiving ATM access fees for state assistance Electronic Benefits Transfer (EBT) cards at Webster-owned ATMs in 2010. Service fees are waived regardless of whether the cardholder is a Webster Bank customer. By enabling EBT cardholders to access their funds free of charge, Webster Bank helps them save money that can then be used for the purposes intended by the state assistance programs. In 2010, Webster waived \$63,127 in fees for 21,399 EBT cardholders in the Massachusetts.¹⁷

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
100 Franklin Street Boston, MA 02110	✓	✓

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Webster Bank’s HMDA lending increased nearly fivefold 2009 to 2011, from 8 loans to 37 loans. The bank’s level of low-income HMDA lending remained low.¹⁸

	2009	2010	2011
HMDA Applications Received	14	26	52
HMDA Loans Originated	8	15	37
Low-Income Applications Received	5	3	2
Low-Income Loans Originated	3	1	1

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Small Business Loans

Below is a year-over-year comparison of small business lending by both number of loans originated and dollar amount as a percentage of all loans within the MSA.

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2009	2010	2011
Low	0.0%	0.1%	0.1%
Moderate	0.0%	0.0%	0.0%
Middle	0.1%	0.0%	0.0%
Upper	0.0%	0.1%	0.2%
Total	0.0%	0.0%	0.1%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2009	2010	2011
Low	0.0%	1.1%	0.8%
Moderate	0.0%	0.0%	0.0%
Middle	2.1%	0.0%	0.0%
Upper	0.0%	0.5%	0.9%
Total	0.4%	0.4%	0.5%

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Webster Bank in the year 2011 is also compared to the 2011 aggregate small business loan activity. The data, divided into categories based on Census Tract Income Level, is compared both in terms of number of loans provided in the year 2011 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2011 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency, February 7, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.

City of Boston 2010 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

Webster Bank Annual Report 2011.

FDIC Institution Directory

<http://www2.fdic.gov/idasp/main.asp>

Webster Bank website:

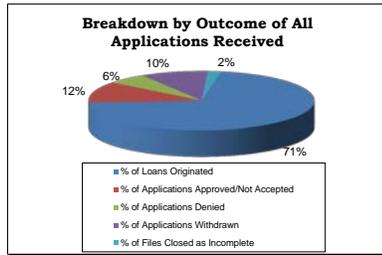
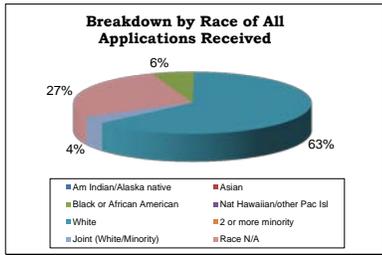
<http://www.websterbank.com/>

Webster Bank HMDA Mortgage Lending

2011

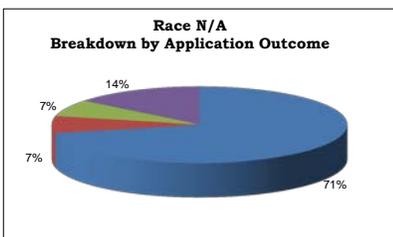
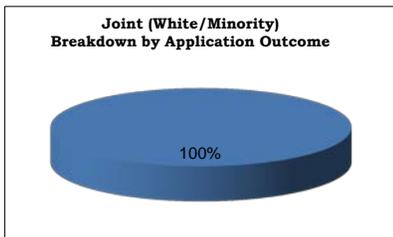
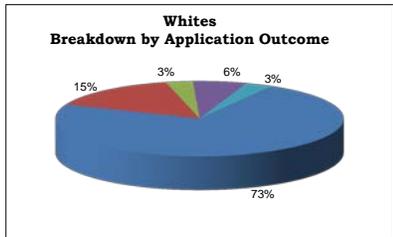
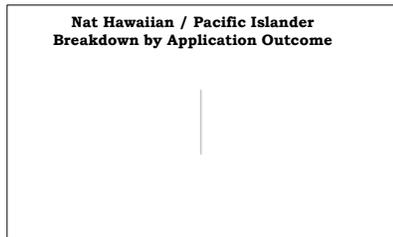
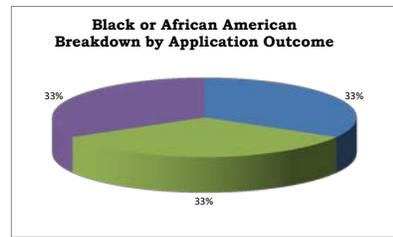
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	3	6%	1	33%	0	0%	1	33%	1	33%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	33	63%	24	73%	5	15%	1	3%	2	6%	1	3%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	14	27%	10	71%	1	7%	1	7%	2	14%	0	0%
Total	52	100%	37	71%	6	12%	3	6%	5	10%	1	2%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

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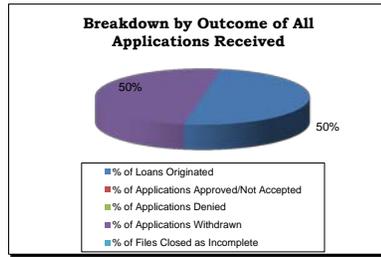
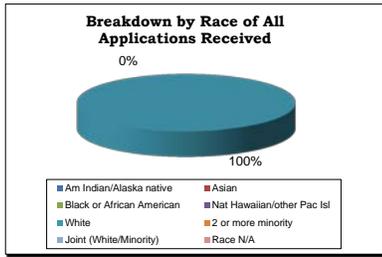


- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

Webster Low-Income Mortgage Lending 2011

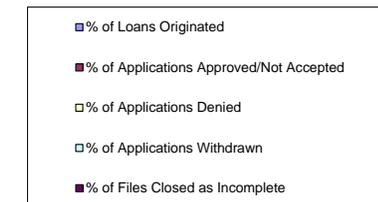
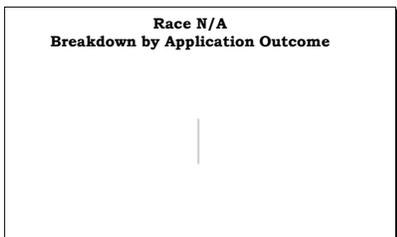
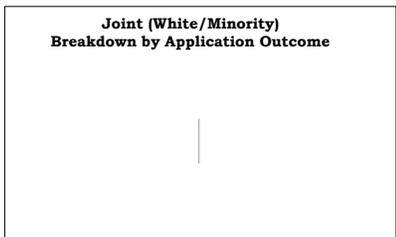
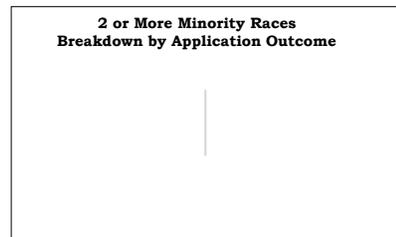
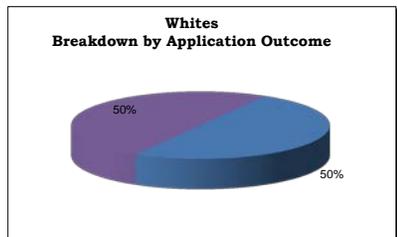
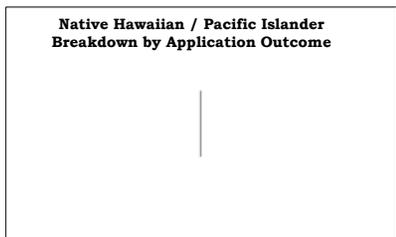
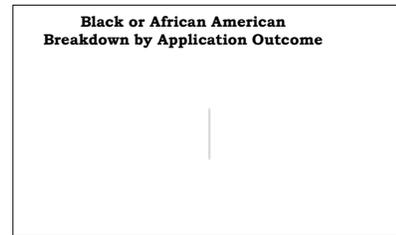
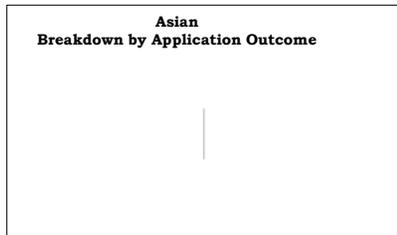
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	100%	1	50%	0	0%	0	0%	1	50%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	100%	1	50%	0	0%	0	0%	1	50%	0	0%

The chart at the right is the breakdown by race of all the applications received. For example: the total number of Asian applications are highlighted in blue, the total number of Black applications are highlighted in red, etc.



The chart at the left is the percentage breakdown by outcome of all the applications received. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.

The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



Compared against the MSA Aggregate Total

2011

Webster Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	3	0%	1	0%	0	0%	1	1%	1	1%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	33	0%	24	0%	5	1%	1	0%	2	0%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	2	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	14	1%	10	1%	1	1%	1	0%	2	1%	0	0%
Total	52	0%	37	0%	6	1%	3	0%	5	0%	1	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.

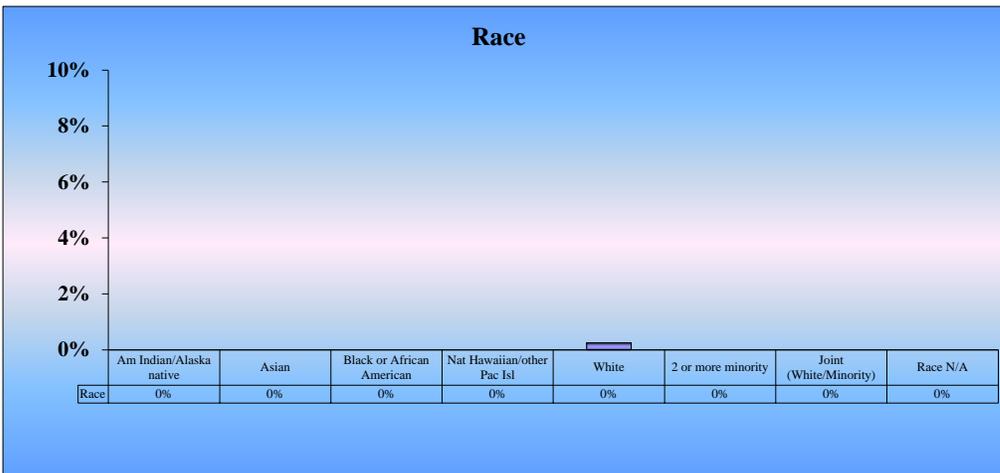


Webster Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	0%	1	0%	0	0%	0	0%	1	1%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	2	0%	1	0%	0	0%	0	0%	1	1%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Employment Information





Appendix A



Appendix A

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Appendix B



Appendix B

Community Reinvestment Act

Overview

The Community Reinvestment Act (CRA) was placed into law in 1977. Its primary purpose was to prevent redlining. It requires banks and other savings institutions to take positive steps in meeting the credit needs of all the communities to whom they provide services. This includes those in low- and moderate-income areas.

The Federal Reserve Board, Office of the Comptroller of the Currency, Office of Thrift Supervision and the Federal Deposit Insurance Corporation, review and evaluate whether banks are meeting the credit needs of the communities being served. This evaluation, depending on its outcome, can impact an institution's ability to expand through opening new branches or merging with another institution.

The CRA gives the areas being served the ability to intervene in the process of regulation. Some of the concerned citizens groups may include: community groups, non-profit development organizations, small business organizations, and public agencies. They may make specific recommendations as to specific areas of improvement, depending on the performance of the financial institution in question.

Programs are then developed that list the steps that must be taken in order for the institution to improve its lending record in low and moderate-income areas.

The CRA has freed up more than a trillion dollars in loans targeted to residents and businesses located in urban and rural neighborhoods. Financial institutions have also found that the CRA can provide additional, profitable business, so they take it very seriously.

CRA examinations are conducted regularly. The examiners look at five categories:

1. Ascertainment of community needs.
2. Marketing and types of credit offered and extended.
3. Geographic distribution and record of opening and closing offices.
4. Discrimination and other illegal practices.
5. Community Development.

The exam period varies from six months, for an institution that has an unsatisfactory rating; to twelve months for a billion dollar, or larger, national bank; to several years for smaller institutions regulated by the Office of the Comptroller of the Currency (OCC).

The Financial Institutions Reform, Recovery and Enforcement Act of 1989 (FIRREA), formerly known as the S&L Bailout Bill, made three major changes to the CRA:

- Ratings for institutions were changed. Previously there had been a scale of one to five; one being "outstanding", and five being "substantial non-compliance". The general (or overall) ratings are now reported in four categories: (Ratings within specific test areas continue to be reported in five categories as outlined in Appendix C).
 - Outstanding
 - Satisfactory
 - Needs Improvement
 - Substantial Non-Compliance
- All ratings are now disclosed to the institutions and to the public. CRA evaluations are now published.
- As of January, 1997, large banks are being evaluated based on their lending, service and investment activities. Larger institutions are being required to disclose information about their small business lending activity, and their mortgage lending activity outside of metropolitan area



Appendix C



Appendix C

Rating Definitions

Lending Performance

Outstanding

Excellent responsiveness to credit needs in its assessment area(s) taking into consideration the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A substantial majority of its loans are made in its assessment area. An excellent geographic distribution of loans in its assessment area(s). An excellent record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Extensive use of innovative or flexible lending practices, in a safe and sound manner, to address the credit needs of low or moderate-income individuals or geographies. Is a leader in making community development loans.

High Satisfactory

Good responsiveness to the credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A high percentage of loans are made in its assessment area(s). A good geographic distribution of loans in its assessment area(s). A good distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses (including farms), given the product lines of the bank. A good record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. It has made a relatively high level of community development loans.

Low Satisfactory

Adequate responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). An adequate percentage of its loans are made in its

assessment area(s). An adequate geographic distribution of loans in its assessment area(s). An adequate distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines offered by the bank. An adequate record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). Limited use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. Has made an adequate level of community development loans.

Needs to Improve

Poor responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm and consumer loans, if applicable, in its assessment area(s). A small percentage of its loans are made in its assessment area(s). A poor geographic distribution of loans, particularly to low or moderate-income geographies, in its assessment area(s). A poor distribution, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines of the bank. A poor record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms);. Little use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low and moderate-income individuals and geographies. It has made a low level of community development loans.

Substantial Noncompliance

A very poor responsiveness to credit needs in its assessment area(s), taking into account the number and amount of home mortgage, small business, small farm, and consumer loans, if applicable, in its assessment area(s). A very small percentage of its loans made in its assessment area(s). A very poor geographic distribution of loans, particularly in its assessment area(s), of loans among individuals of different income levels and businesses of different sizes (including farms), given the product lines offered by the bank. A very poor



record of serving the credit needs of highly economically disadvantaged areas in its assessment area(s), low-income individuals, or businesses (including farms). No use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low or moderate-income individuals or geographies. It has few, if any community development loans.

Investment Performance

Outstanding

An excellent level of qualified investments, particularly those that are not routinely provided by private investors. Often in a leadership position. Extensive use of innovative or complex, qualified investments. Excellent responsiveness to credit and community development needs.

High Satisfactory

A significant level of qualified investments, particularly those that are not routinely provided by private investors. Occasionally in a leadership position. Extensive use of innovative or complex, qualified investments. Excellent responsiveness to credit and community development needs.

Low Satisfactory

An adequate level of qualified investments, particularly those that are not routinely provided by private investors. Rarely in a leadership position. Occasional use of innovative or complex, qualified investments. Adequate responsiveness to credit and community development needs.

Needs to improve

A poor level of qualified investments, particularly those that are not routinely provided by private investors. Rare use of innovative or complex qualified investments. Poor responsiveness to credit and community development needs.

Substantial noncompliance

Few if any, qualified investments, particularly those that are not routinely provided by private investors. No use of innovative or complex qualified investments. Very poor responsiveness to credit and community development needs.

Service Performance

Outstanding

Its service delivery systems are readily accessible to geographies and individuals of different income levels in its assessment area(s); To the extent changes have been made, its record of opening and closing branches has improved the accessibility of its delivery systems, particularly in low or moderate-income geographies or to low or moderate-income individuals; Its services (including, where appropriate, business hours) are tailored to the convenience and needs of its assessment area(s), particularly low or moderate-income geographies or low or moderate-income individuals; It is a leader in providing community development services.

High Satisfactory

Its service delivery systems are accessible to geographies and individuals of different income levels in its assessment area(s). Its record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly in low and moderate-income geographies and to low and moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low and moderate-income geographies and low and moderate-income individuals. It provides a relatively high level of community development services.

Low satisfactory

Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area(s). Its record of opening and closing branches has generally not adversely effected the accessibility of its delivery systems, particularly in low and moderate-income geographies and to low and moderate-income individuals. Its services (including where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low and moderate-income geographies and low and moderate-income individuals. It provides an adequate level of community development services.

Needs to improve

Its service delivery services are unreasonably inaccessible to portions of its assessment area(s),



particularly to low or moderate-income geographies or to low or moderate-income individuals. Its record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly low or moderate-income geographies, or to low or moderate-income individuals. Its services (including, where appropriate, business hours) vary in a way that inconveniences its assessment area(s), particularly low or moderate-income geographies, or low or moderate-income individuals. It provides a limited level of community development services.

Substantial noncompliance

Its services delivery systems are unreasonably inaccessible to significant portions of its assessment area(s) particularly to low or moderate-income geographies or to low or moderate-income individuals. Its record of opening and closing branches has a significant, adverse effect on the accessibility of its delivery systems, particularly in low or moderate-income geographies, or to low or moderate-income individuals. Its services (including, where appropriate, business hours) vary in a way that significantly inconveniences its assessment area(s), particularly low or moderate-income geographies or low or moderate-income individuals. It provides few, if any, community development services.



Appendix D



Appendix D

Definitions

Income Levels

Low Income

Median income less than 50% of the Primary Metropolitan Statistical Area's Median Family Income (MFHI).

Moderate Income

Median income level 50% to less than 80% of the MFHI.

Middle Income

Median income 80% to less than 120% of the MFHI.

Upper Income

Median income equal to or greater than 120% of MFHI.

Regulations and Regulatory Agencies

FDIC

The Federal Deposit Insurance Corporation (FDIC) is the independent deposit insurance agency created by Congress to maintain stability and public confidence in the nation's banking system. In its unique role as deposit insurer of banks and savings associations, and in cooperation with the other federal and state regulatory agencies, the FDIC promotes the safety and soundness of insured depository institutions and the U.S. financial system, by identifying, monitoring and addressing risks to the deposit insurance funds. In addition, the FDIC gathers data about individual financial institutions and the banking industry. FDIC publications contain information the agency has gathered about the banking industry, including statistical reports and studies that examine current and historical issues in banking and economic trends. There are various data applications that profile the banking industry, analyze national and regional trends, share original research on issues related to banking and deposit insurance, and report on such important issues as emerging risk and underwriting practices. They also compile financial data concerning FDIC-insured institutions. There are historical studies of deposit insurance from its beginnings in the 1930s.

FFIEC

The Federal Financial Institutions Examination Council (FFIEC) was established March 10, 1979. The Council is a formal interagency body, empowered to prescribe uniform principles, standards, and report forms, for federal examination of financial institutions by the Board of Governors of the Federal Reserve System (FRB). The Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC) and the Office of Thrift Supervision (OTS). FFIEC makes recommendations to promote uniformity in the supervision of financial institutions. The Council was given additional statutory responsibilities by section 340 of the Housing and Community Development Act of 1980 to facilitate public access to data that depository institutions must disclose under the Home Mortgage Disclosure Act of 1975 (HMDA) and the aggregation of annual HMDA data, by census tract, for each metropolitan statistical area (MSA). The Council has established, in accordance with the requirement of the statute, and advisory State Liaison Committee composed of five representatives of the state supervisory agencies.

HMDA

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Bank's 'Regulation C'. This regulation provides the public loan data that can be used to assist in the following: to determine whether financial institutions are serving the housing needs of their communities; to assist public officials in distributing public-sector investments, so as to attract private investments to areas where it is needed; and in identifying possible discriminatory lending patterns. The regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate and disclosure reports for each metropolitan statistical area (MSA) that are available to the public at central data depositories located in each MSA.



OCC

The Office of the Comptroller of the Currency (OCC) charters, regulates, and supervises all national banks. It also supervises the federal branches and agencies of foreign banks. The OCC was established in 1863 as a bureau of the U.S. Department of the Treasury. The Office's principal function is the supervision of the national banking system. A staff of over 1,800 bank examiners performs the statutorily required, regular examinations of more than 2,500 banks subject to the Comptroller's supervision. The CRA's implementing regulation requires the OCC to access a national bank's record of helping to meet the credit needs of its entire community, including low and moderate-income neighborhoods, consistent with safe and sound operations. It also mandates that the agency consider that record, in its evaluation of a bank's application for new branches, relocation of an existing branch, bank mergers and consolidations, and other corporate activities. In general, the OCC conducts a CRA examination of a bank every 24 months.

OTS

The Office of Thrift Supervision (OTS) is the primary regulator of all federal and many state-chartered thrift institutions, which include savings banks and savings and loan associations. The OTS was established as an office of the Department of the Treasury on August 9, 1989. The OTS has five regional offices, located in: Jersey City, Atlanta, Chicago, Dallas, and San Francisco. The Community Reinvestment Act requires the OTS to assess a savings association's record of helping meet the credit needs of its entire community, including low and moderate-income neighborhoods, consistent with safe and sound operations. It also mandates that the agency consider that record, in its evaluation of savings association's application for new branches, relocation of an existing branch, mergers and consolidations, and other corporate activities. In general, the OTS conducts a CRA examination of savings associations every 24 months. A written evaluation of the savings association's CRA activities, including a CRA rating, is prepared at the end of each CRA examination. Pursuant to the CRA, savings associations are assigned one of four statutory ratings: Outstanding, Satisfactory, Needs to Improve, Substantial Noncompliance





BankIQ



BankIQ

120 Coolidge Street
Brookline, MA 02446-5808
jnoble@bankiq.com

BankIQ prepared this document for the City of Boston.

With over twenty years' Government Banking experience, BankIQ is an independent, woman-owned and operated business. BankIQ specializes in collecting, analyzing, preparing, and documenting Financial Services information for the Public Sector.

For further information, contact us via email at jnoble@bankiq.com