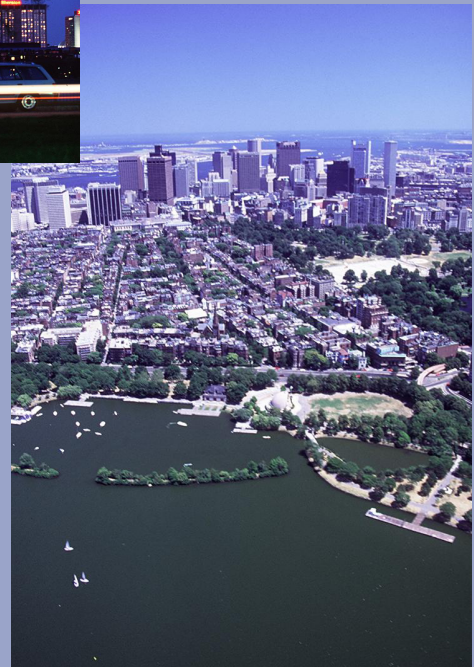


2001 LINKED DEPOSIT BANKING REPORT TO THE MAYOR



CITY OF BOSTON



Prepared March 2003 by NobleAssociates

Cover photos: ©2000, Photos To Go

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The State of Banking in the City of Boston



By 2001, the banking landscape in Boston was significantly changed by the merger and acquisition activity of the previous years. Fleet, completing its acquisition of BankBoston, was the largest Boston bank. Sovereign Bank moved to the region following its purchase of the 250+ divested Fleet/BankBoston branches. Citizens bank completed its acquisition of US Trust.

An article published in the Boston Globe in November of 2001, cited statistics showing that the merger of Boston's two largest banks resulted in fewer available mortgages from the resulting institution. The article titled "When 1+1 = Less Than 1", argued that in the first full year following the merger, mortgage loans initiated by the combined bank decreased by 55% in the City of Boston. It was expected Sovereign Bank, the bank which purchased Fleet's divested branches, might take up the slack. However, jointly the two banks made only half the number of loans made before the merger.¹ As Sovereign Bank gained a better foothold in the New England market and Boston, its lending activity increased.

Compounding this factor, further difficulties were outlined in a report from the Massachusetts Community and Banking Council (MCBC). According to the report prepared by Jim Campen of UMass Boston, African-Americans were denied loans three times as often as white applicants were in 2001. The report also showed that minority borrowers received a lower portion of home purchase loans than in any year during the 1990s.²

With fewer loans initiated by local banks and fewer minorities receiving the loans remaining, many borrowers are turning to out-of-state lenders. These lenders are not subject to the Massachusetts Community Reinvestment Act, which ensures that banks serve the communities in which they have branches. In Boston, sub-prime lending grew by 29% in 2001 and minorities receive a disproportionately large share of sub-prime refinance loans.³ Sub-prime

loans are generally at a higher rate and are potentially predatory. Sub-prime lending in minority neighborhoods was 7.1 times higher than in white neighborhoods in 2001.⁴

Late in 2000 and continued into 2001, mortgage interest rates decreased. By the fourth quarter of 2001, home loan requests were setting records. Mortgage refinancing had also hit a peak in 2001 (with declines at year end).

Against the backdrop of increasing mortgage activity and decreasing percentages of minorities served, changes were also occurring with CRA enforcement itself. In 2001, 77 CRA ratings were awarded in Massachusetts. This is the fewest number of banks to receive the ratings since the program began to become public at the beginning of the 1990s. Although there are fewer banks to regulate, the decline is primarily due to the provisions of the Gramm-Leach-Bliley act of 1999 which mandated fewer CRA exams.⁵ Of the 77 CRA ratings awarded to Massachusetts Banks by all regulators combined during 2001,

15.6% were "Outstanding". This was the first year since 1994 that the share of Outstanding ratings had dropped below 20%. A

possible reason for the drop may be the regulators responding to previous CRA "grade-inflation".⁶

During 2001, service levels for bank branch activity and availability of ATM's remained adequate for the low to moderate income neighborhoods in Boston. Also in 2001, the highest percentage of employees in the banks measured is women. However, the percentage of women in the professional ranks is much lower. Minorities continue to be fewer in number and, in the professional arena, their numbers drop appreciably.

Overall, the City of Boston needs to continue to monitor the activities of these banking institutions to ensure that all the citizens of Boston are receiving adequate banking services. Continuous, year-over-year tracking is needed to

The State of Banking in the City of Boston

¹ Boston Globe, When 1+1 = Less Than 1, November 2, 2001.

² University Reporter, New Report Documents Persistence of Racial and Ethnic Disparities in Mortgage Lending in Boston, February 2003.

³ Ibid.

⁴ Ibid.

⁵ Massachusetts affordable Housing Alliance, CRA Ratings of Massachusetts Banks and Credit Unions, 2001, February 2002.

⁶ Ibid.



determine the net effect that changes in the banking industry have on the residents of the City of Boston.

2001 Boston MSA Comparative Charts

The charts on the following three pages give different views of the mortgage lending activity in the Boston MSA.

In the first two charts, lending totals of all lenders (the lenders listed in this report is 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 (excluding Mellon) compared against the entire MSA.

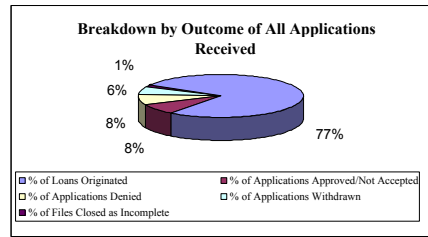
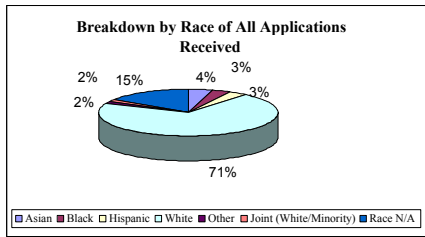
Aggregate Lending Information - HMDA

MSA: 1120 - Boston, MA - NH

2001

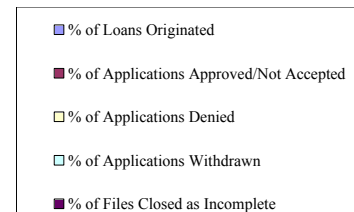
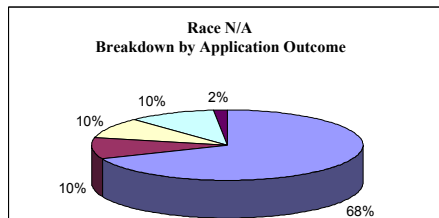
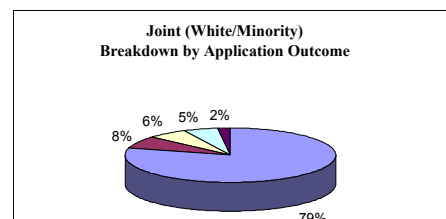
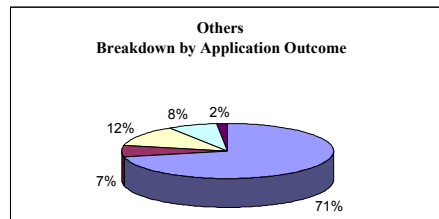
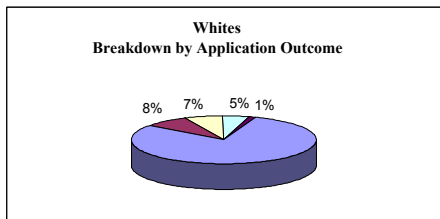
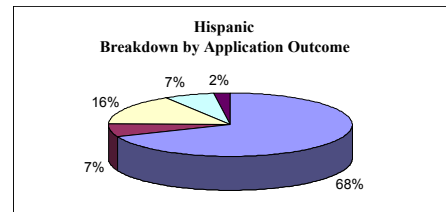
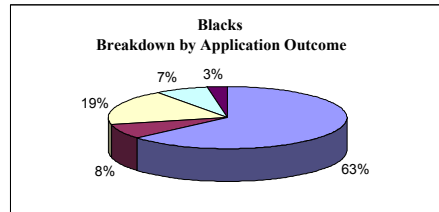
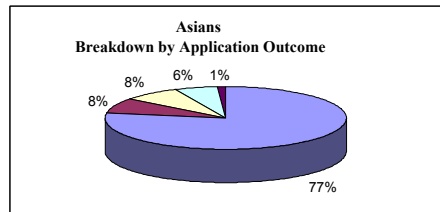
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	2730	4%	2114	77%	215	8%	214	8%	160	6%	27	1%
Black	1995	3%	1268	64%	157	8%	373	19%	144	7%	53	3%
Hispanic	2002	3%	1380	69%	131	7%	313	16%	136	7%	42	2%
White	43050	70%	34348	80%	3305	8%	2831	7%	2084	5%	482	1%
Other	1044	2%	746	71%	71	7%	130	12%	79	8%	18	2%
Joint (White/Minority)	941	2%	745	79%	71	8%	58	6%	50	5%	17	2%
Race N/A	9436	15%	6463	68%	924	10%	931	10%	968	10%	150	2%
Total	61198	100%	47064	77%	4874	8%	4850	8%	3621	6%	789	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 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.



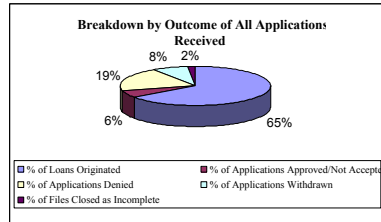
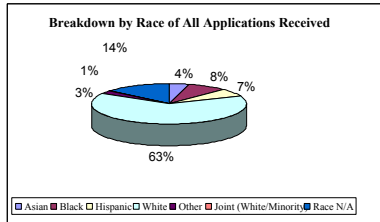
Aggregate Low-Income Mortgage Lending

MSA: 1120 - Boston, MA - NH

2001

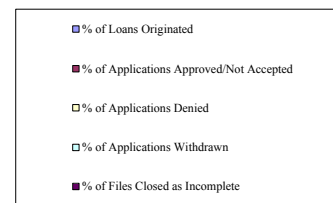
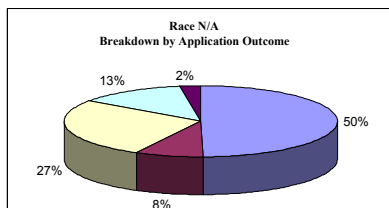
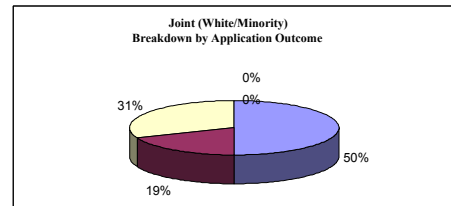
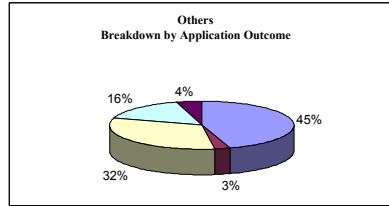
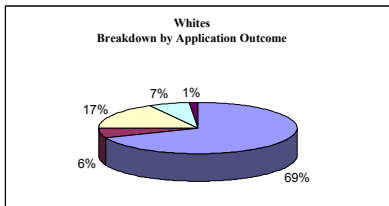
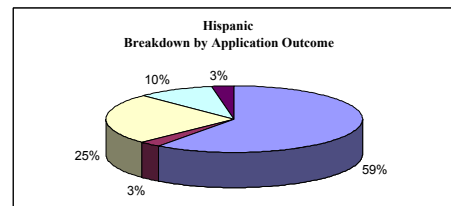
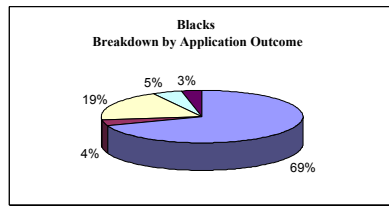
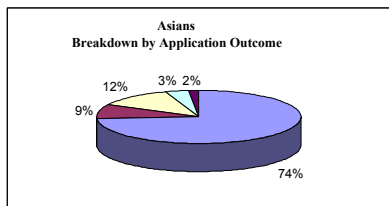
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	115	4%	85	74%	10	9%	14	12%	4	3%	2	2%
Black	211	8%	146	69%	8	4%	40	19%	10	5%	7	3%
Hispanic	185	7%	111	60%	5	3%	46	25%	18	10%	5	3%
White	1725	64%	1187	69%	105	6%	294	17%	117	7%	22	1%
Other	69	3%	31	45%	2	3%	22	32%	11	16%	3	4%
Joint (White/Minority)	16	1%	8	50%	3	19%	5	31%	0	0%	0	0%
Race N/A	365	14%	181	50%	30	8%	98	27%	47	13%	9	2%
Total	2686	100%	1749	65%	163	6%	519	19%	207	8%	48	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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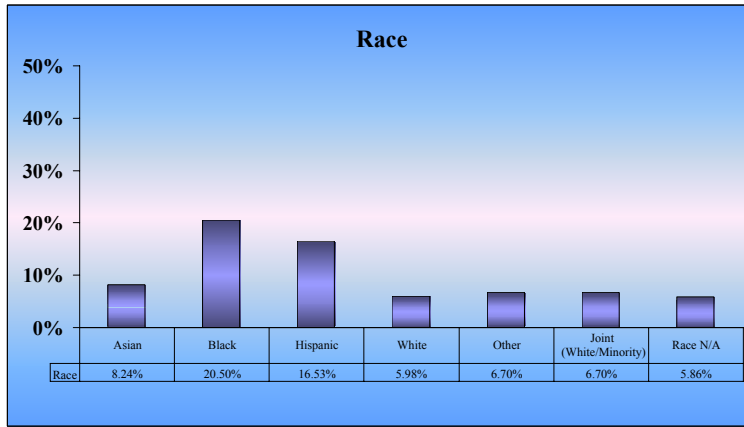


Link Deposit Report Banks Compared Against the MSA Aggregate Total 2001

HMDA Mortgage Information for Banks covered in this report (excluding Mellon)

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
Asian	225	8.24%	157	7.43%	18	8.37%	30	14.02%	17	10.63%	3	11.11%
Black	409	20.50%	287	22.63%	18	11.46%	65	17.43%	27	18.75%	12	22.64%
Hispanic	331	16.53%	210	15.22%	12	9.16%	72	23.00%	23	16.91%	14	33.33%
White	2575	5.98%	1986	5.78%	141	4.27%	290	10.24%	121	5.81%	37	7.68%
Other	70	6.70%	42	5.63%	2	2.82%	19	14.62%	5	6.33%	2	11.11%
Joint (White/Minority)	63	6.70%	46	6.17%	6	8.45%	5	8.62%	4	8.00%	2	11.76%
Race N/A	553	5.86%	323	5.00%	53	5.74%	135	14.50%	27	2.79%	15	10.00%
Total	4226	6.91%	3051	6.48%	250	5.13%	616	12.70%	224	6.19%	85	10.77%

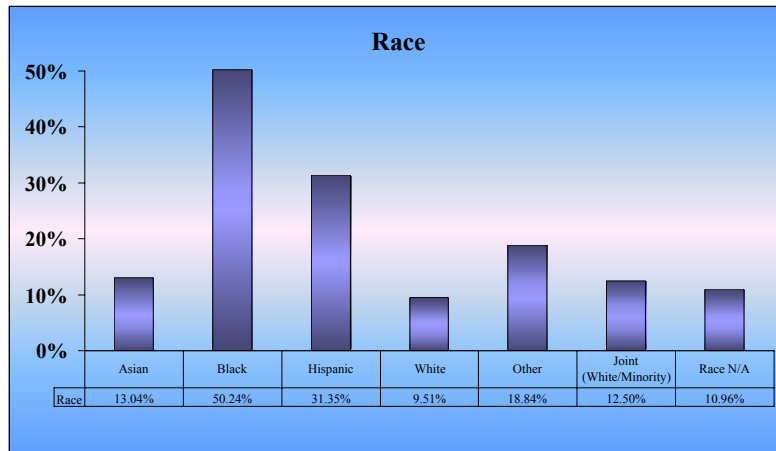
The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered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

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
Asian	15	13.04%	14	16.47%	0	0.00%	0	0.00%	0	0.00%	1	50.00%
Black	106	50.24%	83	56.85%	3	37.50%	11	27.50%	5	50.00%	4	57.14%
Hispanic	58	31.35%	30	27.03%	1	20.00%	17	36.96%	7	38.89%	3	60.00%
White	164	9.51%	119	10.03%	4	3.81%	32	10.88%	7	5.98%	2	9.09%
Other	13	18.84%	3	9.68%	0	0.00%	8	36.36%	1	9.09%	1	33.33%
Joint (White/Minority)	2	12.50%	0	0.00%	2	66.67%	0	0.00%	0	0.00%	0	0.00%
Race N/A	40	10.96%	20	11.05%	2	6.67%	16	16.33%	0	0.00%	2	22.22%
Total	398	14.82%	269	15.38%	12	7.36%	84	16.18%	20	9.66%	13	27.08%

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 pages 3-1 to 15-1)

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) ratings⁷ are for the year 2001.

Bank	Rating
Boston Bank of Commerce (BBOC)	SATISFACTORY
Boston Private Bank	OUTSTANDING
Century Bank and Trust (Century Bank)	SATISFACTORY
Citizens Bank of Massachusetts	OUTSTANDING
East Boston Savings Bank (EBSB)	OUTSTANDING
Eastern Bank	OUTSTANDING
Fleet Bank	OUTSTANDING
Hyde Park Cooperative Bank	SATISFACTORY
Hyde Park Savings Bank (HPSB)	SATISFACTORY
Liberty Bank and Trust Company (Liberty Bank)	SATISFACTORY
Mellon Bank, N.A. ⁸	OUTSTANDING
Sovereign Bank	SATISFACTORY
Wainwright Bank and Trust (Wainwright Bank)	OUTSTANDING

⁷ See Appendix for rating definitions.

⁸ Based on information from Philadelphia, PA.

**Overall and Test Ratings**

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

Boston Bank of Commerce⁹

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	SATISFACTORY
Lending:	NOT RATED
Investment:	NOT RATED
Service:	NOT RATED

Boston Private Bank & Trust Company¹⁰

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

Century Bank & Trust¹¹

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

Citizen's Bank of Massachusetts¹²

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

East Boston Savings Bank¹³

Regulatory Body:	Massachusetts Division of Banks
Area Tested	Rating
Overall:	OUTSTANDING
Lending:	OUTSTANDING
Investment:	SATISFACTORY
Service:	OUTSTANDING

Eastern Bank¹⁴

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

Fleet Bank¹⁵

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

Hyde Park Cooperative Bank¹⁶

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

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 FDIC published 1999.

¹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2002.

¹¹ Ibid.

¹² Based on most recent CRA Performance Evaluation by FDIC published 1999.

¹³ Based on most recent CRA Performance Evaluation by Massachusetts Division of Banks published 2002.

¹⁴ Based on most recent CRA Performance Evaluation by FDIC published 2001.

¹⁵ Based on most recent CRA Performance Evaluation by FDIC published 2001.

¹⁶ 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 1999.



Hyde Park Savings Bank¹⁷

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

Wainwright Bank & Trust²¹

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

Liberty Bank & Trust¹⁸

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	SATISFACTORY
Lending:	NOT RATED
Investment:	NOT RATED
Service:	NOT RATED

Mellon Bank, N.A.¹⁹

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

Sovereign Bank (Massachusetts)²⁰

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

¹⁷ Based on most recent CRA Performance Evaluation by FDIC published 2001.

¹⁸ 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 FDIC published 1999.

¹⁹ Based on most recent CRA Performance Evaluation by FDIC published 2001.

²⁰ Based on most recent CRA Performance Evaluation by OTS published 2000.

²¹ Based on most recent CRA Performance Evaluation by FDIC published 2002.



Boston Bank of Commerce



Overview

Boston Bank of Commerce
133 Federal Street
Boston, MA 02110

Description

Boston Bank of Commerce is a minority owned, commercially chartered financial institution, headquartered in Boston, with total assets of \$151 million. Boston Bank of Commerce maintains 2 branches in Boston and 2 in Florida. In 2001, Boston Bank of Commerce announced a merger with Founders National Bank of Commerce in Los Angeles, making it the third largest black financial institution in the United States. The merger/acquisition was completed in December of 2002, resulting in a single institution named One United Bank.

Principal Officers

CEO

Kevin Cohee
133 Federal Street
Boston, MA
617-457-4491

CFO

James Mundy
133 Federal Street
Boston, MA
617-457-4491

Chief Compliance Officer

Mary Schrader
133 Federal Street
Boston, MA
617-457-4491

Employees

Number of Employees	NA
Number of Employees in Boston	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches – Total	4
Branches Within Boston PSMA	2
Number of ATMs	0
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	SATISFACTORY ²²
Lending Test Rating	NOT RATED
Investment Test Rating	NOT RATED
Service Test Rating	NOT RATED

²² Based on most recent CRA Performance Evaluation by FDIC published 1999.



Discussion

Overall rating: SATISFACTORY²³

Lending Test

Lending Test Rating: NOT RATED²⁴

General Responsiveness to Credit Needs

There was a downward trend in the loan-to-deposit ratio between 1997-1999, as noted by the FDIC, in their 1999 CRA review. It was also noted that if this trend continued, or was not reversed, it could be interpreted as an indication of an overall lack of lending, which could significantly affect future CRA ratings.

This is of particular concern. The low loan-to-deposit ratio appears to support a business strategy focused on the acquisition of branches and financial institutions outside the region, using liquidity generated from Massachusetts-based deposits and assets.

In 1999, neither HMDA, nor low-income mortgages were reported. In 2000, 1 HMDA loan was recorded, but no mortgages were recorded in Boston. The recorded mortgage was not listed as a low-income mortgage loan. In 2001 no HMDA-reportable mortgage loan applications were reported and no low-income loans were reported.

Responsiveness to Low and Moderate-Income Credit Needs

During 1999 CRA review, the Boston Bank of Commerce's (BBOC) primary lending focus was on small business and community development loans. At that time they had only originated five HMDA loans within the assessment area. Since 1999, Boston Bank of Commerce originated only 1 HMDA reportable loan (in 2000) and no low-income mortgage loans in the Boston MSA.

Leadership in Community Development Loans

The 1999 FDIC review listed the following as the development programs in which BOSTON BANK OF COMMERCE was involved:

- Dimock Community Health Center
- Massachusetts 54th Society
- Urban League of Massachusetts

Investment Test

Investment Test Rating: NOT RATED²⁵

The following qualified investments were listed in the 1999 CRA report generated by the FDIC.

- Roxbury Corners Limited Partnership
- Columbia Plaza Associates

Service Test

Service Test Rating: NOT RATED²⁶

Description Service Delivery Systems

BOSTON BANK OF COMMERCE is a black-owned and managed institution. The majority of both credit and deposit services are geared to accommodate the needs of low and moderate-income individuals. All deposit products have low minimum balance requirements.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
133 Federal Street Boston, MA 02110		✓
2343 Washington Street Roxbury, MA 02119		✓
FSB: Full Service Branch		

BOSTON BANK OF COMMERCE owns no proprietary ATMs, but provides service availability for cardholders at NYCE (20,000) and CIRRUS (340,000) terminals.

²³ Based on most recent CRA Performance Evaluation by FDIC published 1999.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Ibid.



Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	0	1	0
HMDA Loans Originated	0	1	0
Low-Income Applications Received	0	0	0
Low-Income Loans Originated	0	0	0

In 1999, neither HMDA, nor low-income mortgages were reported. In 2000, 1 HMDA loan was recorded, but no mortgages were recorded in Boston. The recorded mortgage was not listed as a low-income mortgage loan. In 2001, no HMDA-reportable loan applications or originations were reported and, therefore, no low-income loans were reported.

Small Business Loans

No 2001 HMDA reportable small business loan data was available for Boston Bank of Commerce.²⁷

Loan Information By Census Tract

Please refer to the addendum [The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

²⁷ FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.



Source Documents

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; November 15, 1999.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

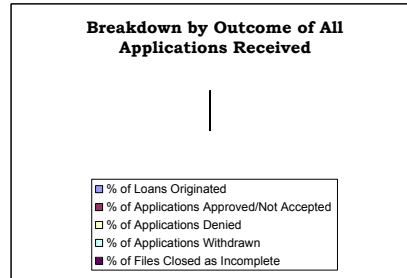
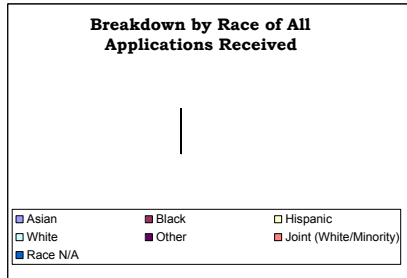
Boston Bank of Commerce website.
<http://www.oneunited.com/>

BBOC Lending Information - HMDA

2001

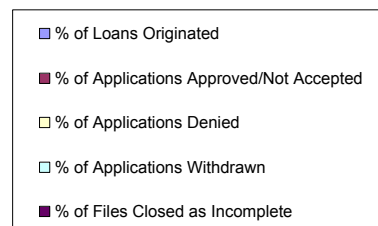
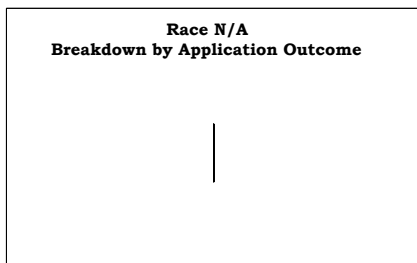
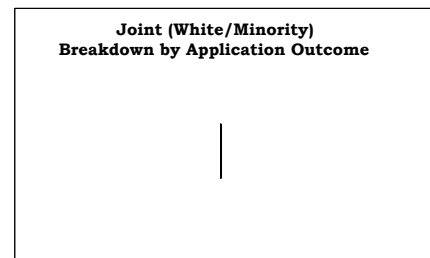
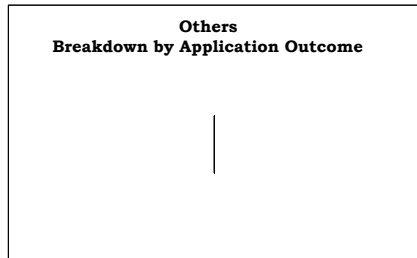
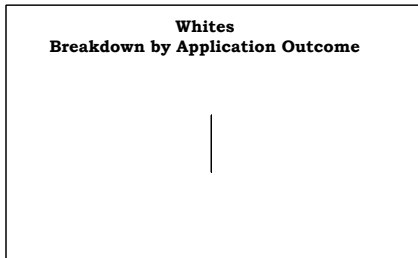
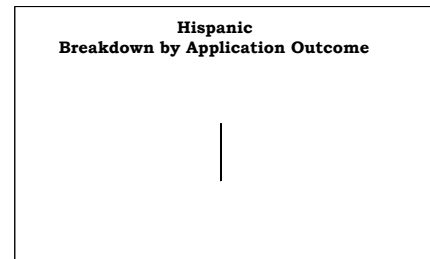
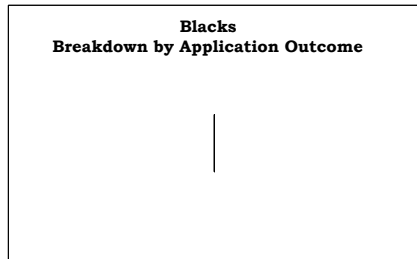
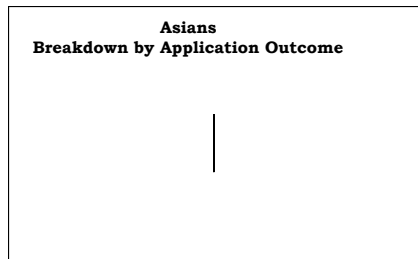
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	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%
Other	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 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.

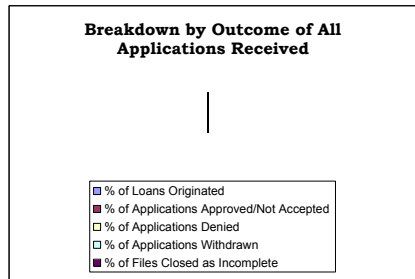
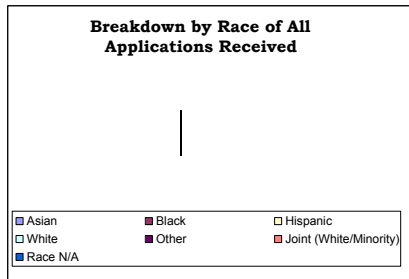


BBOC Low-Income Mortgage Lending

2001

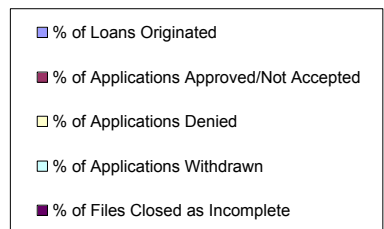
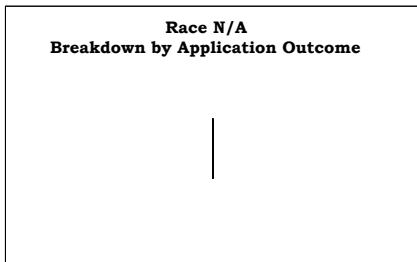
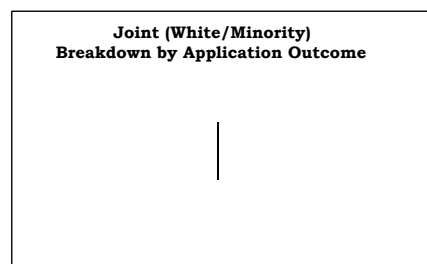
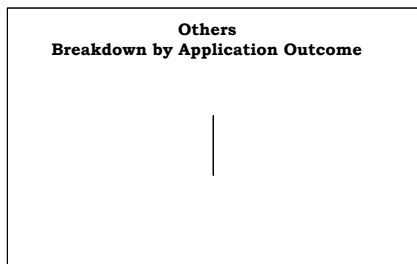
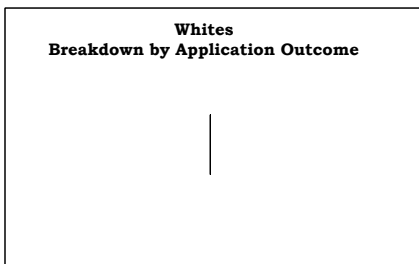
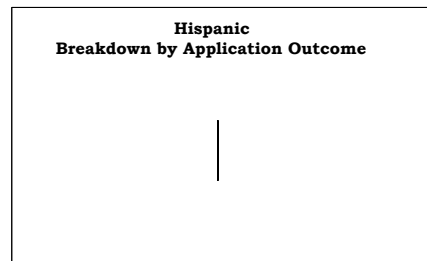
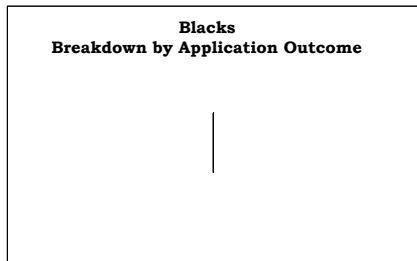
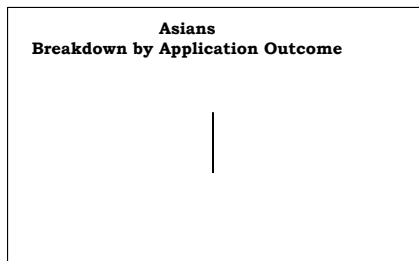
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	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%
Other	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.



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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.





Employment Information

No data available





Boston Private Bank



BOSTON PRIVATE BANK & TRUST COMPANY

Overview

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

Description

Boston Private Bank & Trust Company is a subsidiary of Boston Private Financial Holdings, a publicly traded company founded in 1987. Boston Private Bank & Trust Company specializes in providing private banking and investment services to individuals, families and businesses. Boston Private Bank & Trust Company is a \$1.5 billion (as of December 30, 2001) stock-owned financial institution.

Principal Officers

CEO

Timothy Valli
10 Post Office Square
Boston, MA
617-912-1900

President

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

CFO

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

Chief Compliance Officer

Ester Schloroltz
10 Post Office Square
Boston, MA
617-912-1900

Employees

Number of Employees	190
Number of Employees in Massachusetts	190
Percentage of Women Employees	55%
Percentage of Minority Employees	16%

Branches

Number of Branches - Total	4
Branches Within Boston PSMA	2
Number of ATMs	4
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2002
Overall Rating	OUTSTANDING ²⁸
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

²⁸Based on most recent CRA Performance Evaluation by FDIC published 2002.



Discussion

Overall rating: OUTSTANDING²⁹

Lending Test

Lending Test Rating: OUTSTANDING³⁰

General Responsiveness to Credit Needs

Boston Private Bank & Trust Company's specialty is fostering full-service banking relationships. Its niche is building relationships, especially with affluent individuals and families. The bank has been able to meet CRA obligations through ongoing involvement with several community groups. They have participated in numerous community development projects, community homeowner programs and other types of community investment services.

Boston Private Bank & Trust Company (here's the second name) offers First-Time Homebuyer Programs and affordable "soft-second" mortgage financing. Under its Accessible Banking Program, the Bank is an active provider of real estate financing for affordable housing, economic development and small business.³¹

Boston Private Bank & Trust Company is a very active lender. For the assessment period that included 2001 data, the number of HMDA-reportable loans rose by 75% from the 1999 FDIC CRA examination.

Boston Private Bank & Trust Company originates a number of its loans through the "soft-second" program. The Boston Soft Second program was developed to provide home ownership opportunities for low and moderate-income families residing in Boston. It is important to note that 2 HMDA loans are reported for each home financed through the Boston Soft Second program. In 2000 and 2001 the bank originated 280 loans (140 homes purchased) through the Boston Soft Second program. Boston Private Bank & Trust Company is the number-one lender in this program.

²⁹ Based on most recent CRA Performance Evaluation by FDIC published 2002.

³⁰ Ibid.

³¹ Boston Private Bank website.

Responsiveness to Low and Moderate-Income Credit Needs

Overall, the bank has a strong record of lending to borrowers of different income levels. Boston Private Bank & Trust Company has outperformed the other lenders operating in its assessment area, as reflected by the aggregate data, in providing home ownership to low and moderate-income borrowers.

Boston Private Bank & Trust Company offers numerous residential lending products, specifically to promote home ownership for low and moderate-income borrowers.

Leadership in Community Development Loans

Boston Private Bank & Trust Company level of community development lending is considered excellent.

Boston Private Bank & Trust Company level of community lending is considered excellent. In total, the bank originated 16 community development loans totaling \$15 million during the review period.

The following information highlights some of Boston Private Bank & Trust Company more noteworthy qualified, community development loans:

- A loan of \$977,000 to a non-profit organization to construct 10 single-family homes for moderate-income homebuyers.
- A loan for \$1,420,000 to a non-profit organization that provides transitional housing to women who are victims of domestic abuse and their children.
- A loan for \$1,255,000 to a non-profit organization that operates 26 rental-housing units in Roxbury for Section 8 housing.
- A loan for \$633,000 to a non-profit organization that serves homeless persons and at-risk women.
- A \$30,000 line of credit to a non-profit organization that serves low-income youths.
- A \$1,344,000 loan to a community development corporation operating in Roxbury and Dorchester to construct affordable housing and rental units.



- A \$1,100,000 real estate mortgage to a manufacturing entity located in a targeted East Boston neighborhood.

Investment Test

Investment Test Rating: OUTSTANDING³²

Boston Private has an excellent record of investing in its community. The bank has \$10 million of qualified investments, some of which are innovative and complex. That represents 5% of the bank's total investments and 1% of its total assets. In addition to the investments, Boston Private Bank & Trust Company donated an additional \$277,324 to a myriad of qualified community organizations. The bank donated 1.4% of its net operating income in 2001.

Service Test

Service Test Rating: OUTSTANDING³³

Description Service Delivery Systems

Boston Private Bank & Trust Company has a limited network, consisting of 2 branches. Boston Private Bank customers have access to over 900 ATMs in the bank's assessment area and through a correspondent relationship with Fleet Bank, for all deposits and withdrawals. The fee for these services is \$1.00 per transaction. The bank also offers: banking by mail via computer, international banking, and bilingual employees.

Branch Information

Boston Private Bank & Trust Company has a formal Branch Opening and Branch Closing Policy. In April 1998, the bank opened a new office located at 336 Washington Street Wellesley. In 2000 the bank opened a branch on Boylston Street in Boston (upper-income neighborhood) and in 2001 the bank added a branch in Cambridge (lower-income neighborhood), and a loan center in Jamaica Plain. The loan center in Jamaica Plain has increased access for residential and small business lending, particularly to low and moderate-income borrowers and small neighborhood businesses.

Wellesley Office

336 Washington Street
Wellesley, Massachusetts
02481
Tel: (781) 707-7700
Fax: (781) 707-7750

Back Bay Office

500 Boylston Street
Boston, Massachusetts
02116
Tel: (617) 912-4500
Fax: (617) 912-4290

Jamaica Plain Loan Center

401c Centre Street
Jamaica Plain, Massachusetts
02130
Tel: (617) 524-6050
Fax: (617) 912-4290

Kendall Square Office

One Cambridge Center
Cambridge, Massachusetts
02142
Tel: (617) 646-4800
Fax: (617) 646-4801

Special Programs

Boston Private Bank & Trust Company expends considerable resources on making applications to the Federal Home Loan Bank of Boston Affordable Housing Program on behalf of various community development organizations. This is a highly competitive funding program in which member banks, such as Boston Private Bank & Trust Company, are eligible to compete for grant money earmarked for selected, non-profit organizations. During the 2001 evaluation period, the bank was awarded 4, I changed this grants through this program

Additional Information

Boston Private Bank & Trust Company trustees, officers and employees at all levels, are actively involved with community organizations.

Boston Private Bank's president and chief executive officer (CEO) currently serves on the Board of Directors and has served as treasurer of the Ten Point Coalition. The Ten Point Coalition is a group of 50 churches mobilized to

³² Based on most recent CRA Performance Evaluation by FDIC published 2002.

³³ Ibid.



address issues germane to Boston's black youth, and community revitalization concerns.

The CRA officer is a member of the Board of Directors of the Massachusetts Community Banking Council (MCBC) Affordable Housing Committee.

The CRA officer and the mortgage loan officer are members of the Latino Homebuyer Subcommittee, which seeks to identify and overcome barriers to homeownership for this population.

The CRA officer is a member of the Board of Directors of the Metropolitan Boston Housing Partnership (MBHP) whose mission is to create and preserve affordable housing and economic opportunity for low-income people.

The bank was a sponsor of, and participated in, the City of Boston's Small Business Expo in 1997, 1998 and 1999.

Year-Over-Year at a Glance

Data for Boston Private Bank & Trust Company was not reported in the City of Boston 1999 Linked Deposit Banking Report to the Mayor.

	1999	2000	2001
HMDA Applications Received	NA	331	408
HMDA Loans Originated	NA	279	342
Low-Income Applications Received	NA	44	80
Low-Income Loans Originated	NA	36	68

Small Business Loans

Please refer to the addendum The 2001 Linked Deposit Bank 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 2001 is also compared to the 2001 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 2001 and the dollar amount

of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Annual CRA Report to the Massachusetts
Commissioner of Banks, Commonwealth of
Massachusetts, May 6, 2002.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System, 2001.

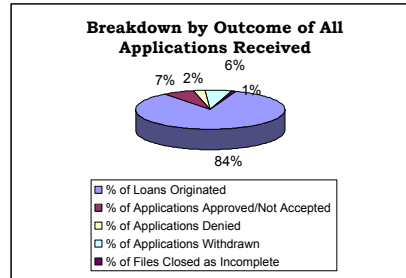
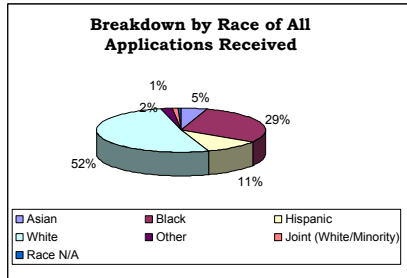
Boston Private Bank website
<http://www.bostonprivatebank.com/>

Boston Private Bank Lending Information - HMDA

2001

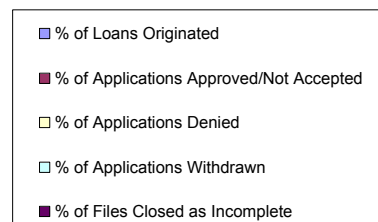
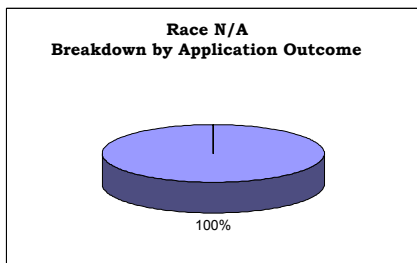
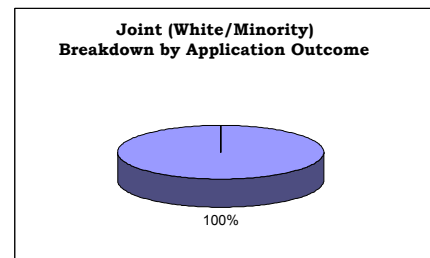
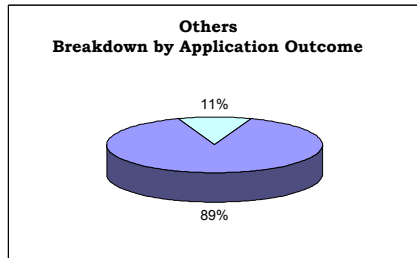
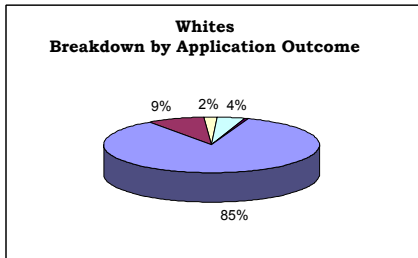
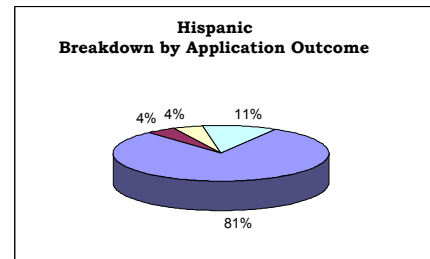
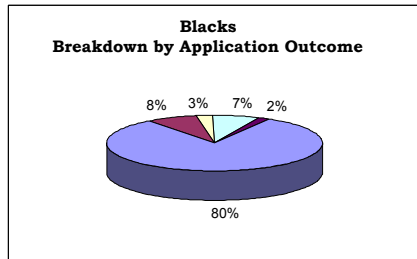
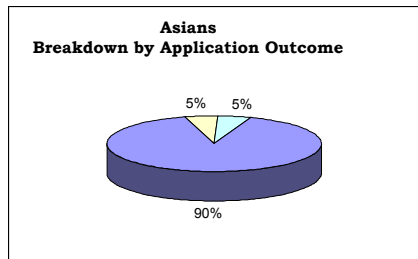
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	20	5%	18	90%	0	0%	1	5%	1	5%	0	0%
Black	118	29%	96	81%	9	8%	3	3%	8	7%	2	2%
Hispanic	45	11%	36	80%	2	4%	2	4%	5	11%	0	0%
White	209	51%	177	85%	18	9%	4	2%	9	4%	1	0%
Other	9	2%	8	89%	0	0%	0	0%	1	11%	0	0%
Joint (White/Minority)	5	1%	5	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	0%	2	100%	0	0%	0	0%	0	0%	0	0%
Total	408	100%	342	84%	29	7%	10	2%	24	6%	3	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 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.

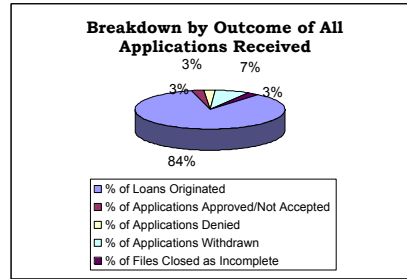
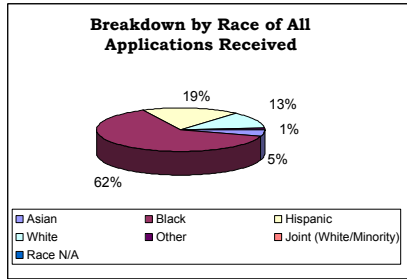


Boston Private Bank Low-Income Mortgage Lending

2001

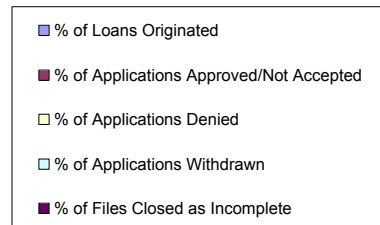
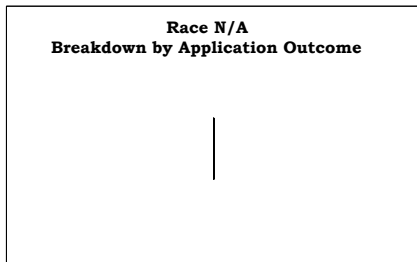
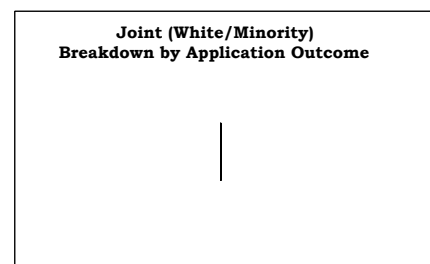
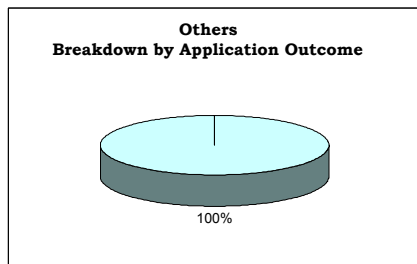
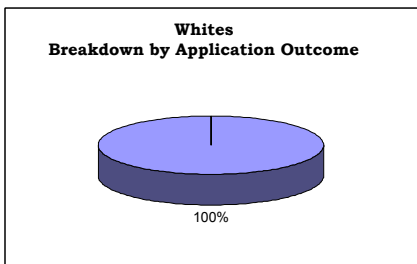
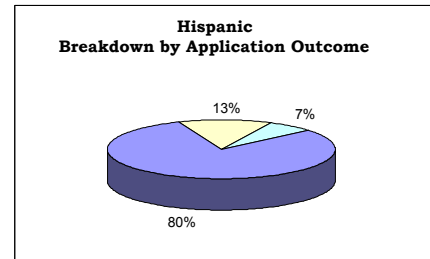
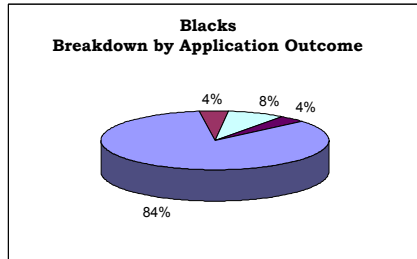
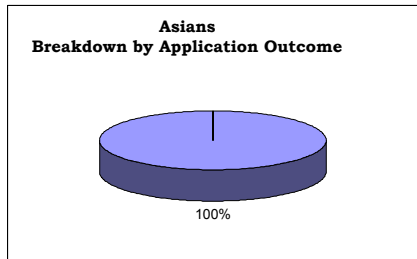
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	4	5%	4	100%	0	0%	0	0%	0	0%	0	0%
Black	50	63%	42	84%	2	4%	0	0%	4	8%	2	4%
Hispanic	15	19%	12	80%	0	0%	2	13%	1	7%	0	0%
White	10	13%	10	100%	0	0%	0	0%	0	0%	0	0%
Other	1	1%	0	0%	0	0%	0	0%	1	100%	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	80	100%	68	85%	2	3%	2	3%	6	8%	2	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.



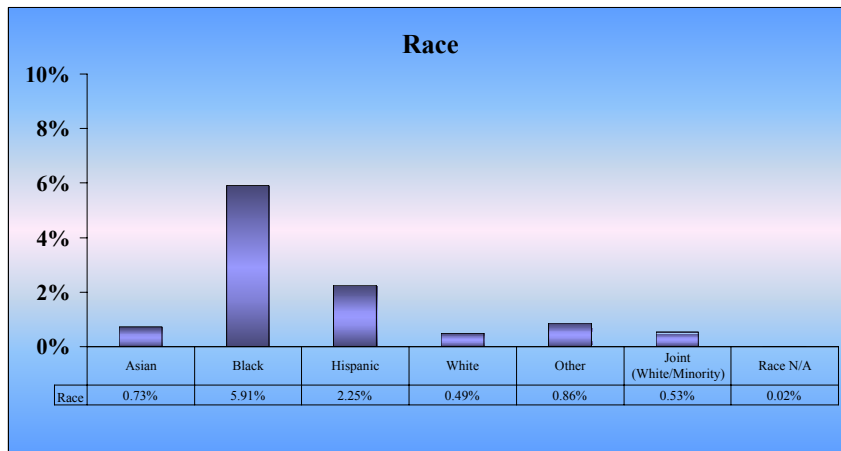
Compared against the MSA Aggregate Total

2001

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
Asian	20	0.73%	18	0.85%	0	0.00%	1	0.47%	1	0.63%	0	0.00%
Black	118	5.91%	96	7.57%	9	5.73%	3	0.80%	8	5.56%	2	3.77%
Hispanic	45	2.25%	36	2.61%	2	1.53%	2	0.64%	5	3.68%	0	0.00%
White	209	0.49%	177	0.52%	18	0.54%	4	0.14%	9	0.43%	1	0.21%
Other	9	0.86%	8	1.07%	0	0.00%	0	0.00%	1	1.27%	0	0.00%
Joint (White/Minority)	5	0.53%	5	0.67%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	2	0.02%	2	0.03%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	408	0.67%	342	0.73%	29	0.59%	10	0.21%	24	0.66%	3	0.38%

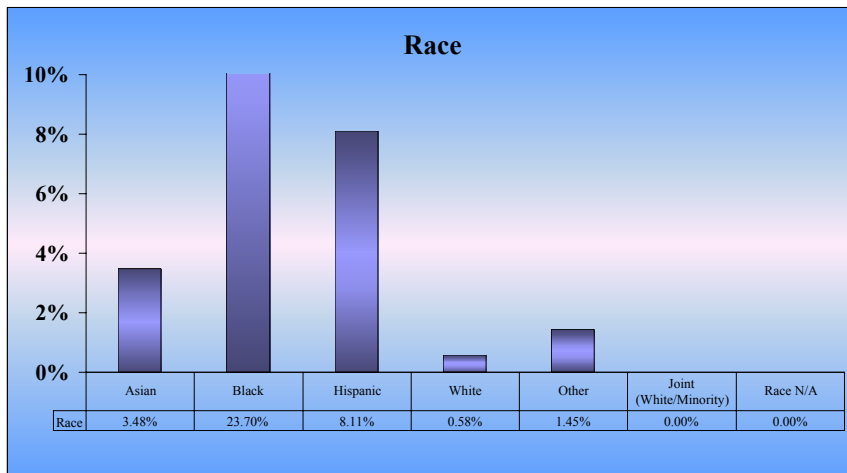
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Boston Private Bank Low-Income Mortgage Information

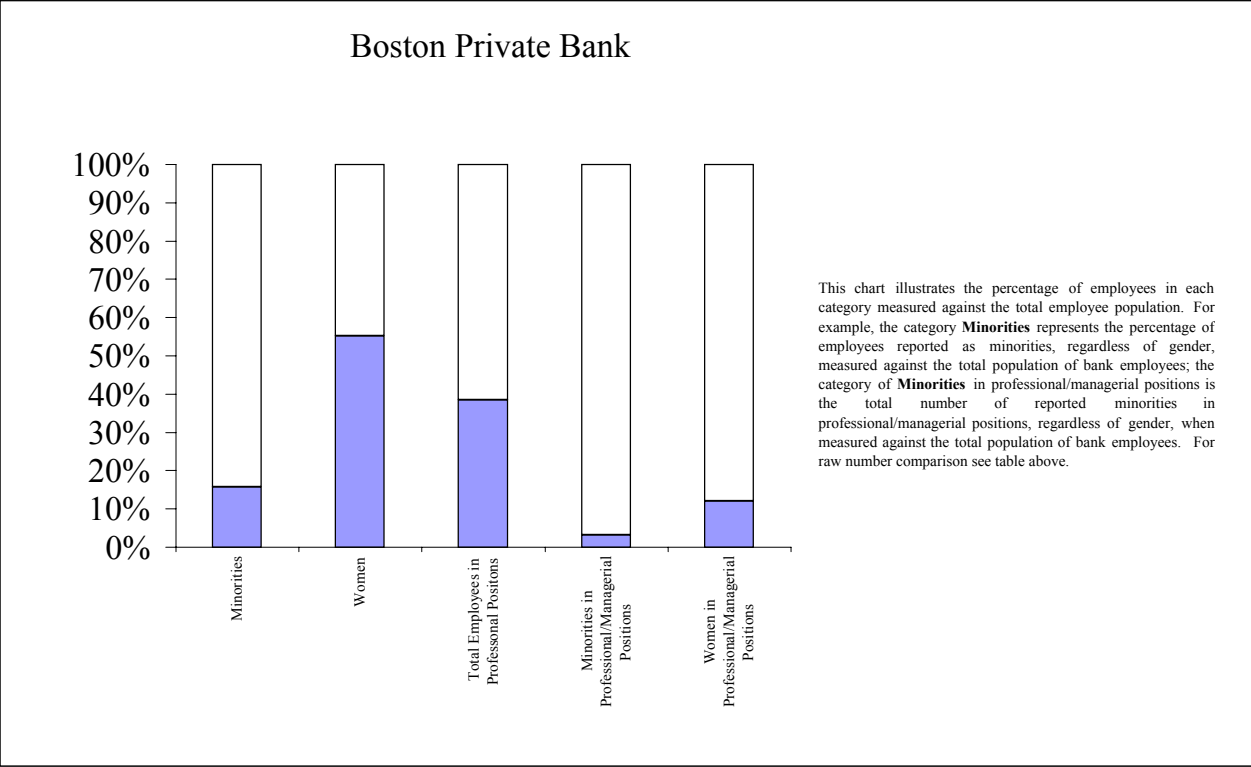
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	4	3.48%	4	4.71%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	50	23.70%	42	28.77%	2	25.00%	0	0.00%	4	40.00%	2	28.57%
Hispanic	15	8.11%	12	10.81%	0	0.00%	2	4.35%	1	5.56%	0	0.00%
White	10	0.58%	10	0.84%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	1	1.45%	0	0.00%	0	0.00%	0	0.00%	1	9.09%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	80	2.98%	68	3.89%	2	1.23%	2	0.39%	6	2.90%	2	4.17%

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 Employment Numbers

	Number of Employees	Percent of Total Employees
Total	190	
Minorities	30	16%
Women	105	55%
Total Employees In Professional Positions	73	38%
Minorities in Professional or Managerial Positions	6	3%
Women in Professional or Managerial Positions	23	12%





Century Bank & Trust



Century Bank

Banking for the New Century

Overview

Century Bank & Trust
400 Mystic Avenue
Medford, MA 02155

Description

Century Bank & Trust is a \$1.2 billion, community-focused, commercial bank, located in Medford, Massachusetts. The bank is a subsidiary of Century Bancorp, Inc.. Century Bank & Trust's primary focus is the origination of commercial and residential real estate loans, with particular emphasis on small to medium-size business lending.

Principal Officers

CEO

Marshall Sloan
400 Mystic Avenue
Medford, MA
781-391-4000

CFO

Paul Cusick, Jr.
400 Mystic Avenue
Medford, MA
7181-391-4000

Compliance Officer

Janet McElwee
400 Mystic Avenue
Medford, MA
781-391-4000

Employees

Number of Employees	346
Number of Employees in Massachusetts	346
Percentage of Women Employees	56.9%
Percentage of Minority Employees	13%

Branches

Number of Branches - Total	18
Branches Within Boston PSMA	2
Number of ATMs	19
Number of Free-Standing ATMs	1

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2002
Overall Rating	SATISFACTORY ³⁴
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	HIGH SATISFACTORY
Service Test Rating	LOW SATISFACTORY

³⁴Based on most recent CRA Performance Evaluation by FDIC published 2002.



Discussion

Overall rating: SATISFACTORY³⁵

Lending Test

Lending Test Rating: HIGH SATISFACTORY³⁶

General Responsiveness to Credit Needs

During the 1999 review it was noted that the residential lending activity of Century Bank & Trust had significantly declined during the period 1997 to 1998. This trend continued into 1999. HMDA-reportable loans dropped from 121 in 1997, to 30 in 1999. The management of Century Bank & Trust attributed this decline to a change in marketing focus and increased competition. HMDA applications decreased by one and HMDA originations decreased by 6 from the previous year. No low-income HMDA loans were reported in 2001.

In 2001 the bank's primary lending focus was the origination of small business loans. However, the total HMDA loans originated increased by 33 % between 2000 and 2001.

Responsiveness to Low and Moderate-Income Credit Needs

During the 1999 review it was noted that there existed a less-than-favorable relationship when low-income originations were compared to low-income households in the area. This discrepancy continued into 2001. A larger discrepancy was reported when comparing the percentage of loans for multi-family units in low-income census tracts, with the percentage of multi-family units in the low-income tracts.³⁷

Century Bank & Trust has instituted a First Time Home Buyer direct-mail program to attract applicants in low-income areas. The mailings have been successful in attracting applicants, however they have not resulted in an appreciable increase in borrowers.

³⁵ Based on most recent CRA Performance Evaluation by FDIC published 2002.

³⁶ Ibid.

³⁷ Ibid.

Leadership in Community Development Loans

During 2001, four qualified Community Development Loans were granted with a total dollar volume of \$6.5 million. This is a significant increase from the prior year and the prior evaluation period.

- In 2001, the bank provided 2 loans totaling \$5 million to a Lynn based business. The result of these loans was the preservation of employment opportunities in Lynn.
- 4 loans were originated in 2000 and 2001 for first and second phase construction of a 32-unit single-family dwelling in Tewksbury, Massachusetts. 25% of the units were set-aside for low and moderate-income borrowers.

Investment Test

Investment Test Rating: HIGH SATISFACTORY³⁸

Qualified equity investments represented 0.3% of total securities (\$590 million) as of December 31, 2001 (see Appendix A).

Service Test

Service Test Rating: LOW SATISFACTORY³⁹

Description Service Delivery Systems

2 of Century Bank & Trust's full-service branches are located in low-income census tracts and 4 are in moderate-income census tracts. The 2 branches opened in 2001 were opened in upper-income census tracts.

Century Bank & Trust offers to their customers the opportunity to Bank by Mail, and to use their 24-hour automated telephone information system known as the "Account Line." Century Bank & Trust is a member of the SUM ATM network and offers all standard channels of service to its customers.

Bilingual employees are available at every branch to serve the community members (more than 13 different languages). English/Spanish ATMs are also available.

³⁸ Ibid.

³⁹ Ibid.



Century Bank provides personalized sales and service during banking hours through their Telebanking Center and provides information about various banking services on their website, www.century-bank.com. Their Internet banking services include on-line bill payment services, known as "Express Pay".

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
275 Hanover Street Boston, MA 02113		✓
280 Atlantic Avenue Boston, MA 02110	✓	✓

FSB: Full Service Branch

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	50	57	55
HMDA Loans Originated	36	52	46
Low-Income Applications Received	1	1	0
Low-Income Loans Originated	1	1	0

HMDA-reportable applications received increased from 50 to 57 year-over-year, 1999 to 2000. Loans originated from this pool increased from 72% to 91%. Century Bank & Trust reported one low-income loan in both years. No low-income loans were reported in 2001. HMDA applications decreased by 1, and HMDA originations decreased by 6, from the previous year.

Small Business Loans

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Century Bank and Trust in the year 2001 is also compared to the 2001 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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.



Century Bank & Trust 2001 Qualified Investments

Name	Description	Beneficiary	Type	Amount
Access Capital Strategies Corp	Affordable Housing	Low-Mod Fund	Investment share value as of 11/30/2000	\$Continuing investments totaling \$1,500,000 to date.
Massachusetts Business Development Corporation' MassBusiness Capital Fund II	Stimulate economic growth and establish small businesses	Low-Mod	Loans	\$500,000 commitment.
Catholic Charities	Various	Low-and moderate Income Individuals	Grant	\$11,718.
Catholic Charities Inner City Scholarship Fund	Scholarships	Low-and moderate Income Individuals	Contribution	\$10,000.
The YMCA of Greater Boston	Pledge	Low-and moderate Income Individuals	Pledge	\$6,000
The Rodman Ride of Kids	Variety of Children's organizations	Low-and moderate Income Individuals	Contribution	\$4,000



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation, June 10, 2002.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System, 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates, March 2002.

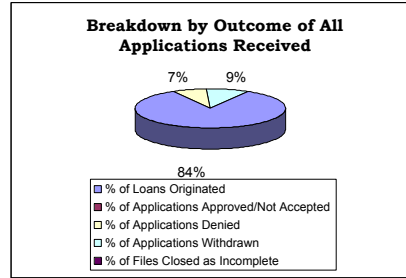
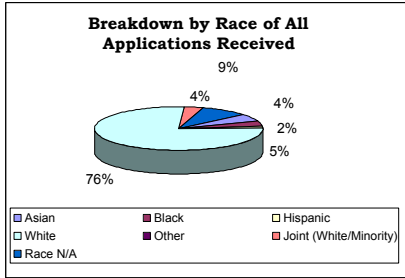
Century Bank website
<http://www.century-bank.com/>

Century Bank Lending Information - HMDA

2001

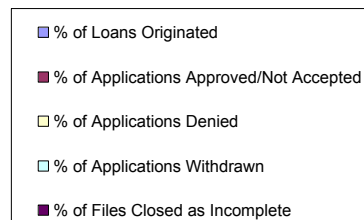
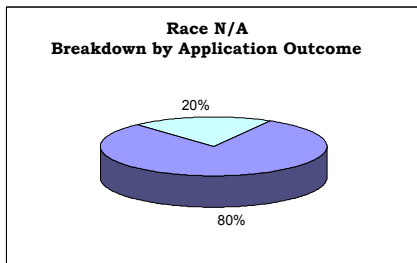
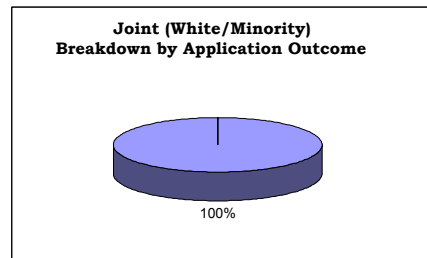
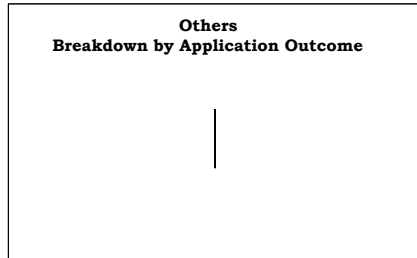
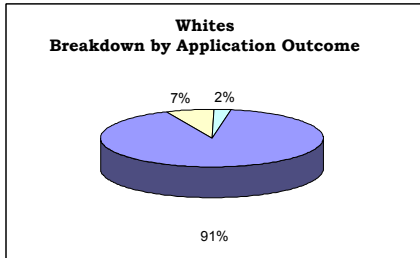
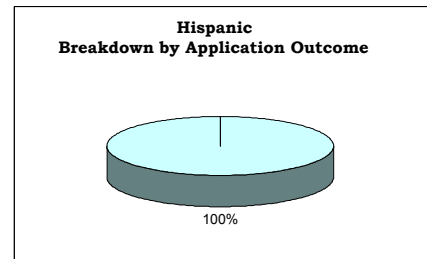
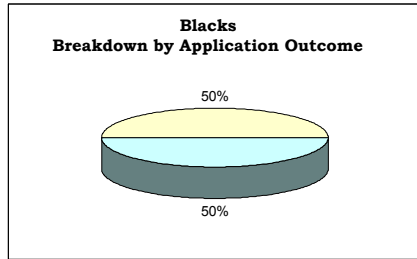
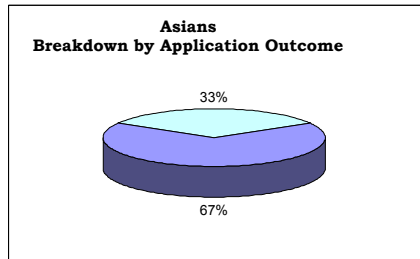
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	3	5%	2	67%	0	0%	0	0%	1	33%	0	0%
Black	2	4%	0	0%	0	0%	1	50%	1	50%	0	0%
Hispanic	1	2%	0	0%	0	0%	0	0%	1	100%	0	0%
White	42	76%	38	90%	0	0%	3	7%	1	2%	0	0%
Other	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	5	9%	4	80%	0	0%	0	0%	1	20%	0	0%
Total	55	100%	46	84%	0	0%	4	7%	5	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 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.

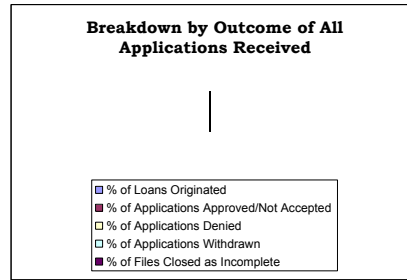
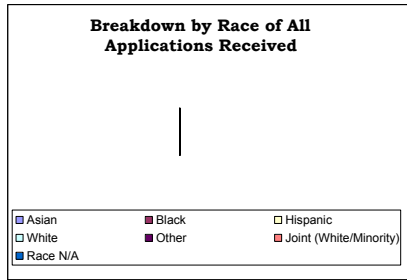


Century Bank Low-Income Mortgage Information

2001

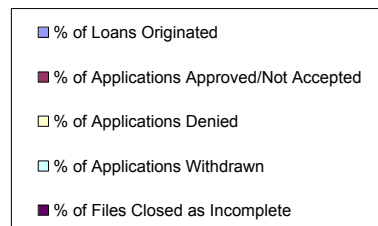
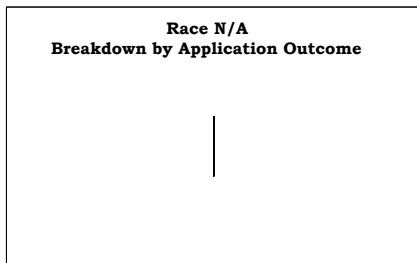
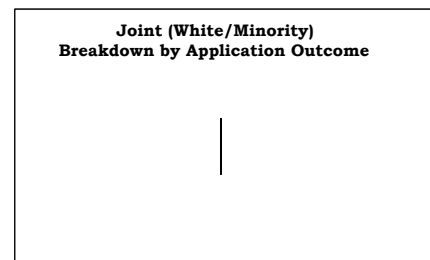
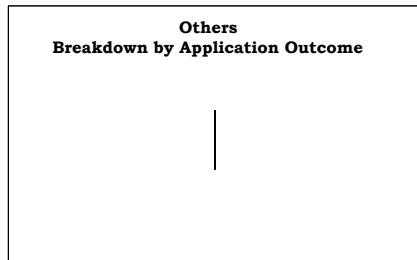
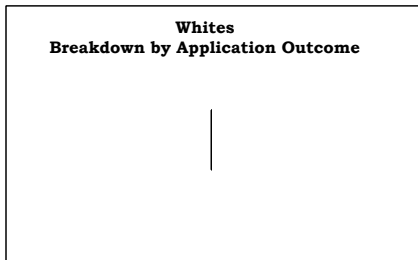
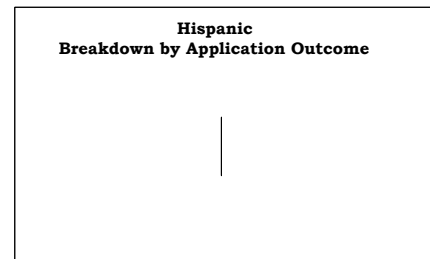
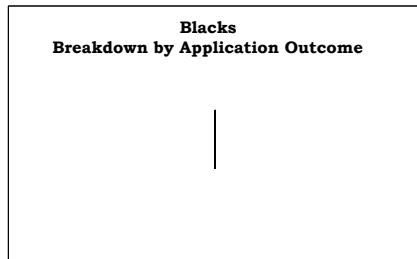
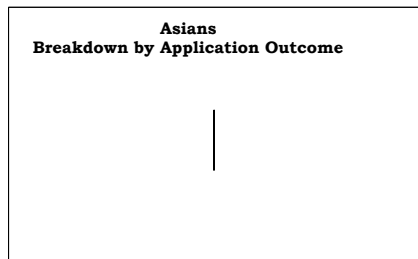
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	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%
Other	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 the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

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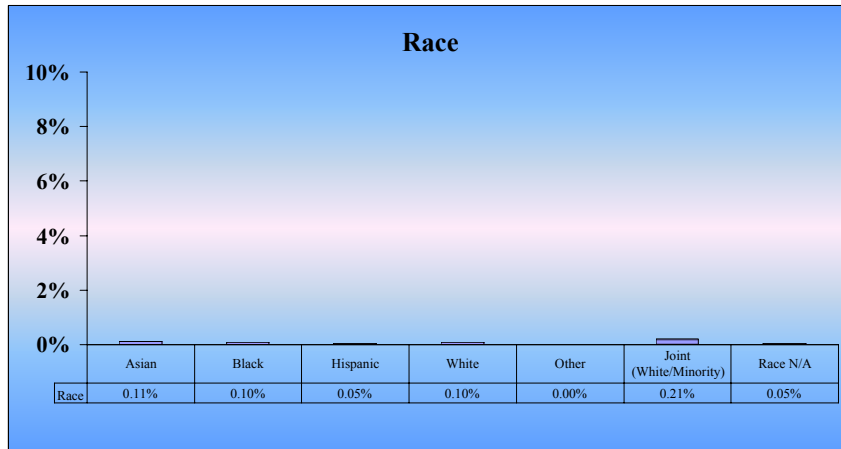
Compared against the MSA Aggregate Total

2001

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
Asian	3	0.11%	2	0.09%	0	0.00%	0	0.00%	1	0.63%	0	0.00%
Black	2	0.10%	0	0.00%	0	0.00%	1	0.27%	1	0.69%	0	0.00%
Hispanic	1	0.05%	0	0.00%	0	0.00%	0	0.00%	1	0.74%	0	0.00%
White	42	0.10%	38	0.11%	0	0.00%	3	0.11%	1	0.05%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	2	0.21%	2	0.27%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	5	0.05%	4	0.06%	0	0.00%	0	0.00%	1	0.10%	0	0.00%
Total	55	0.09%	46	0.10%	0	0.00%	4	0.08%	5	0.14%	0	0.00%

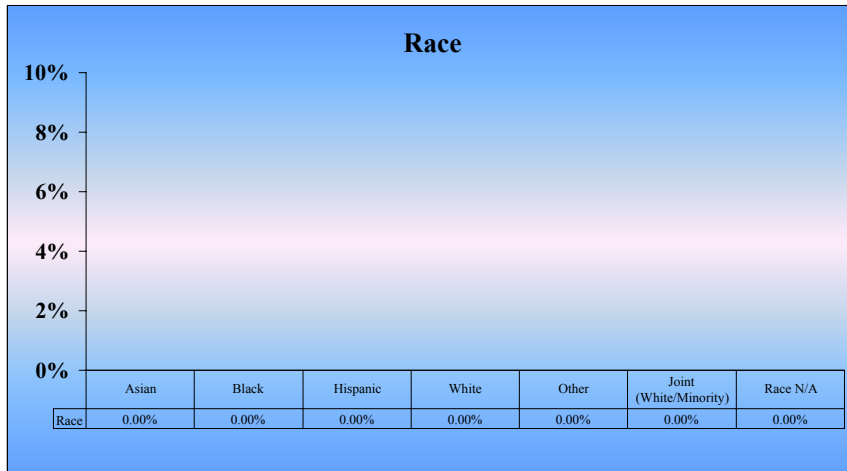
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

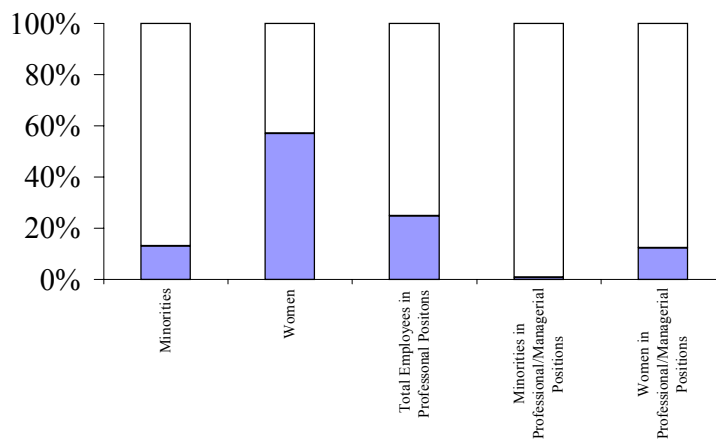
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Century Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	346	
Minorities	45	13%
Women	197	57%
Total Employees In Professional Positions	86	25%
Minorities in Professional or Managerial Positions	3	1%
Women in Professional or Managerial Positions	42	12%

Century Bank and Trust



This chart illustrates the percentage of employees in each category measured against the total employee population. For example, the category **Minorities** represents the percentage of employees reported as minorities, regardless of gender, measured against the total population of bank employees; the category of **Minorities** in professional/managerial positions is the total number of reported minorities in professional/managerial positions, regardless of gender, when measured against the total population of bank employees. For raw number comparison see table above.



Citizens Bank



Overview

Citizens Bank of Massachusetts
28 State Street
Boston, MA 02110

Description

Citizens Financial Group, Inc. is a \$50 billion commercial bank holding company headquartered in Providence, RI. It ranks among the nations 20 largest banks with more than 770 Citizens Bank branches, 1400 ATMs and over 12,000 employees in 7 New England and Mid-Atlantic states. Citizens Bank is wholly owned by The Royal Bank of Scotland Group plc.

In 2001 Citizens Bank acquired the retail division of Mellon Bank, adding 345 branches and \$16 billion in assets across several Mid-Atlantic States.

Principal Officers

President and CEO

Lawrence K. Fish
28 State Street
Boston, MA 02110
617-725-5800

Vice Chairman of the Board

Robert M Mahoney
28 State Street
Boston, MA 02110
617-725-5800

President & CEO, Citizens Bank of Massachusetts

Thomas J. Hollister
28 State Street
Boston, MA 02110
617-725-5800

Employees

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

Branches

Number of Branches - Total	772
Branches Within Boston PSMA	34
Number of ATMs	1400
Number of Free-Standing ATMs	NA

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999
Overall Rating	OUTSTANDING ⁴⁰
Lending Test Rating	OUTSTANDING ⁴¹
Investment Test Rating	HIGH
Service Test Rating	SATISFACTORY ⁴²
	OUTSTANDING ⁴³

⁴⁰ Based on most recent CRA Performance Evaluation published by FDIC published 1999.

⁴¹ Ibid.

⁴² Ibid.

⁴³ Ibid.



Discussion

Overall rating: OUTSTANDING⁴⁴

Lending Test

Lending Test Rating: OUTSTANDING⁴⁵

General Responsiveness to Credit Needs

Citizens Bank of Massachusetts (CBM) is committed to providing affordable housing throughout the assessment areas. This is evidenced by the innovative and flexible mortgage products it offers, as well as the level of community-development lending in which it is engaged.

The distribution of loans to borrowers in low and moderate-income census tracts is much better than expected given the demographics and lending requirements.

Responsiveness to Low and Moderate-Income Credit Needs

The 1999 CRA report noted the innovative and flexible lending programs provided by Citizens Bank of Massachusetts. These programs were viewed as evidence of the bank's commitment to providing affordable housing to residents throughout its assessment area.

From 1999 to 2000, there was a significant increase in the number of applications received for HMDA and low-income loans. Even though the number of applicants in each group rose, the percentage of loans originated decreased.

In 2001, the total number of HMDA applications received increased significantly (from 180 to 219) however the number of loans originated decreased by three. The number of low-income loans received increased from 15 to 23 but the percentage of low-income loans originated decreased from 40% to 30%.

CBM participates in the following residential mortgage programs:

- Soft Second Program
- ACORN

- Citizens Flex Mortgage
- Appleseed
- New Citizens Immigrant Initiative
- Citizen's Bank of Massachusetts Down Payment and Closing Cost Assistance
- Boston Home Certificate Initiative
- Community Homebuyer Program/House Boston

Leadership in Community Development Loans

Citizens Bank of Massachusetts originates a significant level of community development loans. The FDIC reported the following community development loans in 1999:

- \$4,100,000 – renovation of a 26-bed rest home and its conversion to a 40-unit assisted living facility.
- \$3,620,000 – construction loan for 1,500-space parking lot to ease the burden from the loss of 2,000 parking spaces at Logan Airport after the completion of the Ted Williams Tunnel.
- \$250,000 – Proceeds were used to provide working capital for a community-based, non-profit organization that provides services to battered woman and their children.
- \$200,000 – Proceeds were used to provide affordable home improvement loans to the residents of East Boston.
- \$150,000 – Proceeds were used to meet the working capital needs of a community-based, non-profit agency that works with the Roxbury District Court.
- \$100,000 – Proceeds were used to provide a working capital line of credit for a community-based, non-profit organization.

Investment Test

Investment Test Rating: HIGH SATISFACTORY⁴⁶

Many of Citizens Bank of Massachusetts investments are directed at Boston inner-city neighborhoods, low and moderate-income, and minority areas. The bank is involved in the Massachusetts Housing Equity Fund (MHEF), which provides affordable housing in the Greater Boston Area, and the Massachusetts Housing Partnership Fund (MHP) which was established by state statute to ensure that community-based

⁴⁴ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁴⁵ Ibid.

⁴⁶ Ibid.



and affordable housing lending was performed at low cost.

Service Test

Service Test Rating: OUTSTANDING ⁴⁷

Description of Service Delivery Systems

Over the past 8 years, Citizens Bank of Massachusetts has extended its commitment to making banking convenient for their customers. Through growth and acquisitions, their retail banking franchise has grown from 56 branches in and around Rhode Island, to a full-service network of more than 770 retail and in-store branch offices, and 1,400 ATMs throughout their seven-state market. Citizens Bank acquired the retail branch network of Mellon Bank in December of 2001.

Branch-based business banking officers are active in communities, meeting the needs of small business customers.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
2343 Washington Street Boston, MA		✓
20 Tremont Street Boston, MA	✓	
73 Tremont Street Boston, MA		✓
55 Summer Street Boston, MA		✓
One Financial Center Boston, MA		✓
26 Central Square East Boston, MA		✓
217 Adams Street Dorchester, MA		✓
568 Columbia Road Dorchester, MA		✓
1628 Tremont Street Boston, MA		✓
569 Washington Street Dorchester, MA		✓
315 Hanover Street Boston, MA		✓
1575 Blue Hill Avenue Mattapan, MA		✓
200 Summer Street Boston, MA	✓	
One Deaconess Way Boston, MA	✓	
33 Kilmarnock Street Boston, MA	✓	
300 Terminal C East Boston, MA	✓	

FSB: Full Service Branch

Special Programs

CBM is involved in the following Community Development Services within Greater Boston:

- Neighborhood of Affordable Housing (NOAH)
- Association For Community Reform Now (ACORN)
- City Life / Vida Urbana
- Urban Edge
- Roslindale Village – A Boston Main Street Initiative
- Action for Community Development (ABCD)

⁴⁷ Based on most recent CRA Performance Evaluation by FDIC published 1999.



Additional Information

Citizens Financial Group was named the Small Business Association's "New England Regional Lender of the Year" for 2001.

This was the third year (1998, 1999, 2001) that Citizens Financial Group was the #1 originator of SBA loans in New England.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	77	180	219
HMDA Loans Originated	67	108	105
Low-Income Applications Received	5	15	23
Low-Income Loans Originated	3	6	7

From 1999 to 2000, there was a significant increase in the number of applications received for HMDA and low-income loans. Even though the number of applicants in each group rose, the percentage of loans originated decreased. This trend continued into 2001. Although applications were received in both groups, loans originated either decreased or increased marginally.

Small Business Loans

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Citizens Bank of Massachusetts in the year 2001 is also compared to the 2001 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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank 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 Deposit Insurance
Corporation; October 12, 1999.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of Governors of the
Federal Reserve System; 2001.

2000 Linked Deposit Report To the Mayor of the
City of Boston, NobleAssociates; March 2002.

Citizens Bank Annual Report; 2001.

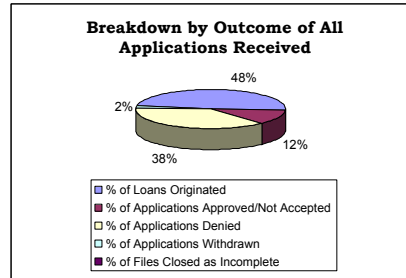
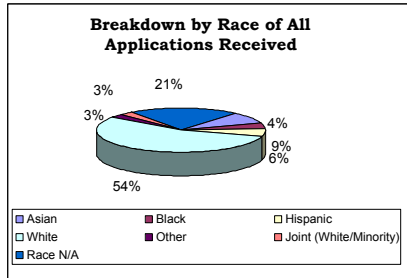
Citizens Bank website
<http://www.citizensbank.com/>

Citizens Bank Lending Information - HMDA

2001

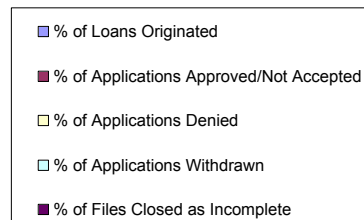
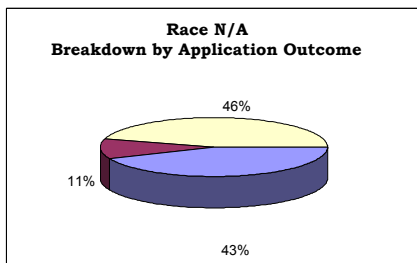
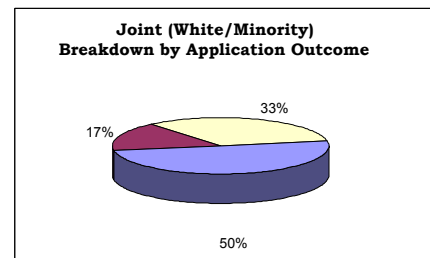
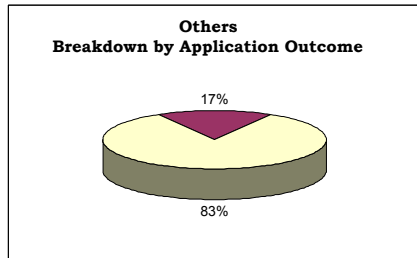
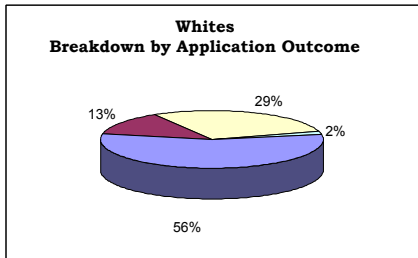
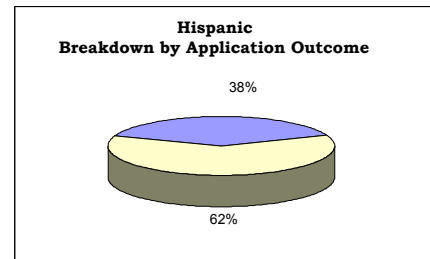
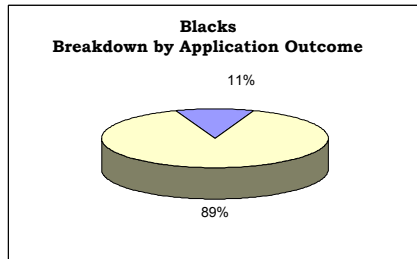
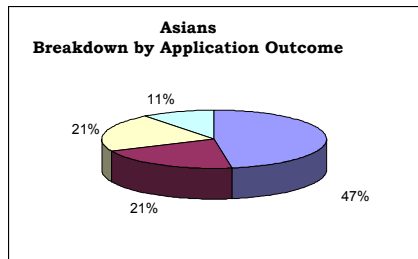
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	19	9%	9	47%	4	21%	4	21%	2	11%	0	0%
Black	9	4%	1	11%	0	0%	8	89%	0	0%	0	0%
Hispanic	13	6%	5	38%	0	0%	8	62%	0	0%	0	0%
White	120	55%	67	56%	16	13%	35	29%	2	2%	0	0%
Other	6	3%	0	0%	1	17%	5	83%	0	0%	0	0%
Joint (White/Minority)	6	3%	3	50%	1	17%	2	33%	0	0%	0	0%
Race N/A	46	21%	20	43%	5	11%	21	46%	0	0%	0	0%
Total	219	100%	105	48%	27	12%	83	38%	4	2%	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 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.

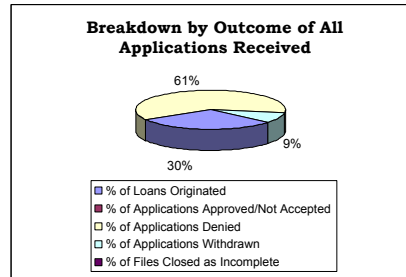
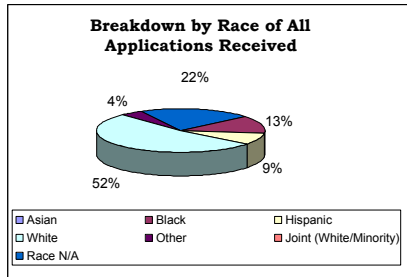


Citizens Bank Low-Income Mortgage Information

2001

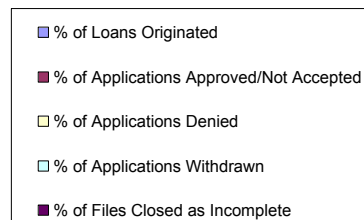
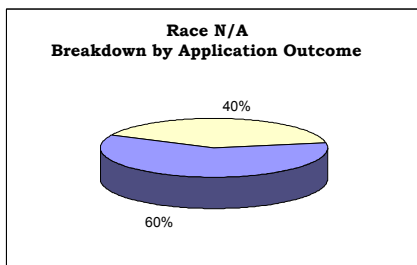
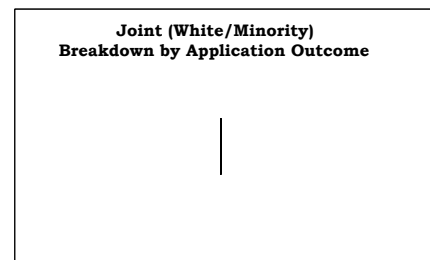
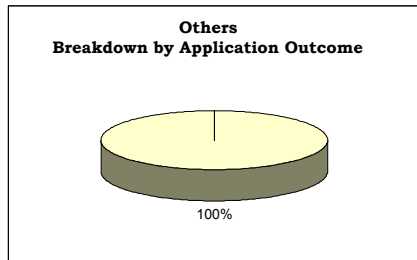
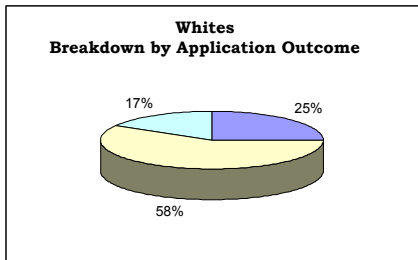
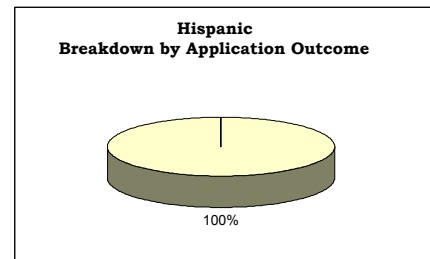
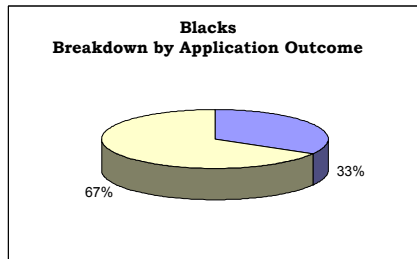
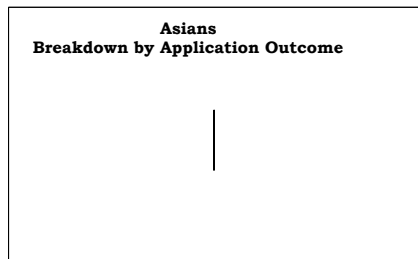
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Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	3	13%	1	33%	0	0%	2	67%	0	0%	0	0%
Hispanic	2	9%	0	0%	0	0%	2	100%	0	0%	0	0%
White	12	52%	3	25%	0	0%	7	58%	2	17%	0	0%
Other	1	4%	0	0%	0	0%	1	100%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	5	22%	3	60%	0	0%	2	40%	0	0%	0	0%
Total	23	100%	7	30%	0	0%	14	61%	2	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 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.



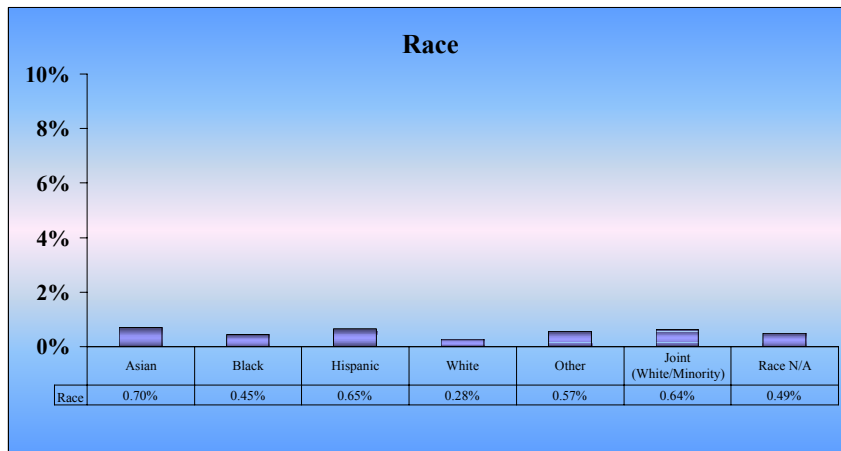
Compared against the MSA Aggregate Total

2001

Citizens 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
Asian	19	0.70%	9	0.43%	4	1.86%	4	1.87%	2	1.25%	0	0.00%
Black	9	0.45%	1	0.08%	0	0.00%	8	2.14%	0	0.00%	0	0.00%
Hispanic	13	0.65%	5	0.36%	0	0.00%	8	2.56%	0	0.00%	0	0.00%
White	120	0.28%	67	0.20%	16	0.48%	35	1.24%	2	0.10%	0	0.00%
Other	6	0.57%	0	0.00%	1	1.41%	5	3.85%	0	0.00%	0	0.00%
Joint (White/Minority)	6	0.64%	3	0.40%	1	1.41%	2	3.45%	0	0.00%	0	0.00%
Race N/A	46	0.49%	20	0.31%	5	0.54%	21	2.26%	0	0.00%	0	0.00%
Total	219	0.36%	105	0.22%	27	0.55%	83	1.71%	4	0.11%	0	0.00%

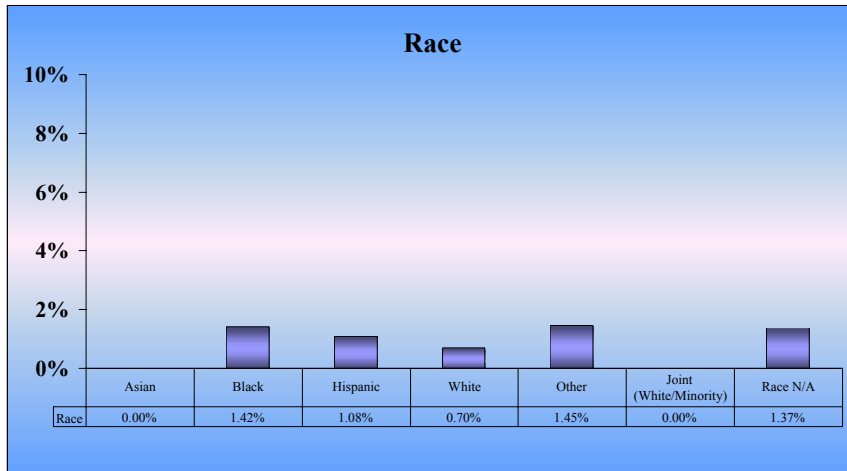
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Citizens 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
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	3	1.42%	1	0.68%	0	0.00%	2	5.00%	0	0.00%	0	0.00%
Hispanic	2	1.08%	0	0.00%	0	0.00%	2	4.35%	0	0.00%	0	0.00%
White	12	0.70%	3	0.25%	0	0.00%	7	2.38%	2	1.71%	0	0.00%
Other	1	1.45%	0	0.00%	0	0.00%	1	4.55%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	5	1.37%	3	1.66%	0	0.00%	2	2.04%	0	0.00%	0	0.00%
Total	23	0.86%	7	0.40%	0	0.00%	14	2.70%	2	0.97%	0	0.00%

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



East Boston Savings Bank

**East Boston Savings Bank[®]****Overview**

East Boston Savings Bank
10 Meridian Street
East Boston, MA 02128

Description

East Boston Savings Bank, located in East Boston, is a subsidiary of Meridian Mutual Holding Company. East Boston Savings Bank is a \$625 million community bank. East Boston Savings Bank's primary focus is the origination of residential mortgage loans.

Principal Officers**CEO**

Paul Verdonck
10 Meridian Street
East Boston, MA
617-567-1500

CFO

Leodard Siuda
10 Meridian Street
East Boston, MA
617-567-1500

EVP Compliance Officer

Philip Freehan
10 Meridian Street
East Boston, MA
617-567-1500

Employees

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

Branches

Number of Branches - Total	7
Branches Within Boston PSMA	7
Number of ATMs	11
Number of Free-Standing ATMs	4

CRA Rating

Rating Agency	Massachusetts Division of Banks
Most Recent Rating	2002
Overall Rating	OUTSTANDING ⁴⁸
Lending Test Rating	OUTSTANDING
Investment Test Rating	SATISFACTORY
Service Test Rating	OUTSTANDING

⁴⁸ Based on most recent CRA Performance Evaluation by Massachusetts Division of Banks published 2002.



Discussion

Overall rating: OUTSTANDING⁴⁹

Lending Test

Lending Test Rating: OUTSTANDING⁵⁰

East Boston Savings Bank continues to exhibit a good penetration of loans among borrowers of different levels, particularly low and moderate-income borrowers. Again in 2001, the number of loans made to low and moderate-income borrowers has been consistently higher than that of the aggregate.

General Responsiveness to Credit Needs

East Boston Savings Bank's lending activity to moderate-income individuals remained stable.

Responsiveness to Low and Moderate-Income Credit Needs

Within its assessment area, East Boston Savings Bank maintains a good market share of low- and moderate-income originations against its competition.

Applications and originations for low-income mortgages at East Boston Savings Bank increased over 60% from 1999 to 2000.⁵¹ However, 2001 saw a slight decrease in applications received for HMDA-reportable, and low-income loans.

East Boston Savings Bank participated in several in-house sponsored and federal, state and locally funded mortgage assistance and homebuyers programs to benefit low-income borrowers.

Leadership in Community Development Loans

As referenced in the 2002 report generated by the Massachusetts Division of Banks, East Boston Savings Bank had originated 5 community development loans during 2001.

The following is a listing of the Community/Economic Loans generated by East Boston Savings Bank in the year 2001:

- CDC loan of \$2 million for specialty care services for the residents of East Boston.
- A \$620,000 commercial mortgage and collateral for an organization that operates outpatient services for drug abuse and mental health patients.
- CDC term note of \$200,000 providing temporary financing for the completion of a 15-unit housing development for the elderly in East Boston.
- Second mortgage of \$100,000 for the reimbursement of renovation expenses in a 12-family apartment building in Revere.
- Unsecured line of credit of \$50,000 for a CDC organization in East Boston.

Investment Test

Investment Test Rating: SATISFACTORY⁵²

As of December 31, 2001, out of a total investment portfolio of \$228 million, one million dollars was considered to be a qualified investment.

Service Test

Service Test Rating: OUTSTANDING⁵³

Description Service Delivery Systems

Retail services are accessible to all portions of the bank's assessment area. Five of the offices listed below are located in the bank's low and moderate-income areas.

East Boston Savings Bank provides 24-hour banking with East Boston Savings Bank-Online internet banking. They also provide 24-hour access to account information via their 'Easy Access Line' telephone banking service. The bank also has a website; www.ebsb.com. There are two loan centers: 1150 Saratoga Street, East Boston, MA 02128; and Lynnfield Woods Mortgage Center, 220 Broadway, Lynnfield, MA 01940.

⁴⁹ Based on most recent CRA Performance Evaluation by Massachusetts Division of Banks published 2002.

⁵⁰ Ibid.

⁵¹ FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

⁵² Based on most recent CRA Performance Evaluation by Massachusetts Division of Banks published 2002.

⁵³ Ibid.

**Branch Information:**

Branch locations in the Boston MSA:

Location	ATM	FSB
Ten Meridian Street East Boston 02128		✓
One Bennington Street East Boston 02128	✓	✓
856 Bennington Street East Boston 02128	✓	✓
575 Broadway Revere 02151	✓	✓
Logan Airport East Boston 02128	✓	
Logan Airport East Boston 02128	✓	
294 Bennington Street East Boston 02128	✓	

FSB: Full Service Branch

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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	184	220	202
HMDA Loans Originated	146	173	153
Low-Income Applications Received	15	23	20
Low-Income Loans Originated	11	17	16

Applications and originations for low-income mortgages at East Boston Savings Bank increased by over 60% from 1999 to 2000. HMDA loan applications and originations increased by roughly 20% in the same period. Although the numbers decreased for the year 2001 in all areas listed above, the overall increase in recent years is considerable. CRA ratings for East Boston Savings Bank improved since the previous 1999 report.

Small Business Loans

Please refer to the addendum The 2001 Linked Deposit Bank 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 2001 is also compared to the 2001 Aggregate small



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; November 13, 1999.

Community Reinvestment Act Performance
Evaluation, Massachusetts Division of Banks,
January 22, 2002.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

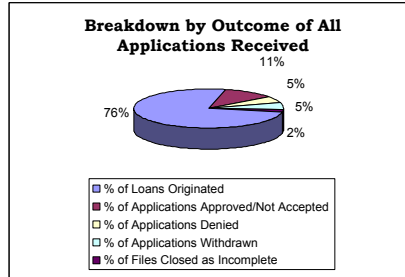
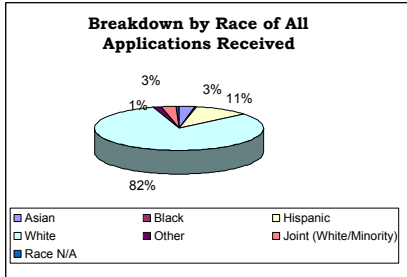
East Boston Savings Bank website
<http://www.ebsb.com/>

East Boston Savings Bank Lending Information - HMDA

2001

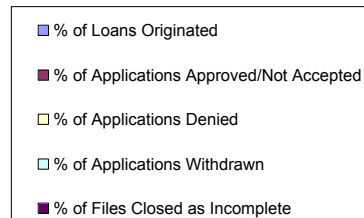
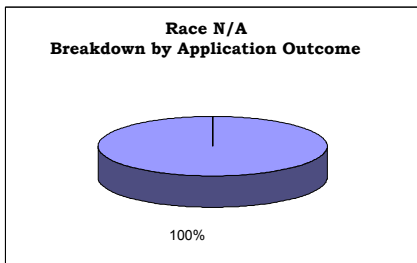
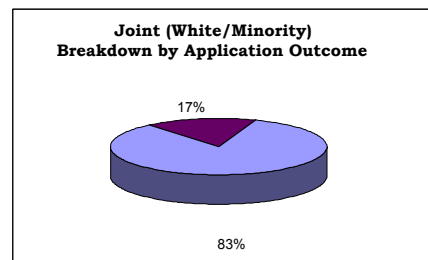
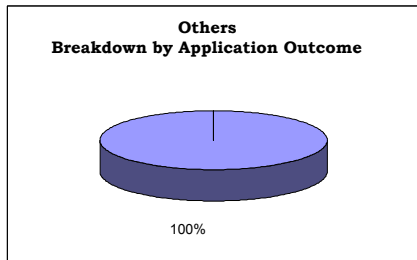
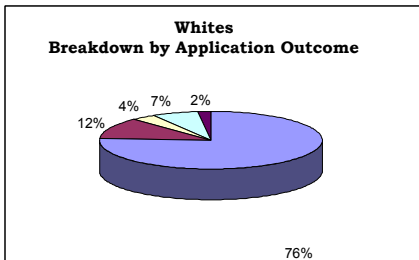
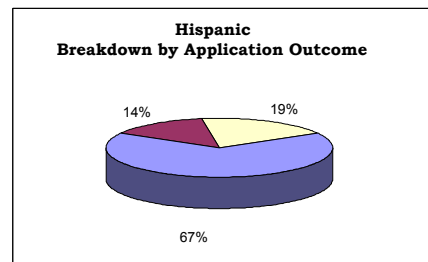
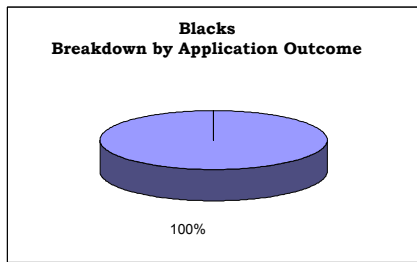
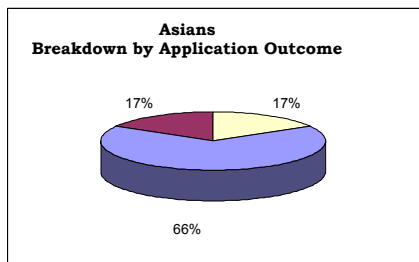
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	6	3%	4	67%	1	17%	1	17%	0	0%	0	0%
Black	1	0%	1	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	21	10%	14	67%	3	14%	4	19%	0	0%	0	0%
White	164	81%	125	76%	19	12%	6	4%	11	7%	3	2%
Other	3	1%	3	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	6	3%	5	83%	0	0%	0	0%	0	0%	1	17%
Race N/A	1	0%	1	100%	0	0%	0	0%	0	0%	0	0%
Total	202	100%	153	76%	23	11%	11	5%	11	5%	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 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.

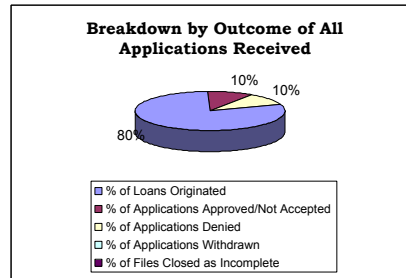
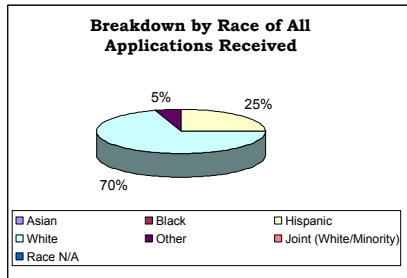


East Boston Savings Bank Low-Income Mortgage Information

2001

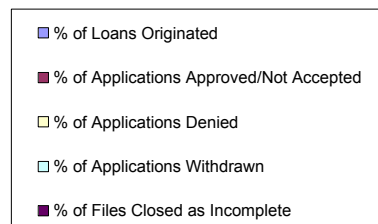
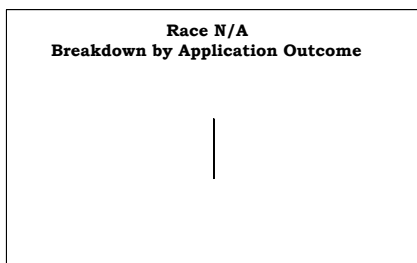
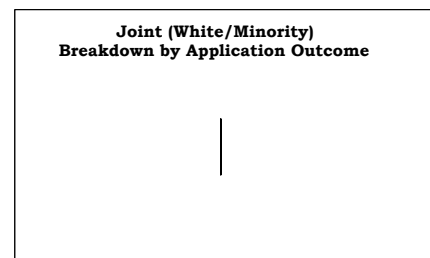
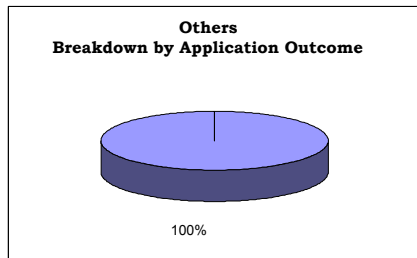
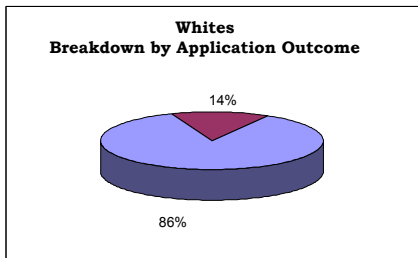
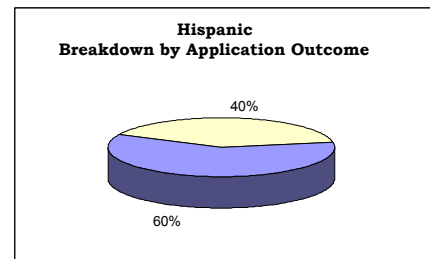
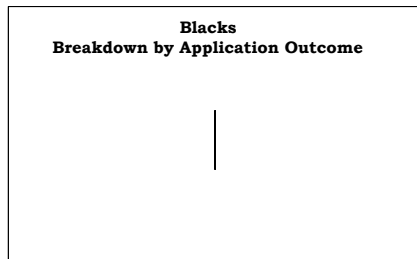
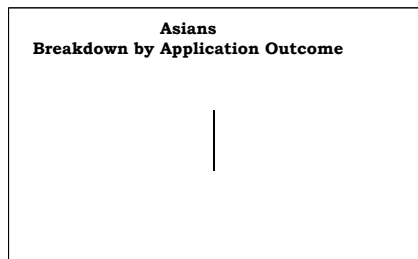
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	5	25%	3	60%	0	0%	2	40%	0	0%	0	0%
White	14	70%	12	86%	2	14%	0	0%	0	0%	0	0%
Other	1	5%	1	100%	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	20	100%	16	80%	2	10%	2	10%	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 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.



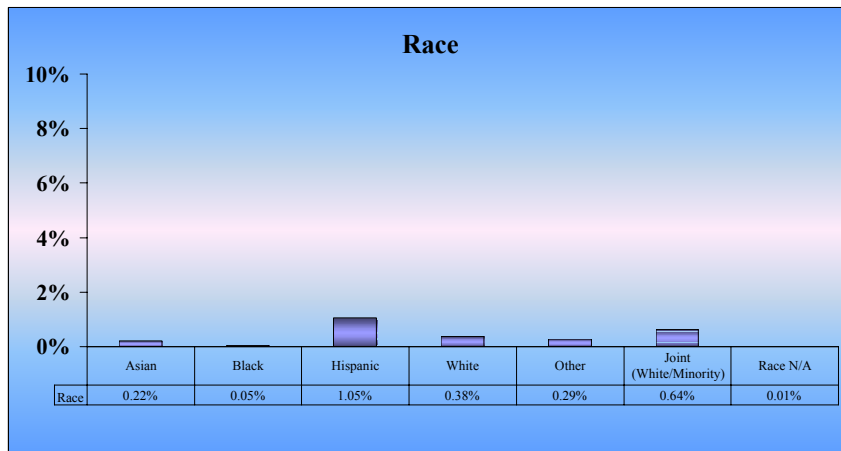
Compared against the MSA Aggregate Total

2001

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
Asian	6	0.22%	4	0.19%	1	0.47%	1	0.47%	0	0.00%	0	0.00%
Black	1	0.05%	1	0.08%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	21	1.05%	14	1.01%	3	2.29%	4	1.28%	0	0.00%	0	0.00%
White	164	0.38%	125	0.36%	19	0.57%	6	0.21%	11	0.53%	3	0.62%
Other	3	0.29%	3	0.40%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	6	0.64%	5	0.67%	0	0.00%	0	0.00%	0	0.00%	1	5.88%
Race N/A	1	0.01%	1	0.02%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	202	0.33%	153	0.33%	23	0.47%	11	0.23%	11	0.30%	4	0.51%

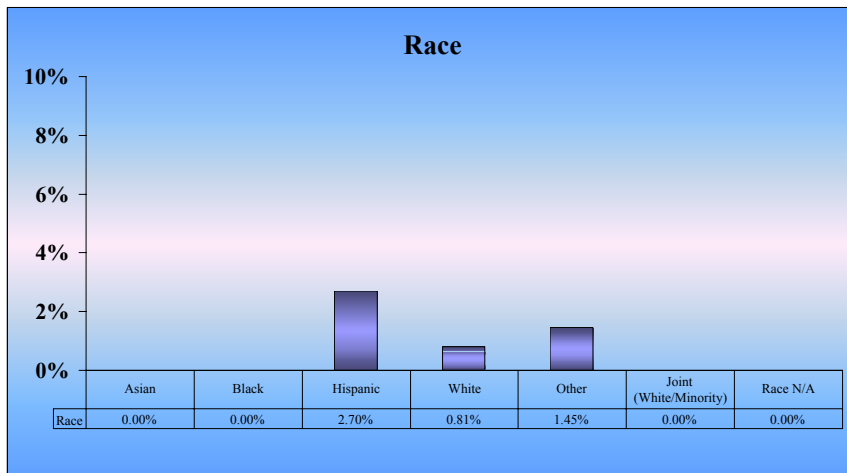
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	5	2.70%	3	2.70%	0	0.00%	2	4.35%	0	0.00%	0	0.00%
White	14	0.81%	12	1.01%	2	1.90%	0	0.00%	0	0.00%	0	0.00%
Other	1	1.45%	1	3.23%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	20	0.74%	16	0.91%	2	1.23%	2	0.39%	0	0.00%	0	0.00%

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



Overview

Eastern Bank & Trust
53 State Street
Boston, MA 02109

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. With \$3.8 billion in assets, Eastern Bank is headquartered in Boston and maintains regional offices in Lynn, Salem, Malden, Saugus and Quincy. Eastern Bank's primary business focus is residential real estate lending, commercial lending, commercial real estate lending, and consumer lending.

Principal Officers

CEO

Stanley Lukowski
53 State Street
Boston, MA
617-263-2402

CFO

Bryan Texeira
1 Eastern Place
Lynn, MA
781-598-7831

Chief Compliance Officer

Kevin Shea
1 Eastern Place
Lynn, MA
781-598-8545

Employees

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

Branches

Number of Branches - Total	48
Branches within Boston PSMA	1
Number of ATMs	51
Number of Free-Standing ATMs	4

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2001
Overall Rating	OUTSTANDING
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING



Discussion

Overall rating: OUTSTANDING⁵⁴

Lending Test

Lending Test Rating: OUTSTANDING⁵⁵

General Responsiveness to Credit Needs

Eastern Bank's residential and small business lending activity reflects a very good level of responsiveness to assessment area credit needs, based on the size of the bank, the composition of its loan portfolio, and the significant level of competition within its assessment area.⁵⁶

Responsiveness to Low and Moderate-Income Credit Needs

The distribution of HMDA-reportable loans by borrower income, as compared to aggregate data, and the dispersion of households within the assessment area, demonstrates that Eastern Bank has been successful in extending credit to borrowers of all income levels, particularly to low and moderate-income borrowers.⁵⁷

Leadership in Community Development Loans

The quality and type of community-development loans made is reflective of an above-average commitment to the spirit of the Community Reinvestment Act. The geographic distribution of the loans adequately penetrated the bank's assessment area, specifically low and moderate-income areas, as well as areas that have been targeted for economic development.⁵⁸

Investment Test

Lending Test Rating: OUTSTANDING⁵⁹

Eastern Bank has improved its Investment Test rating to Outstanding in 2001 from a rating of Low Satisfactory in 1999. Eastern Bank is now seen as asserting a leadership position of meeting

the credit and community-development needs in its assessment area.

Service Test

Lending Test Rating: OUTSTANDING⁶⁰

Description Service Delivery Systems

Eastern Bank's delivery of retail services and their management's commitment to the community reflect a strong response to the needs of the assessment area. Eastern Bank provides alternative banking systems to better meet the differing needs of its customers. Eastern Bank also demonstrates a high level of community development services.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
101 Federal Street Boston, MA 02110	✓	✓
470 West Broadway S. Boston, MA 02127	✓	✓

FSB: Full Service Branch

Corporate Headquarters:

Exchange Place
53 State Street
Boston, MA 02109

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	554	558	512
HMDA Loans Originated	437	459	427
Low-Income Applications Received	77	51	41
Low-Income Loans Originated	46	33	28

The number of low-income mortgage applications dropped from 77 in 1999, to 51 in 2000. Between 2000 and 2001 loans dropped for all areas noted above.

⁵⁴ Based on most recent CRA Performance Evaluation published by FDIC 2001.

⁵⁵ Ibid.

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ Ibid.

⁵⁹ Ibid.

⁶⁰ Ibid.



Small Business Loans

Please refer to the addendum The 2001 Linked Deposit Bank 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 2001 is also compared to the 2001 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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank 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 Deposit Insurance
Corporation; December 3, 2001.

Massachusetts Division of Banks, Summary
Information for State Chartered Banks and
Credit Unions. <http://db.state.ma.us/dob/in-choose.asp>

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

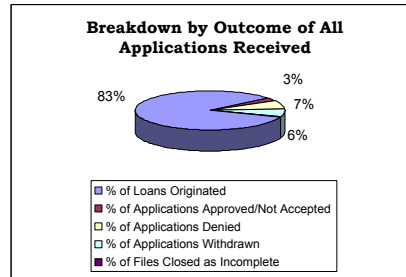
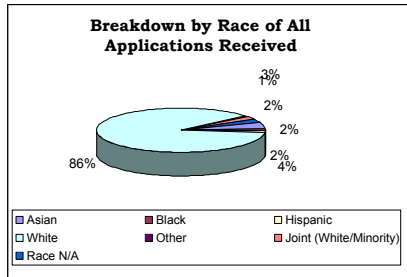
Eastern Bank website
<http://www.easternbank.com/>

Eastern Bank Lending Information - HMDA

2001

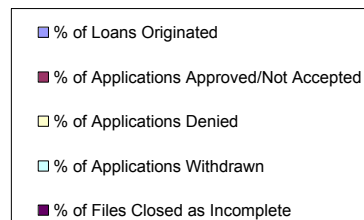
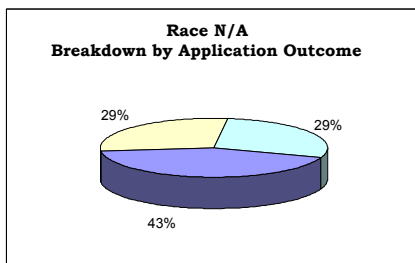
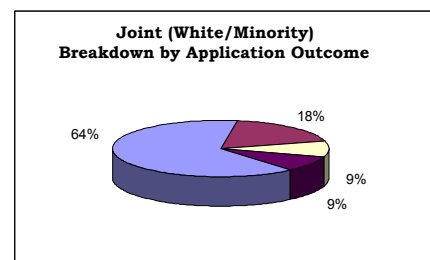
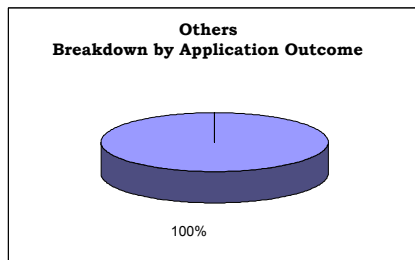
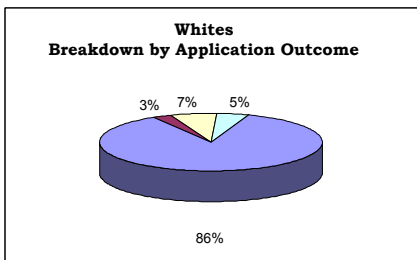
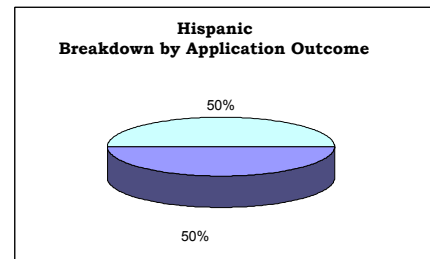
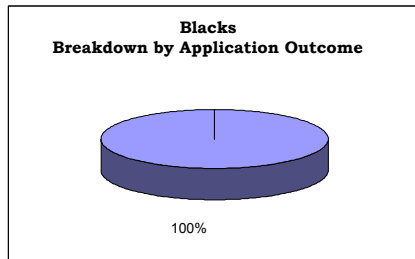
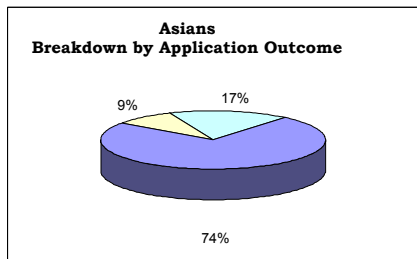
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	23	4%	17	74%	0	0%	2	9%	4	17%	0	0%
Black	8	2%	8	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	8	2%	4	50%	0	0%	0	0%	4	50%	0	0%
White	443	87%	380	86%	13	3%	29	7%	21	5%	0	0%
Other	5	1%	5	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	11	2%	7	64%	2	18%	1	9%	0	0%	1	9%
Race N/A	14	3%	6	43%	0	0%	4	29%	4	29%	0	0%
Total	512	100%	427	83%	15	3%	36	7%	33	6%	1	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 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.

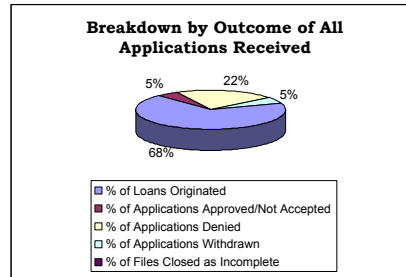
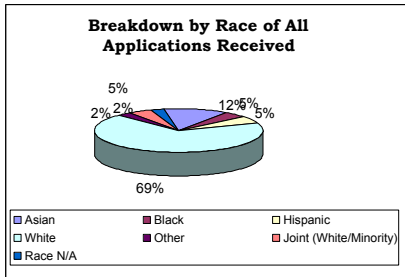


Eastern Bank Low-Income Mortgage Information

2001

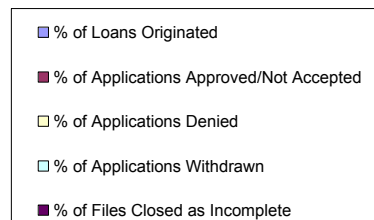
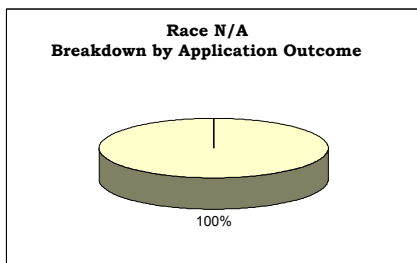
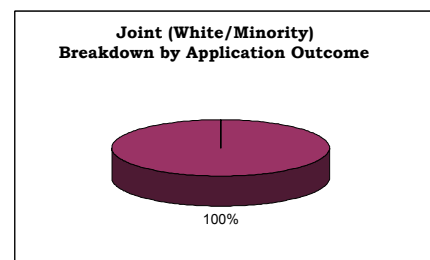
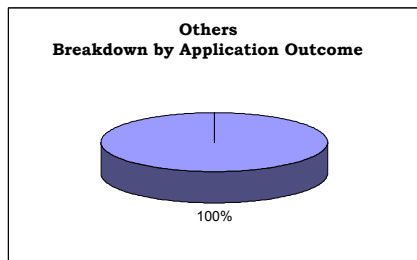
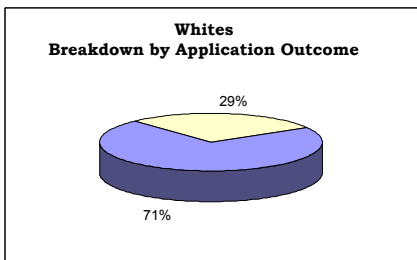
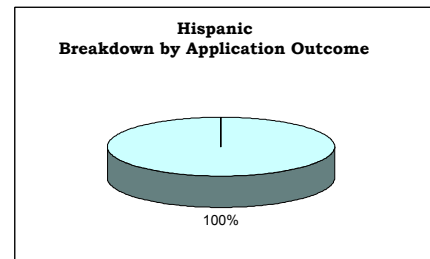
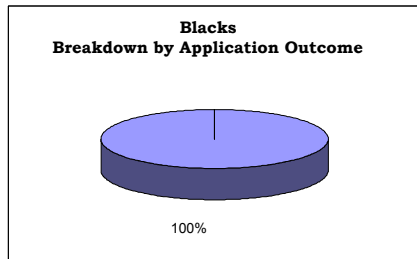
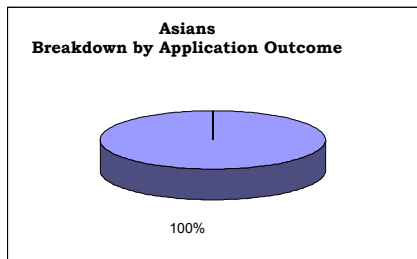
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	5	12%	5	100%	0	0%	0	0%	0	0%	0	0%
Black	2	5%	2	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	2	5%	0	0%	0	0%	0	0%	2	100%	0	0%
White	28	68%	20	71%	0	0%	8	29%	0	0%	0	0%
Other	1	2%	1	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	5%	0	0%	2	100%	0	0%	0	0%	0	0%
Race N/A	1	2%	0	0%	0	0%	1	100%	0	0%	0	0%
Total	41	100%	28	68%	2	5%	9	22%	2	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 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.



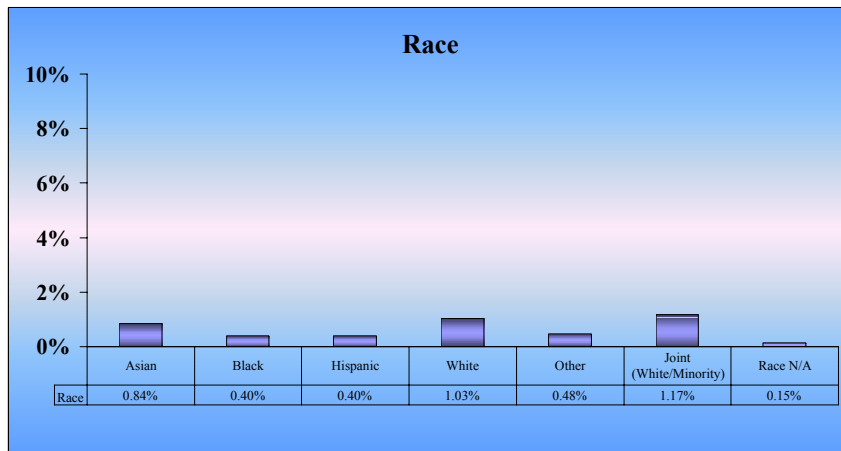
Compared against the MSA Aggregate Total

2001

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
Asian	23	0.84%	17	0.80%	0	0.00%	2	0.93%	4	2.50%	0	0.00%
Black	8	0.40%	8	0.63%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	8	0.40%	4	0.29%	0	0.00%	0	0.00%	4	2.94%	0	0.00%
White	443	1.03%	380	1.11%	13	0.39%	29	1.02%	21	1.01%	0	0.00%
Other	5	0.48%	5	0.67%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	11	1.17%	7	0.94%	2	2.82%	1	1.72%	0	0.00%	1	5.88%
Race N/A	14	0.15%	6	0.09%	0	0.00%	4	0.43%	4	0.41%	0	0.00%
Total	512	0.84%	427	0.91%	15	0.31%	36	0.74%	33	0.91%	1	0.13%

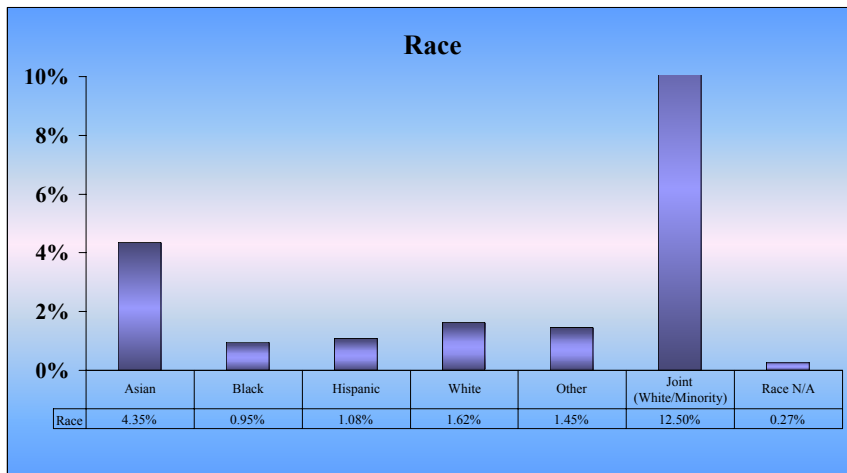
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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
Asian	5	4.35%	5	5.88%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	2	0.95%	2	1.37%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	2	1.08%	0	0.00%	0	0.00%	0	0.00%	2	11.11%	0	0.00%
White	28	1.62%	20	1.68%	0	0.00%	8	2.72%	0	0.00%	0	0.00%
Other	1	1.45%	1	3.23%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	2	12.50%	0	0.00%	2	66.67%	0	0.00%	0	0.00%	0	0.00%
Race N/A	1	0.27%	0	0.00%	0	0.00%	1	1.02%	0	0.00%	0	0.00%
Total	41	1.53%	28	1.60%	2	1.23%	9	1.73%	2	0.97%	0	0.00%

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





FleetBoston Financial



Overview

FleetBoston Financial
100 Federal Street
Boston, MA 02110

Description

FleetBoston Financial is the seventh-largest financial holding company in the United States, with assets exceeding \$200 billion. Fleet serves 20 million customers in more than 20 countries and territories. In 2001 Fleet operated over 1500 branches and 3700 ATMs. Fleet Bank received a rating of 'Outstanding' for all areas in a CRA report dated July 2001.

Principal Officers

Chairman and CEO

Mr. Terrance Murray
100 Federal Street
Boston, MA
617-434-2200

President

Mr. Charles Gifford
100 Federal Street
Boston, MA
617-434-2200

Chief Compliance Officer

Mr. Paul Hogan
100 Federal Street
Boston, MA
617-434-2200

Employees

Number of Employees	42,732
Number of Employees in Massachusetts	NA
Percentage of Women Employees	66%
Percentage of Minority Employees	26%

Branches

Number of Branches - Total	1500
Branches Within Boston PSMA	31
Number of ATMs	3700
Number of Free-Standing ATMs	4 in MSA

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2001
Overall Rating	OUTSTANDING
Lending Test Rating	OUTSTANDING ⁶¹
Investment Test Rating	OUTSTANDING ⁶²
Service Test Rating	OUTSTANDING ⁶³

⁶¹ Based on most recent CRA Performance Evaluation by OCC published 2001.

⁶² Ibid.

⁶³ Ibid.



Discussion

Overall rating: OUTSTANDING⁶⁴

Lending Test

Lending Test Rating: OUTSTANDING⁶⁵

General Responsiveness to Credit Needs

During the period reviewed by the OCC, Fleet Bank originated 28,353 mortgage loans totaling \$3.5 million. 13% of the total number, and 16% of the total dollar amount was in the Boston MA-NH MSA. Loans to small businesses in the MSA represent 21.81% of the number and 29.47% of the dollar amount of the bank's overall volume of loans to small businesses.

Responsiveness to Low and Moderate-Income Credit Needs

The overall distribution of Fleet's home mortgage lending was seen as excellent in the Boston MSA. However, opportunities for lending in low-income neighborhoods was reported to be limited, given the few number of owner-occupied units, (0.88% or 6,088 units) coupled with the high cost of housing.

The percentage of home-purchase loans in the Boston MSA greatly exceeded the percentage of owner-occupied housing units. This was also true for home-improvement loans, and home mortgage refinance loans.

Fleet's overall distribution of loans in the Boston MSA, by borrowers income, reflects an excellent penetration among customers of different incomes. Fleet's percentage of loans to both low and moderate-income borrowers significantly exceeded the percentage of these households.

HMDA-reportable loan applications within the Boston MSA declined from 2473 in 2000, to 2053 in 2001. For that same period, HMDA-reportable low-income applications within the Boston MSA decreased by 99, and the number of low-income loans originated decreased by 67.

⁶⁴ Based on most recent CRA Performance Evaluation by OCC published 2001.

⁶⁵ Ibid.

Leadership in Community Development Loans

During the period reviewed by the OCC, Fleet Bank originated 76 community-development loans, which totaled \$602 million.

In addition Fleet has created innovative and flexible lending products to serve the specific need of the Boston MSA. Included among these are the following:

- Neighborhood Assistance Corp of America (N.A.C.A.) – Fleet originated 249 loans under this program for \$49 million.
- Massachusetts Soft Second Program – a below market rate mortgage program with no mortgage insurance and no points (729 loans for \$47.8 million).
- Massachusetts Housing Finance Agency Home Improvement Loans.
- Fannie Mae House Boston – allow for flexible qualifying standards and low down payments.

Investment Test

Investment Test Rating: OUTSTANDING⁶⁶

The level of qualified investments is excellent. Within the Boston MSA, during this evaluation period, qualified investments totaled \$22.4 million. The volume of investments was seen as responsive to the credit needs of the community.

Service Test

Service Test Rating: OUTSTANDING⁶⁷

Description Service Delivery Systems

Fleet's delivery systems are readily accessible to geographies and individuals of different income levels in its assessment area. There are no material differences provided throughout the branch network. Fleet provides a relatively high level of community development services primarily focused on community, and small business owner education.

Branch Information

Branch locations in the Boston MSA:

⁶⁶ Ibid.

⁶⁷ Ibid.



Location	ATM	FSB			
Head Office	✓	✓	Boston, MA		
Boston, MA			University Square	✓	✓
Uphams Corner	✓	✓	Boston, MA		
Boston, MA			58 Winter Street	✓	
Fields Corner	✓	✓	Boston, MA		
Boston, MA			149 Navy Yard	✓	
Hyde Park Street	✓	✓	Boston, MA		
Boston, MA			736 Cambridge St.	✓	
Roslindale Street	✓	✓	Brighton, MA		
Boston, MA			1650 Soldiers Field Road	✓	
Brighton Avenue	✓	✓	Boston, MA		
Boston, MA			1236A Commonwealth Ave.	✓	
Berkeley Street	✓	✓	Boston, MA		
Boston, MA			186 Brighton Avenue	✓	
Park Street	✓	✓	Boston, MA		
Boston, MA			401 Washington Street	✓	
Chinatown	✓	✓	Boston, MA		
Boston, MA			957 Commonwealth Ave.	✓	
Codman Square	✓	✓	Boston, MA		
Boston, MA			1237 Commonwealth Ave.	✓	
South Boston	✓	✓	Boston, MA		
Boston, MA			660 Beacon Street	✓	
State Street	✓	✓	Boston, MA		
Boston, MA			881 Commonwealth Ave.	✓	
Brigham Circle	✓	✓	Boston, MA		
Boston, MA			771 Commonwealth Ave.	✓	
Jamaica Plain	✓	✓	Boston, MA		
Boston, MA			700 Commonwealth Ave.	✓	
West Roxbury	✓	✓	Boston, MA		
Boston, MA			82 East Concord Street	✓	
Dudley Street	✓	✓	Boston, MA		
Boston, MA			Western Ave.	✓	
Springhouse Rd	✓	✓	Boston, MA		
Boston, MA			540 Commonwealth Ave	✓	
3 Center Plaza	✓	✓	Boston, MA		
Boston, MA			354 Chestnut Hill Ave.	✓	
Canal Street	✓	✓	Boston, MA		
Boston, MA			942 Hyde Park Avenue	✓	
Boylston Street	✓	✓	Boston, MA		
Boston, MA			(Flanagan's Market)		
Mattapan	✓	✓	9-15 Poplar Street	✓	
Boston, MA			Boston, MA		
Hyde Park	✓	✓	1665 VFW Parkway	✓	
Boston, MA			Boston, MA		
South Bay Rd	✓	✓	175 Federal Street	✓	
Boston, MA			Boston, MA		
South End	✓	✓	One Post Office Square	✓	
Boston, MA			Boston, MA		
Longwood Ave	✓	✓	125 High Street	✓	
Boston, MA			Boston, MA		
Copley Square	✓	✓	285 Huntington Ave	✓	
Boston, MA			Boston, MA		
CityPlace	✓	✓	315 Washington Street	✓	
Boston, MA			Boston, MA		
Exeter Place	✓	✓	6 Tremont Street	✓	
Boston, MA			Boston, MA		
Mass. Avenue	✓	✓	65 Franklin Street	✓	
Boston, MA			Boston, MA		
Grove Hall	✓	✓	157 Stuart Street	✓	



Boston, MA		Boston, MA	
557 Boylston Street	✓	545 Freeport Street	✓
Boston, MA		Boston, MA	
699 Boylston Street	✓	616 Washington Street	✓
Boston, MA		Boston, MA	
333 Longwood Avenue	✓	283 Causeway Street	✓
Boston, MA		Boston, MA	
557-569A Tremont Street	✓	101 Huntington Avenue	✓
Boston, MA		Boston, MA	
1515 Dorchester Avenue	✓	100 Federal Street	✓
Boston, MA		Boston, MA	
125 Parker Hill Avenue	✓	114 Dudley Street	✓
Boston, MA		Boston, MA	
One Deaconess Road	✓	1219 River Street	✓
Boston, MA		Boston, MA	
171 Harrison Avenue	✓	133 Massachusetts Ave.	✓
Boston, MA		Boston, MA	
265 Franklin Street	✓	1440 Dorchester Ave	✓
Boston, MA		Boston, MA	
31 St. James Avenue	✓	161 Cambridge Street	✓
Boston, MA		Boston, MA	
300 The Fenway	✓	1857 Centre Street West	✓
Boston, MA		Roxbury, MA	
181 Cambridge Street	✓	210 Berkeley Street	✓
Boston, MA		Boston, MA	
150 South Huntington	✓	29 Corinth Street	✓
Boston, MA		Boston, MA	
550 Huntington Avenue	✓	3 Centre Plaza	✓
Boston, MA		Boston, MA	
599 Washington Street	✓	350 Chestnut Hill Ave.	✓
Boston, MA		Boston, MA	
1146 Blue Hill Avenue	✓	410 Brookline Avenue	✓
Boston, MA		Boston, MA	
1 Summer Street	✓	5 Chestnut Hill Ave.	✓
Boston, MA		Boston, MA	
1035 Truman Highway	✓	60 State Street	✓
Boston, MA		Boston, MA	
MBTA Jamaica Plain	✓	677 Centre Street Jamaica	✓
Boston, MA		Plain, MA	
950 American Legion Hwy	✓	710 Washington Street	✓
Boston, MA		Boston, MA	
51 Warren Street	✓	855 Boylston Street	✓
Boston, MA		Boston, MA	
Tremont Street	✓	2100 Dorchester Avenue	✓
Boston, MA		Boston, MA	
249 Ruggles Street	✓	621 Huntington Avenue	✓
Boston, MA		Boston, MA	
Emerson College	✓	32 Fruit Street	✓
Boston, MA		Boston, MA	
30 Rowes Wharf	✓	179 Longwood Avenue	✓
Boston, MA		Boston, MA	
255 Northern Avenue	✓	730 Atlantic Avenue	✓
Boston, MA		Boston, MA	
221 Mass. Avenue	✓	830 Washington Street	✓
Boston, MA		Boston, MA	
1230 VFW Parkway	✓	740 Gallivan Blvd.	✓
Boston, MA		Boston, MA	
360 Huntington Ave.	✓	775 Commonwealth Ave.	✓
Boston, MA		Boston, MA	
301 Centre Street	✓	1154 Centre Street	✓



Boston, MA
 400 Atlantic Avenue ✓
 Boston, MA
 First Avenue, Bldg. 34 ✓
 Boston, MA
 618 Washington Street ✓
 Boston, MA
 555 Columbia Road ✓
 Boston, MA
 Harbor Campus ✓
 Boston, MA
 636 East Broadway ✓
 Boston, MA
 260 Hanover Street ✓
 Boston, MA
 104 Canal Street ✓
 Boston, MA
 1610 Tremont Street ✓
 Boston, MA
 100 River Street ✓
 Boston, MA
 Two Fenway Plaza ✓
 Boston, MA
 569 Huntington Avenue ✓
 Boston, MA
 483 Blue Hill Avenue ✓
 Boston, MA
 745 Boylston Street ✓
 Boston, MA
 1762 Washington Street ✓
 Boston, MA
 200 Clarendon Avenue ✓
 Boston, MA
 364 Brookline Avenue ✓
 Boston, MA
 0 Post Office Square ✓
 Boston, MA
 90 Mass. Avenue ✓
 Boston, MA
 110 Huntington Avenue ✓
 Boston, MA
 243 Charles Street ✓
 Boston, MA
 1 Gillette Park ✓
 Boston, MA
 985 American Legion Hwy ✓
 Boston, MA
 1 Harborside Drive ✓
 Boston, MA
 Logan Int'l Airport Term E ✓
 Boston, MA
 Logan Int'l Airport Term C ✓
 Boston, MA
 Logan Int'l Airport Term A ✓
 Boston, MA
 60 Everett Street ✓
 Boston, MA (Stop & Shop)
 400 Western Avenue ✓
 Boston, MA
 460 West Broadway ✓

Boston, MA
 100 Morrissey Blvd ✓
 Boston, MA (bldg 1)
 100 Morrissey Blvd ✓
 Boston, MA (bldg 2)
 75 Francis Street ✓
 Boston, MA
 630 Washington Street ✓
 Boston, MA
 One Financial Center ✓
 Boston, MA (Starbucks)
 88 East Newton Street ✓
 Boston, MA
 150 Mt. Vernon Street ✓
 Boston, MA
 125 Nashua Street ✓
 Boston, MA
 290 Northern Avenue ✓
 Boston, MA (Fleet
 Pavilion)
 330 Brookline Avenue ✓
 Boston, MA
 Logan- Terminal ✓
 Boston, MA
 Fleet Center ✓
 Boston, MA
 175 Berkeley Street ✓
 Boston, MA
 529 Main Street ✓
 Charlestown, MA
 66 Thomson Place ✓
 Boston, MA
 FSB: Full Service Branch

Additional Information

In July of 2000, Fleet completed the largest divestiture in banking history. 290 branches in New England were sold to Sovereign, Citizens Bank, Cape Cod Bank and Trust and several other institutions.

March 1, 2001 Fleet and Summit Bank of New Jersey completed a merger.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	1046	2473	2053
HMDA Loans Originated	831	1677	1373
Low-Income Applications Received	242	295	196
Low-Income Loans Originated	190	191	124



Small Business Loans

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Fleet National Bank in the year 2001 is also compared to the 2001 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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank 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; July 23, 2001.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

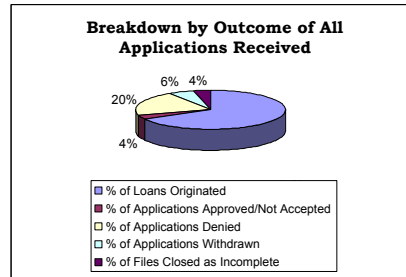
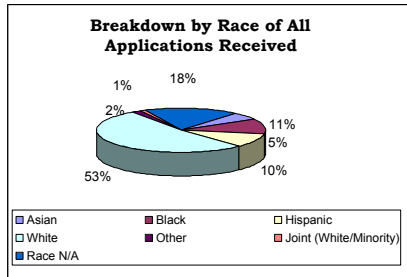
Fleet Bank website
<http://www.fleet.com/home.asp>

FleetBoston Financial Lending Information - HMDA

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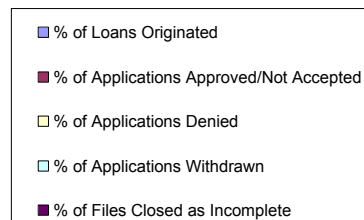
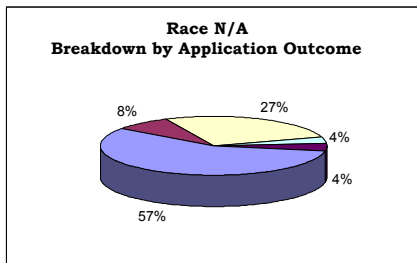
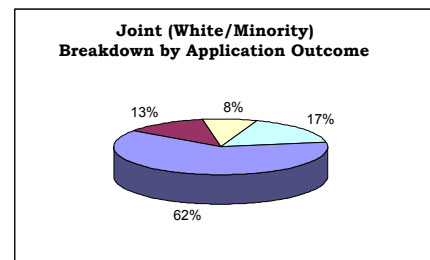
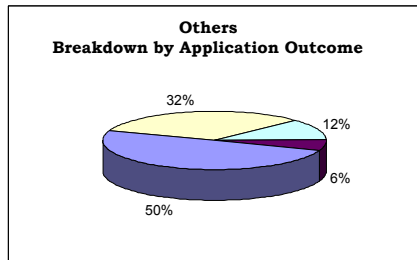
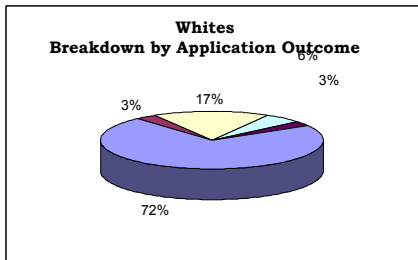
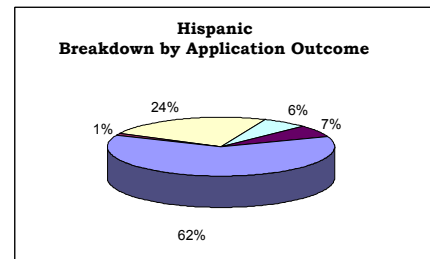
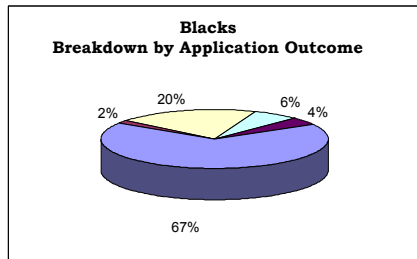
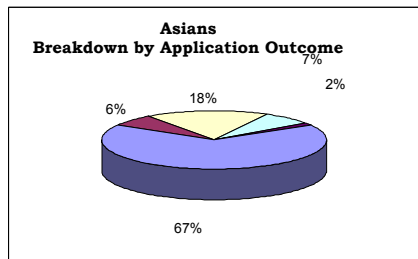
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	112	5%	75	67%	7	6%	20	18%	8	7%	2	2%
Black	233	11%	157	67%	4	2%	47	20%	15	6%	10	4%
Hispanic	208	10%	129	62%	2	1%	50	24%	13	6%	14	7%
White	1073	52%	769	72%	32	3%	182	17%	60	6%	30	3%
Other	34	2%	17	50%	0	0%	11	32%	4	12%	2	6%
Joint (White/Minority)	24	1%	15	63%	3	13%	2	8%	4	17%	0	0%
Race N/A	369	18%	211	57%	30	8%	99	27%	14	4%	15	4%
Total	2053	100%	1373	67%	78	4%	411	20%	118	6%	73	4%

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.

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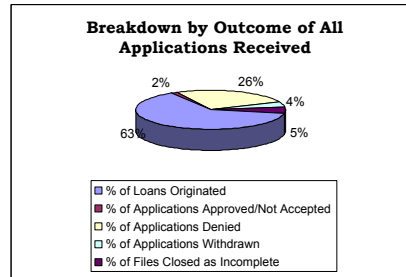
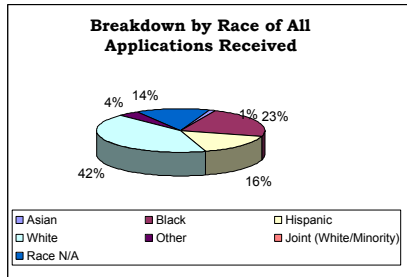


FleetBoston Financial Low-Income Mortgage Information

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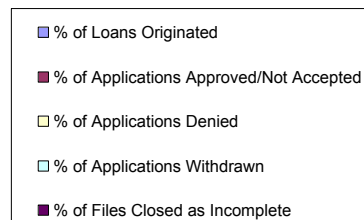
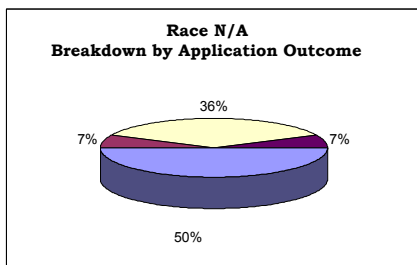
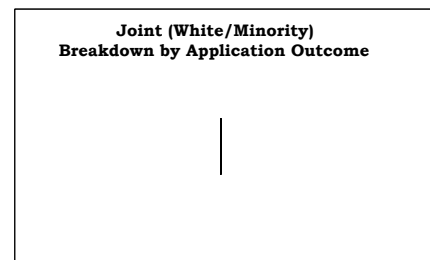
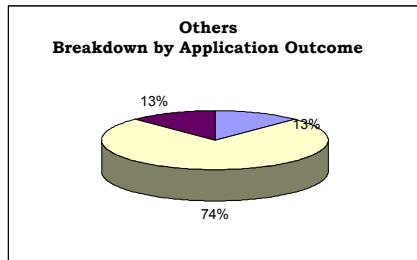
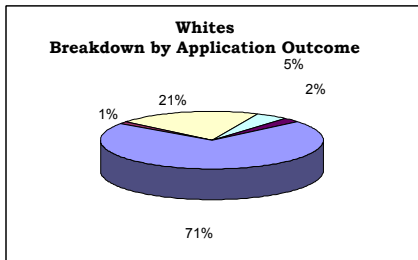
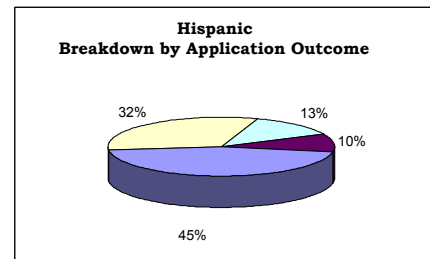
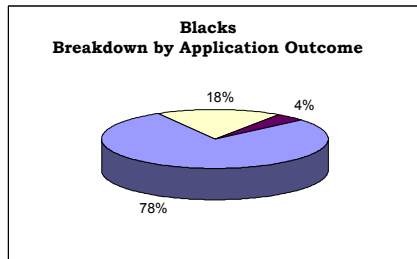
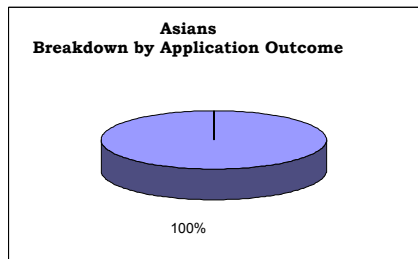
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Asian	2	1%	2	100%	0	0%	0	0%	0	0%	0	0%
Black	45	23%	35	78%	0	0%	8	18%	0	0%	2	4%
Hispanic	31	16%	14	45%	0	0%	10	32%	4	13%	3	10%
White	82	42%	58	71%	1	1%	17	21%	4	5%	2	2%
Other	8	4%	1	13%	0	0%	6	75%	0	0%	1	13%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	28	14%	14	50%	2	7%	10	36%	0	0%	2	7%
Total	196	100%	124	63%	3	2%	51	26%	8	4%	10	5%

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.



Compared against the MSA Aggregate Total

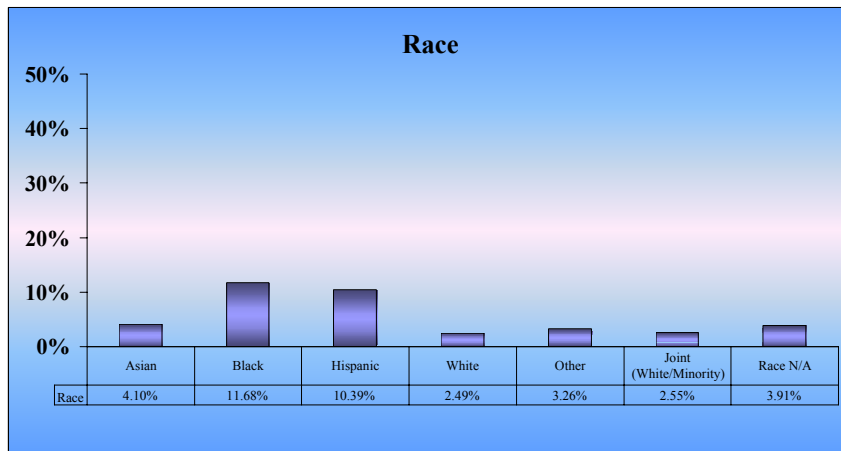
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FleetBoston Financial HMDA Mortgage Information

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
Asian	112	4.10%	75	3.55%	7	3.26%	20	9.35%	8	5.00%	2	7.41%
Black	233	11.68%	157	12.38%	4	2.55%	47	12.60%	15	10.42%	10	18.87%
Hispanic	208	10.39%	129	9.35%	2	1.53%	50	15.97%	13	9.56%	14	33.33%
White	1073	2.49%	769	2.24%	32	0.97%	182	6.43%	60	2.88%	30	6.22%
Other	34	3.26%	17	2.28%	0	0.00%	11	8.46%	4	5.06%	2	11.11%
Joint (White/Minority)	24	2.55%	15	2.01%	3	4.23%	2	3.45%	4	8.00%	0	0.00%
Race N/A	369	3.91%	211	3.26%	30	3.25%	99	10.63%	14	1.45%	15	10.00%
Total	2053	3.35%	1373	2.92%	78	1.60%	411	8.47%	118	3.26%	73	9.25%

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.

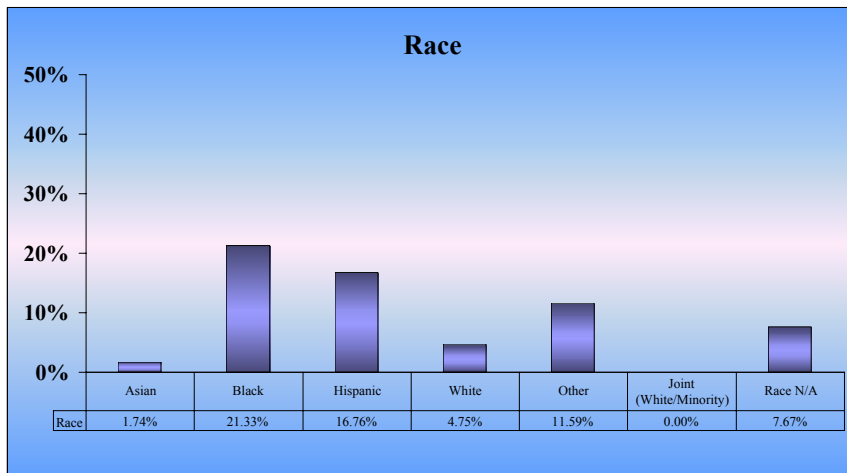
An adjustment to the scale in this chart was required to accurately depict Fleet's percentage of loans compared against the MSA total.



FleetBoston Financial Low-Income Mortgage Information

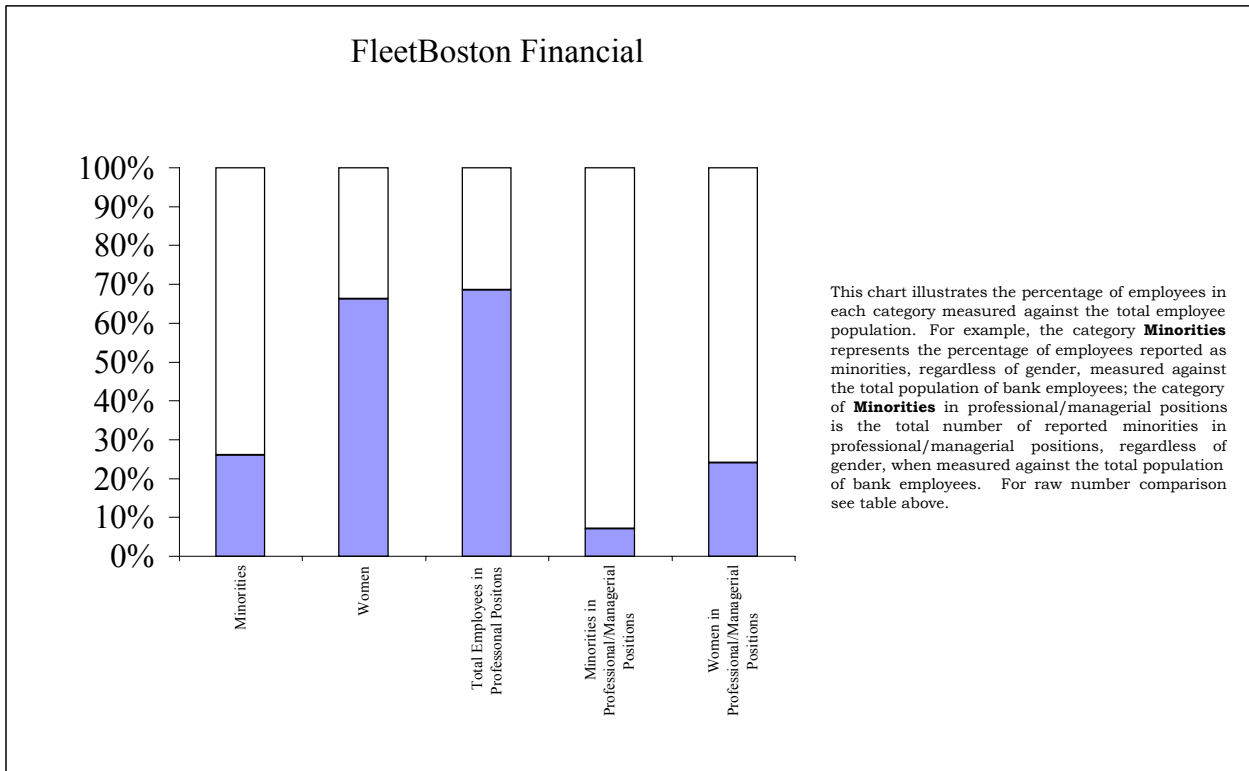
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	2	1.74%	2	2.35%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	45	21.33%	35	23.97%	0	0.00%	8	20.00%	0	0.00%	2	28.57%
Hispanic	31	16.76%	14	12.61%	0	0.00%	10	21.74%	4	22.22%	3	60.00%
White	82	4.75%	58	4.89%	1	0.95%	17	5.78%	4	3.42%	2	9.09%
Other	8	11.59%	1	3.23%	0	0.00%	6	27.27%	0	0.00%	1	33.33%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	28	7.67%	14	7.73%	2	6.67%	10	10.20%	0	0.00%	2	22.22%
Total	196	7.30%	124	7.09%	3	1.84%	51	9.83%	8	3.86%	10	20.83%

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.



FleetBoston Financial Employment Numbers

	Number of Employees	Percent of Total Employees
Total	42,732	
Minorities	11,142	26%
Women	28,307	66%
Total Employees In Professional Positions	29,251	68%
Minorities in Professional or Managerial Positions	3,016	7%
Women in Professional or Managerial Positions	10,249	24%





Hyde Park Cooperative Bank

**Overview**

Hyde Park Cooperative Bank
1172 River Street
Hyde Park, MA

Description

Hyde Park Cooperative Bank is a state-chartered thrift with principal offices in Boston, Massachusetts and assets in excess of \$82 million. Hyde Park Cooperative Bank participates in first time homebuyer programs and a "soft-second" program. Its primary focus is residential mortgage lending. In 2001, Hyde Park Cooperative operated 2 branches in Boston.

Principal Officers**CEO**

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

CFO

Robert Nelson
1172 River Street
Hyde Park, MA
617-364-6000

Chief Compliance Officer

Robert Nelson
1172 River Street
Hyde Park, MA
617-364-6000

Employees

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

Branches

Number of Branches - Total	2
Branches Within Boston PSMA	2
Number of ATMs	4
Number of Free-Standing ATMs	2

CRA Rating

Rating Agency	Office of Thrift Supervision
Most Recent Rating	1999
Overall Rating	SATISFACTORY⁶⁸
Lending Test Rating	NOT RATED
Investment Test Rating	NOT RATED
Service Test Rating	NOT RATED

⁶⁸ Based on most recent CRA Performance Evaluation by OTS published 1999.

**Discussion****Overall rating: SATISFACTORY⁶⁹**

According to the OTS 1999 report, Hyde Park Cooperative Bank's satisfactory performance rating was due to the fact that the majority of residential loans originated by Hyde Park Cooperative Bank were within their assessment area.

Lending Test**Lending Test Rating: NOT RATED****General Responsiveness to Credit Needs**

In 2001, Hyde Park Cooperative made one HMDA reportable low-income mortgage loan. During that same period, Hyde Park Cooperative received 17 HMDA-reportable loan applications and originated 11 loans.

Responsiveness to Low and Moderate-Income Credit Needs

Hyde Park Cooperative Bank offers the following lending programs to help meet the needs of the community:

- First Time Buyer Program
- Soft Second Program
- Boston Home Certificate
- Construction Loans
- Conforming Fixed Rate Mortgages
- Conforming ARM Mortgages
- Equity Loans and Lines of Credit
- Consumer Loans, including: Home Improvement, Auto and Personal Loans.

Leadership in Community Development Loans**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
1172 River Street Hyde Park, MA 02136	✓	✓
185 Wolcott Square Hyde Park, MA 02136	✓	
427 Sprague Street Dedham, MA 02026	✓	
733 Centre Street Jamaica Plain, MA 02130	✓	✓

FSB: Full Service Branch

Additional Information

- Corporate Donations.
- Hyde Park YMCA.
- The Italian Home for Children.
- Hyde Park Main Streets.
- The Anderson Tree Lighting.
- Massachusetts Bankers Association Charitable Foundation.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	27	22	17
HMDA Loans Originated	25	20	11
Low-Income Applications Received	1	1	1
Low-Income Loans Originated	1	1	1

HDMA-reportable applications decreased by 5 in 2000, as did the number of loans originated. In 2001, HMDA-reportable loan applications decreased by 4 and originations decreased by 9.

Small Business Loans

No 2001 HMDA reportable small business loan data was available for Hyde Park Cooperative Bank.⁷⁰

⁶⁹ Based on most recent CRA Performance Evaluation by OTS published 1999.

⁷⁰ FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.



Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank 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 Thrift Supervision; June 7,
1999.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

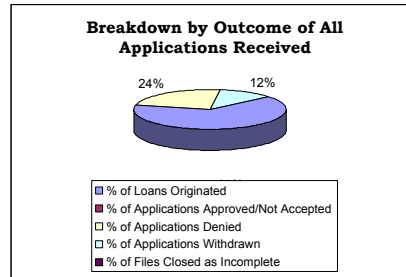
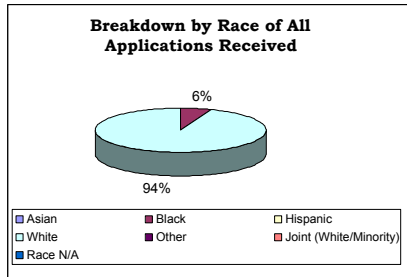
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Hyde Park Cooperative Bank Lending Information - HMDA

2001

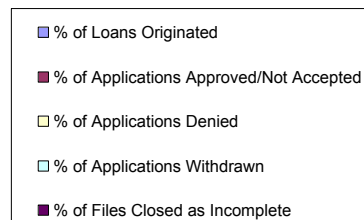
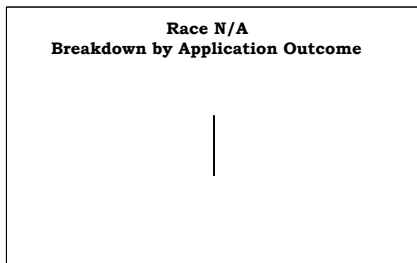
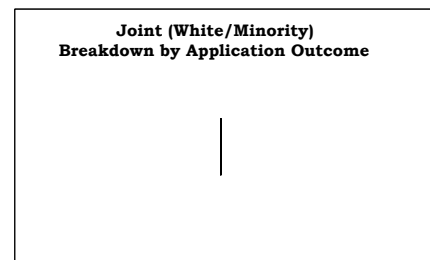
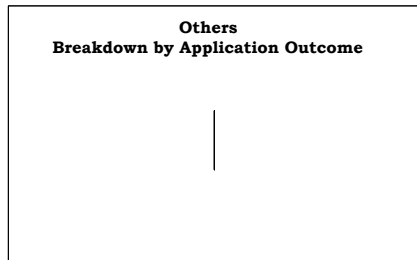
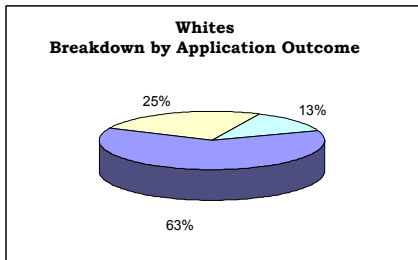
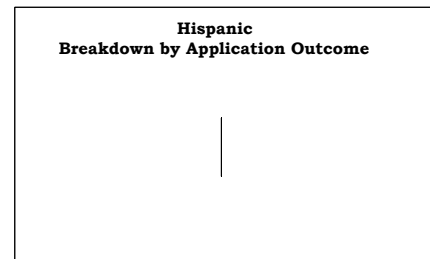
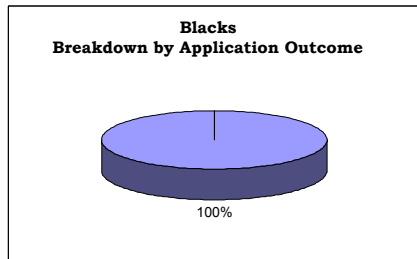
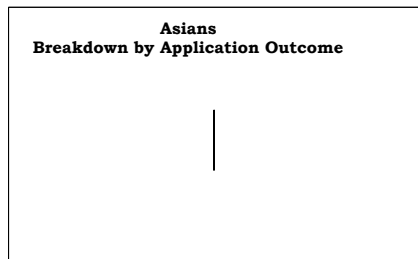
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Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	1	6%	1	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	16	94%	10	63%	0	0%	4	25%	2	13%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	17	100%	11	65%	0	0%	4	24%	2	12%	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 the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

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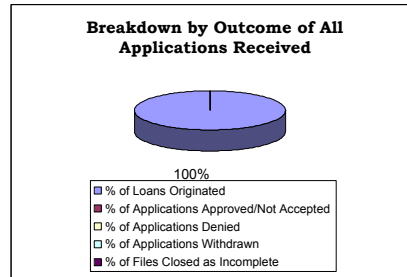
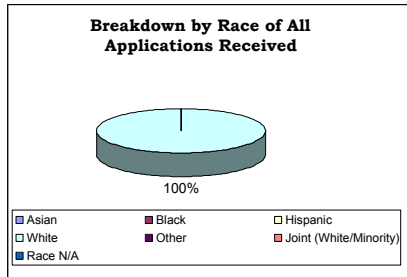


Hyde Park Cooperative Bank Low-Income Mortgage Information

2001

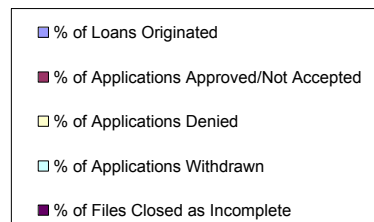
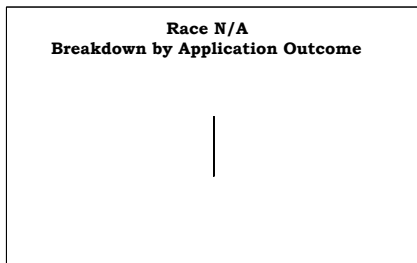
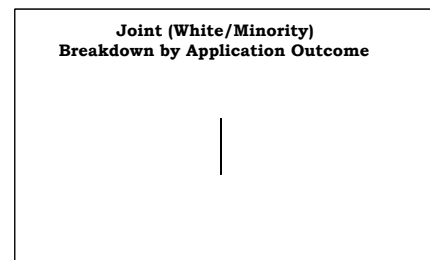
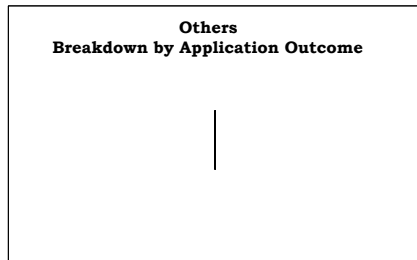
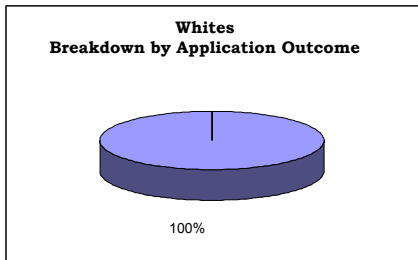
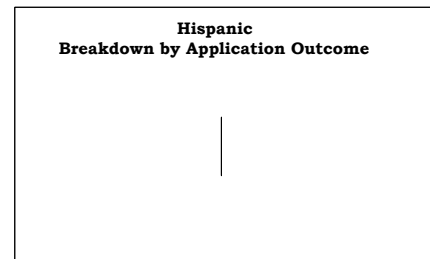
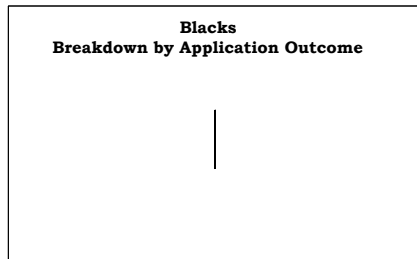
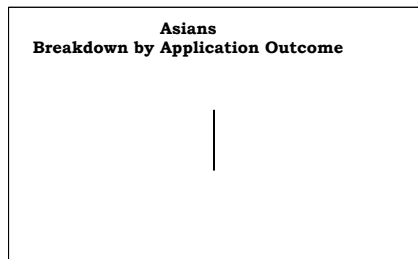
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Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%

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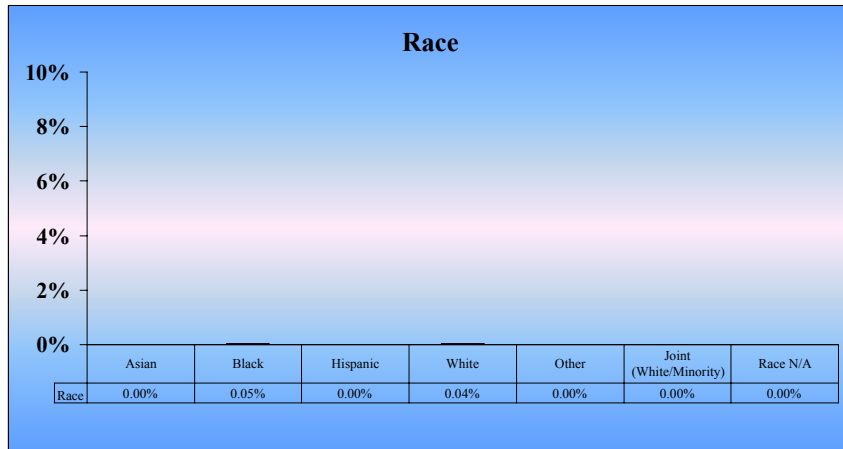
Compared against the MSA Aggregate Total

2001

Hyde Park Cooperative 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
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	1	0.05%	1	0.08%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	16	0.04%	10	0.03%	0	0.00%	4	0.14%	2	0.10%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	17	0.03%	11	0.02%	0	0.00%	4	0.08%	2	0.06%	0	0.00%

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.



Hyde Park Cooperative 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
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	1	0.06%	1	0.08%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	1	0.04%	1	0.06%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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





Hyde Park Savings Bank

**Overview**

Hyde Park Savings Bank
1196 River Street
Hyde Park, MA 02136

Description

Hyde Park Savings Bank is a state-chartered, mutual savings institution headquartered in the Hyde Park neighborhood of Boston. With total assets of \$486 million, Hyde Park Savings Bank is primarily a mortgage lender with 98.1% of its portfolio secured by real estate.

Principal Officers**CEO**

Kenneth Pierog
1196 River Street
Hyde Park, MA
617-361-6900

CFO

Steve McNulty
1196 River Street
Hyde Park, MA
617-361-6900

Chief Compliance Officer

Paul Bunker
1196 River Street
Hyde Park, MA
617-361-6900

Employees

Number of Employees	98
Number of Employees in Massachusetts	98
Percentage of Women Employees	72%
Percentage of Minority Employees	33%

Branches

Number of Branches - Total	4
Branches Within Boston PSMA	2
Number of ATMs	4
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2001
Overall Rating	SATISFACTORY ⁷¹
Lending Test Rating	LOW SATISFACTORY
Investment Test Rating	HIGH SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

⁷¹Based on most recent CRA Performance Evaluation by FDIC published 2001.



Discussion

Overall rating: SATISFACTORY⁷²

Lending Test

Lending Test Rating: LOW SATISFACTORY

General Responsiveness to Credit Needs

Hyde Park Savings Bank (HPSB) is primarily a home mortgage lender with 94.1% of its loan portfolio secured by mortgages to residential properties for one to four families. The November 9, 2001 report generated by the FDIC focused primarily on the bank's home mortgage lending record.

The bank originated 305 HMDA-reportable loans, totaling \$62.5 million, since January 1, 1999. Approximately 60.8% of the loans, by number, originated for the purchase of one to four-family residences. The HMDA data shows no home improvement loans, as the bank does not have a loan specifically for home improvement.

Responsiveness to Low and Moderate-Income Credit Needs

The number and dollar volume of HMDA lending has shown a downward trend since 1998. In 1998, the bank originated 343 HMDA-reportable loans totaling \$42.0 million. For 1999, the number of HMDA-reportable loans dropped by 29.1%, to 243 loans, totaling \$36.9 million. In 2000, the trend continued with a 46.9% decline in the number of HMDA loans originated. Several factors may have contributed to this decline. The rising interest rate environment in 1999 and 2000 reduced the demand for refinance loans. The escalating cost of homes in the area created a shortage of affordable homes. For example, the median selling prices in the assessment area increased an average of 30 % from 1998 to 2000. The bank is facing increasing competition from larger regional banks and mortgage companies.

The bank has originated an adequate percentage of loans within the assessment area. The greatest percentage of loans in the assessment area is

made in middle-income census tracts. Strong performance in the middle-income census tracts is attributed primarily to the high percentage of owner-occupied housing in these tracts.

The moderate-income census tracts account for the next largest share of loans originated. The moderate-income census tracts are located in the Hyde Park, Mattapan, Roslindale, and West Roxbury neighborhoods. The bank has done very well originating loans with the census tracts in Hyde Park and Roslindale.

Lending in Mattapan's moderate-income census tracts has been modest.

There were no loans in the low-income tract. However, that census tract has just 19 housing units and limited lending opportunities.

Leadership in Community Development Loans

The bank has originated or facilitated a relatively high level of community development loans.

The bank has participated with the Massachusetts Housing Investment Corporation to establish a loan pool of \$250,000 to finance new construction, rehabilitation and acquisition for low and moderate-income families. This loan pool represents loan guarantees for bridge loans.

Investment Test

Investment Test Rating: HIGH SATISFACTORY

Hyde Park Savings Bank's qualified investments include: funding for section 8 housing units, business developments loans, CRA related debt instruments, and revenue to fund mortgages and small business loans in low-income areas of Boston.

- Two GNMA pass-through pools were established to benefit the Florence Apartments in Roslindale, 93% of which are section 8 housing units. It also benefited the Cummins Towers in Roslindale, which has 76% section 8 housing units.
- A loan pool was established for the Boston Business Development Corporation. This organization uses these funds to originate loans to small manufacturing companies in

⁷² Based on most recent CRA Performance Evaluation by FDIC published 2001.



Hyde Park Saving's CRA area, and throughout Massachusetts.

- There was an Investment of five shares in the Access Capital Strategies Community Investment Funds. These funds are backed by securities. The funds are used to provide financing for small businesses and for residential mortgages in the low and moderate-income, urban neighborhoods of Boston.
- The Community Reinvestment Act Qualified Investment Fund is an institutional mutual fund that invests in CRA related debt instruments, such as FNMA, FHLMC, GNMA and AAA-rated bondholders.

Service Test

Service Test Rating: HIGH SATISFACTORY

Description Service Delivery Systems

HPSB operates a main office and three full-service branch offices. The main office in Hyde Park is located in a moderate-income census tract, the Readville (Hyde Park) and Norwood offices are located in middle-income census tracts, and the Dedham branch office is located in an upper-income census tract. All offices, with the exception of the Dedham office, have drive-up windows.

The bank operates Automated Teller Machines (ATMs) at each of its offices. HPSB offers a "Bank by Mail" service that is available to customers who are unable to get to a branch.

The bank recently added a 24-hour Bank-by-Phone service.

The bank has not opened or closed any branch offices since the last FDIC examination.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1172 River Street Hyde Park, MA*	✓	✓
185 Wolcott Square Hyde Park, MA*	✓	✓
427 Sprague Street Dedham, MA	✓	✓
733 Centre Street Jamaica Plain, MA	✓	✓

FSB: Full Service Branch

*Branches and ATMs located in low and moderate-income geographies.

Special Programs

The HPSB provides a relatively high level of community development services. They collaborate with the Ecumenical Social Action Committee (ESAC) of Jamaica Plain in its Sustainable Homeownership Program. The goal of this program is to prevent needless home foreclosures. HPSB has financed five homeowners out of foreclosure since August 1999.

They are also a participant in the Massachusetts Banker's Association Foreclosure Prevention Project. This project is a cooperative program providing financial counseling to low and moderate-income homeowners across Massachusetts.

HPSB is an approved participant in the Boston Certificate Initiative Program, sponsored by the City of Boston's Department of Neighborhood Development, and the Boston Local Development Corporation. This program awards funds to qualified homebuyers in Boston for down payment and closing cost assistance.

The bank has a designated "Credit Helper" at each of its office locations. The "Credit Helper" provides counseling for customers and answers loan related questions.

They also participate in the "Second Opinion" mortgage review. This service is free-of-charge and was implemented to help protect customers and non-customers from dubious mortgage origination practices.



The bank offers low-cost checking and savings products to all customers.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	134	94	63
HMDA Loans Originated	117	87	48
Low-Income Applications Received	8	4	4
Low-Income Loans Originated	6	4	4

The number and dollar volume of HMDA lending has shown a downward trend since 1998. In 1998, the bank originated 343 HMDA-reportable loans, totaling \$42.0 million. For 1999, the number of HMDA-reportable loans dropped by 29.1%, to 243 loans, totaling \$36.9 million. In 2000, the trend continued with a 46.9% decline in the number of HMDA loans originated. Several factors may have contributed to this decline. The rising interest rate environment in 1999 and 2000 reduced the demand for refinance loans. The escalating cost of homes in the area created a shortage of affordable homes. For example, the median selling prices in the assessment area increased an average of 30 % from 1998 to 2000. The bank is facing increasing competition from larger regional banks and mortgage companies. The trend continued into 2001 with a further decrease in the HMDA-reportable applications and originations decreasing further, by 33% and 45% respectively. Loans to low-income borrowers stayed constant at 4 applications and an equal number of originations.

Small Business Loans

No 2001 HMDA reportable small business loan data was available for Hyde Park Savings Bank.⁷³

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

⁷³ FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; May 9, 2001.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

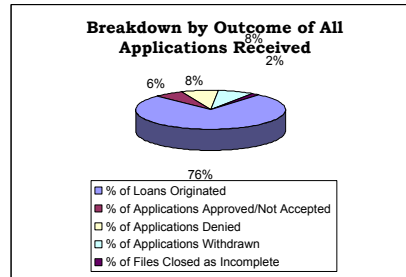
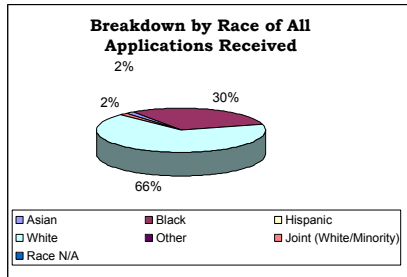
Hyde Park Savings Bank website
<http://www.hydeparkbank.com/>

Hyde Park Savings Bank Lending Information - HMDA

2001

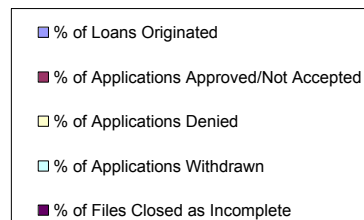
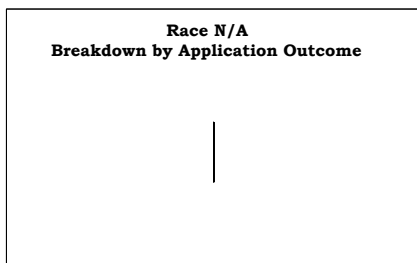
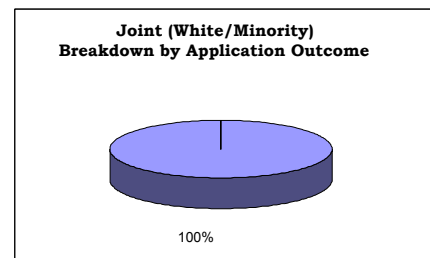
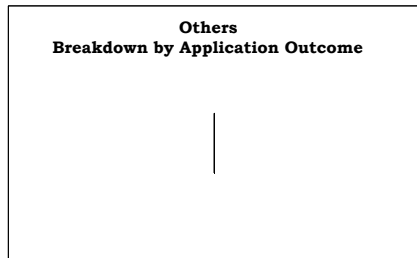
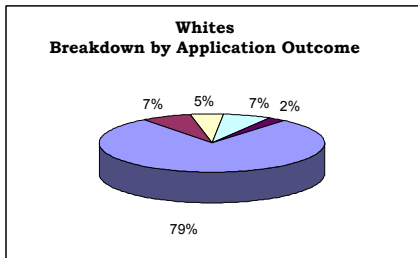
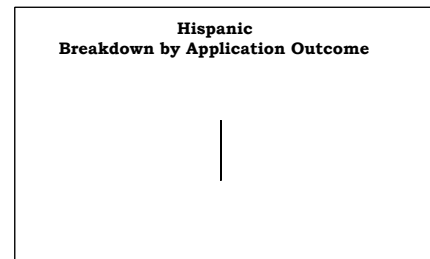
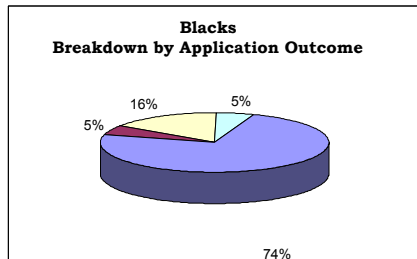
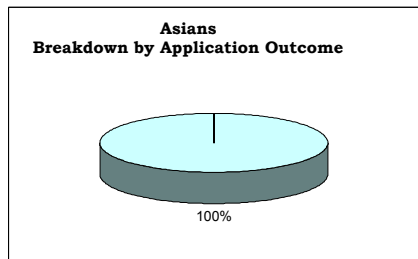
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	1	2%	0	0%	0	0%	0	0%	1	100%	0	0%
Black	19	30%	14	74%	1	5%	3	16%	1	5%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	42	67%	33	79%	3	7%	2	5%	3	7%	1	2%
Other	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	2%	1	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	63	100%	48	76%	4	6%	5	8%	5	8%	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 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.

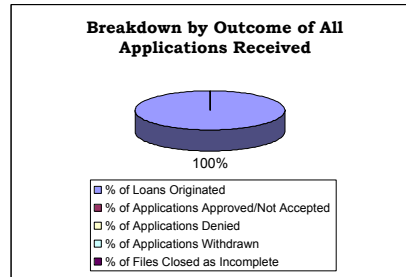
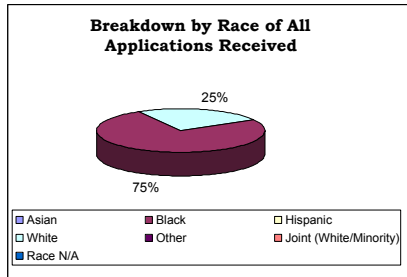


Hyde Park Savings Bank Low-Income Mortgage Information

2001

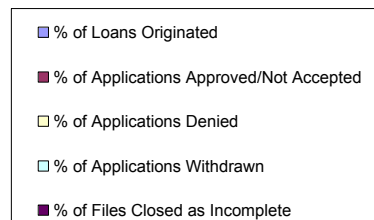
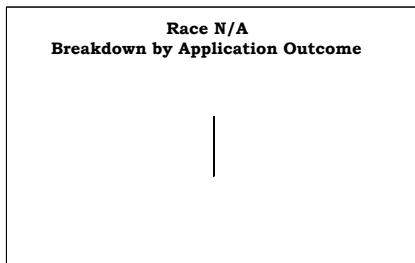
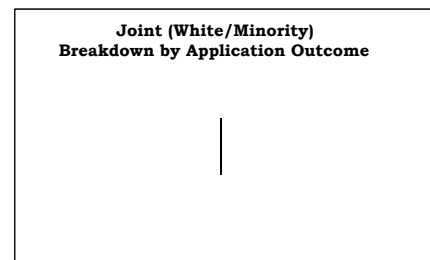
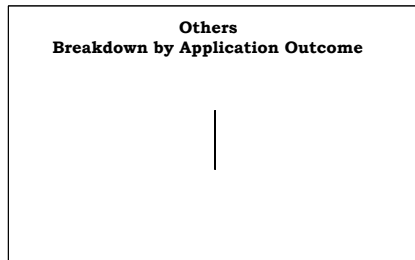
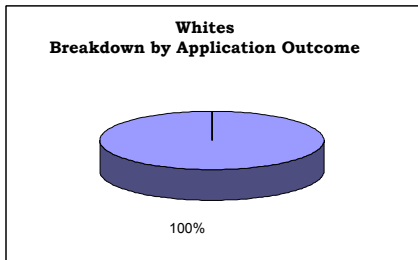
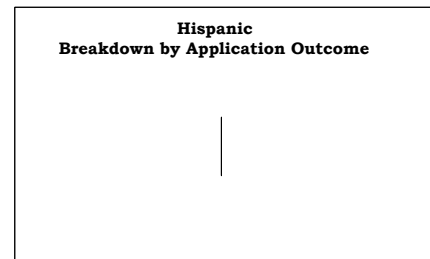
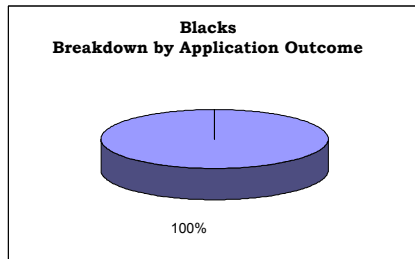
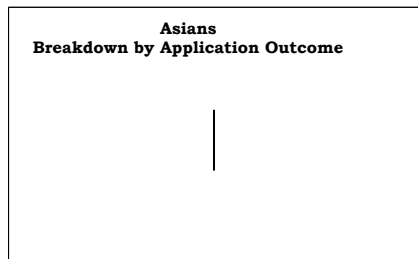
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	3	75%	3	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	25%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	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	4	100%	4	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 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.



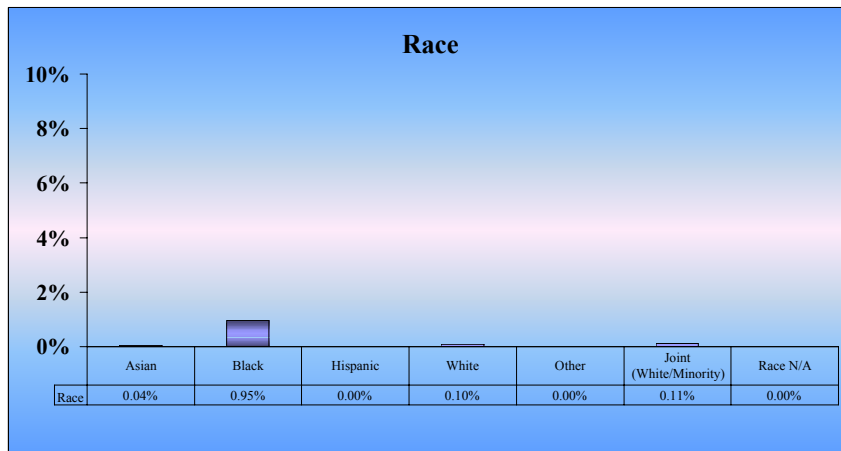
Compared against the MSA Aggregate Total

2001

Hyde Park 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
Asian	1	0.04%	0	0.00%	0	0.00%	0	0.00%	1	0.63%	0	0.00%
Black	19	0.95%	14	1.10%	1	0.64%	3	0.80%	1	0.69%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	42	0.10%	33	0.10%	3	0.09%	2	0.07%	3	0.14%	1	0.21%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	1	0.11%	1	0.13%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	63	0.10%	48	0.10%	4	0.08%	5	0.10%	5	0.14%	1	0.13%

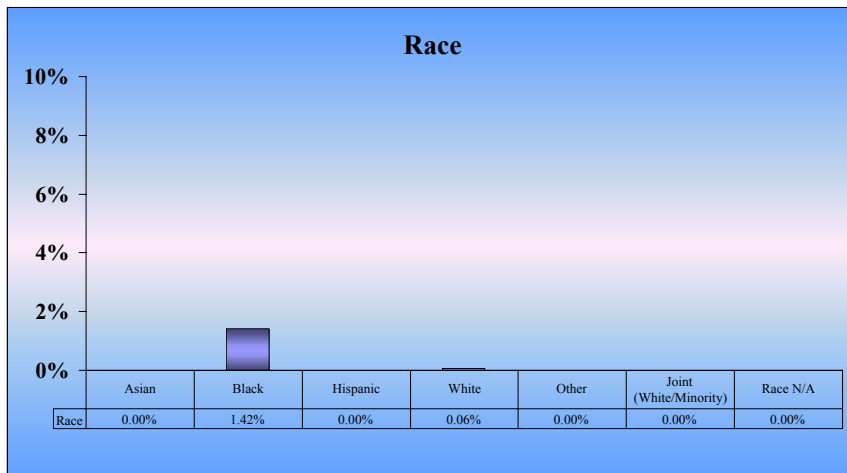
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hyde Park 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
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	3	1.42%	3	2.05%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	1	0.06%	1	0.08%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	4	0.15%	4	0.23%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

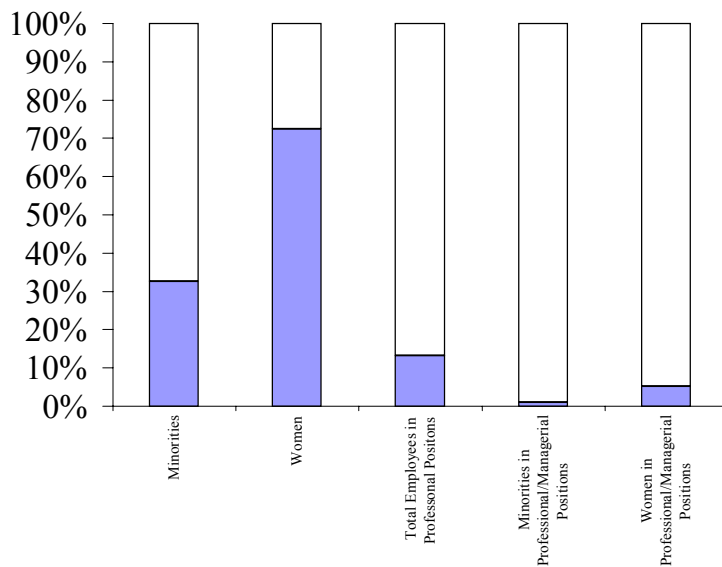
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Hyde Park Savings Bank Employment Numbers

	Number of Employees	Percent of Total Employees
Total	98	
Minorities	32	33%
Women	71	72%
Total Employees In Professional Positions	13	13%
Minorities in Professional or Managerial Positions	1	1%
Women in Professional or Managerial Positions	5	5%

Hyde Park Savings Bank



This chart illustrates the percentage of employees in each category measured against the total employee population. For example, the category **Minorities** represents the percentage of employees reported as minorities, regardless of gender, measured against the total population of bank employees; the category of **Minorities** in professional/managerial positions is the total number of reported minorities in professional/managerial positions, regardless of gender, when measured against the total population of bank employees. For raw number comparison see table above.



Liberty Bank & Trust



Overview

Liberty Bank & Trust⁷⁴
21 Milk Street
Boston, MA 02109

Description

In 2001, Liberty Bank & Trust Company was a \$37.4 million organization. Liberty Bank & Trust Company* was founded in 1965, and operated 2 branches in the Boston area, with focus on the Asian-American market.

Liberty Bank & Trust Company was purchased by General Bank of Los Angeles California in October of 2001. The CRA report used for Liberty & Trust Company is dated April 26, 1999 and was the most current at the time of the acquisition.

The following quote of Li-Pei Wu, chairman of GBC Bancorp and General Bank describes the strategy for the acquisition: "The acquisition of Liberty Bank and Trust represents a further step in our strategy of expanding our banking activities to the major Asian-American markets in the country. Liberty Bank has built a strong reputation of banking expertise in this market. Our entry into the Massachusetts market, through Liberty Bank will permit us to further extend our core activities of international trade finance, construction and technology lending." ⁷⁵

Principal Officers

CEO⁷⁶

Lei Pei Wu
800 West Street
Los Angeles, California
213-896-0098

President/Regional President

Linda Moulton
21 Milk Street
Boston, MA
617-338-4700

CFO

Peter Lowe
800 West Street
Los Angeles, California
213-896-0098

Chief Compliance Officer

Shirley Wong
4128 Temple City Blvd.
Rosemead, CA
626-582-7269

Employees

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

Branches

Number of Branches - Total	2
Branches Within Boston PSMA	2
Number of ATMs	NA
Number of Free-Standing ATMs	NA

CRA Rating

Rating Agency	FDIC
Most Recent Rating	1999

Overall Rating	SATISFACTORY ⁷⁷
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Lending Test Rating	NOT RATED
Investment Test Rating	NOT RATED
Service Test Rating	NOT RATED

⁷⁴ On March 1, 2002 General Bank of California acquired Liberty Bank.

⁷⁵ www.generalbank.com

⁷⁶ Effective 3/1/2002

⁷⁷ Based on most recent CRA Performance Evaluation by FDIC published 1999.



Discussion

Overall rating: SATISFACTORY⁷⁸

General Bank, which purchased Liberty Bank received a CRA evaluation in December of 2001. The evaluation did not include any Boston information because the evaluation preceded the acquisition. Ratings are included below as a reference only.

General Bank CRA Rating

Rating Agency	FDIC
Most Recent Rating	2001
Overall Rating	SATISFACTORY⁷⁹
Lending Test Rating	High Satisfactory
Investment Test Rating	High Satisfactory
Service Test Rating	High Satisfactory

Lending Test

Lending Test Rating: NOT RATED.

General Responsiveness to Credit Needs

Liberty Bank & Trust is primarily a commercial bank that lends funds to small and medium-sized businesses. The applications and originations of mortgages are minimal. In 2001 Liberty Bank received 3 applications for HMDA-reportable loans and originated one.

Responsiveness to Low and Moderate-Income Credit Needs

Liberty Bank & Trust generated one mortgage to a low or moderate-income individual in the year 2000. The mortgage amount was \$125,000.

Two loans were originated in 2001 for low-income borrowers and one was originated. They generated 62 small business loans, totaling \$5,375,000.

Leadership in Community Development Loans

According to the 1999 FDIC report, Liberty Bank & Trust purchased a six-month Community Development Certificate of Deposit from Boston Bank of Commerce.

The proceeds from the investment are automatically invested in one of the 4 Community Development Programs. All 4 programs benefit low and moderate-income areas and individuals.

Investment Test

Investment Test Rating: NOT RATED.

Service Test

Service Test Rating: NOT RATED.

Liberty Bank & Trust participated in 3 seminars sponsored by the Chinese Cultural Center. The bank offered free passbook savings accounts to all students participating in the Chung Yee School after-school program. The school is located in low-income geography and provides it services primarily to low and moderate-income students.

Description Service Delivery Systems

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
21 Milk Street Boston, MA 02109		✓
681 Washington Street Boston, MA 02111		✓

FSB: Full Service Branch

Special Programs

The State Office of Minority Business Assistance (SOMWBA) has certified Liberty Bank & Trust as a minority business enterprise.

⁷⁸ Based on most recent CRA Performance Evaluation by FDIC published 1999.

⁷⁹ Ibid.



Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	5	3	3
HMDA Loans Originated	3	2	1
Low-Income Applications Received	0	0	2
Low-Income Loans Originated	0	0	1

Small Business Loans

No 2001 HMDA reportable small business loan data was available for Liberty Bank.⁸⁰

Loan Information By Census Tract

Please refer to the addendum The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

⁸⁰ FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.



Source Documents

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; April 26, 1999. (Liberty Bank)

Community Reinvestment Act Performance
Evaluation, Federal Deposit Insurance
Corporation; December 10, 2001. (General
Bank)

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

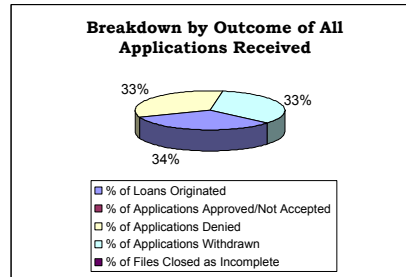
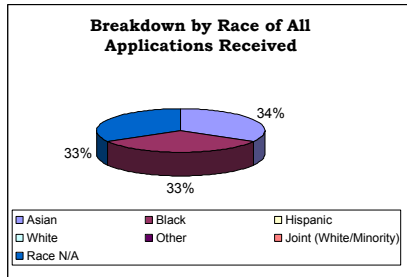
General Bank website
<http://www.generalbank.com/>

Liberty Bank Lending Information - HMDA

2001

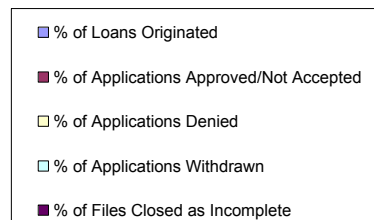
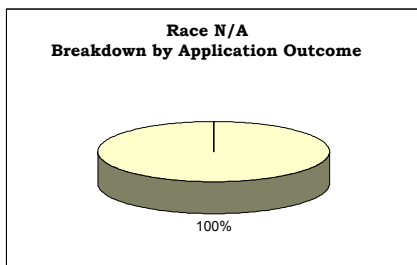
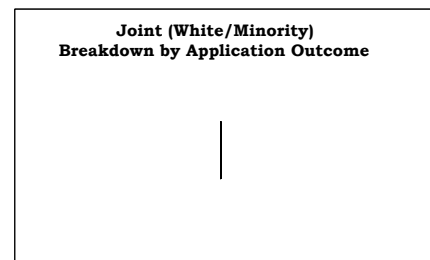
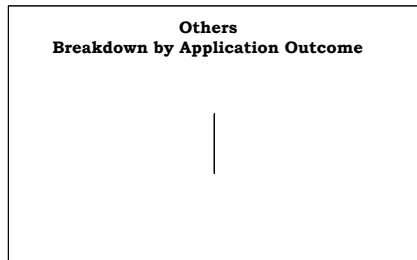
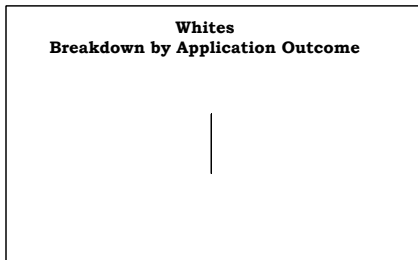
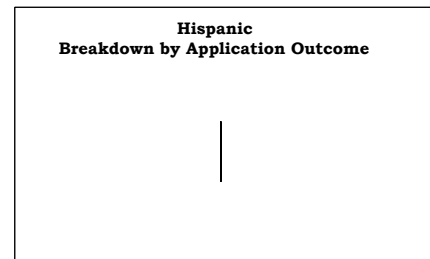
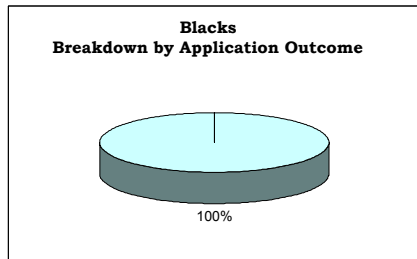
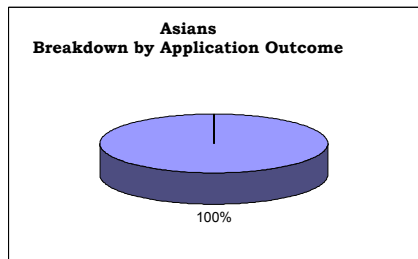
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	1	33%	1	100%	0	0%	0	0%	0	0%	0	0%
Black	1	33%	0	0%	0	0%	0	0%	1	100%	0	0%
Hispanic	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%
Other	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%	1	100%	0	0%	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 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.

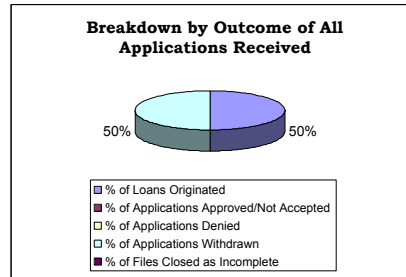
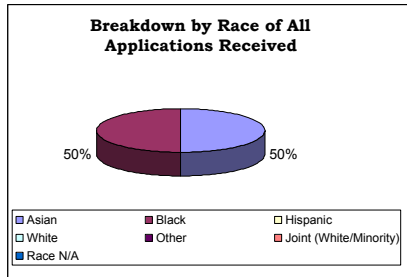


Liberty Bank & Trust Low-Income Mortgage Information

2001

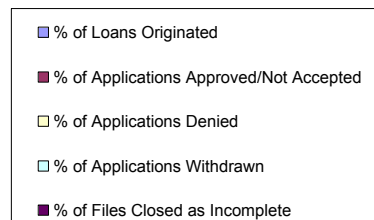
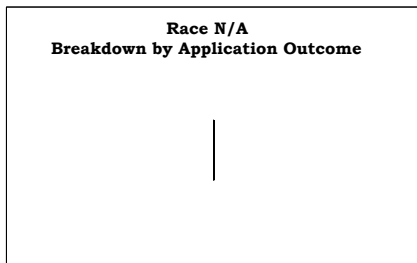
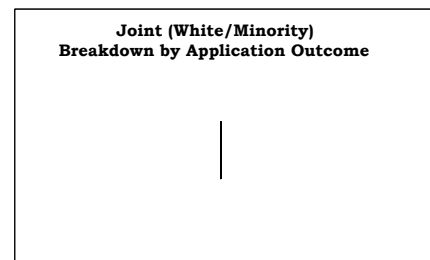
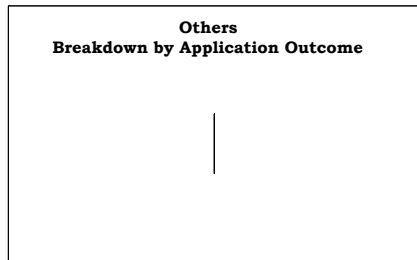
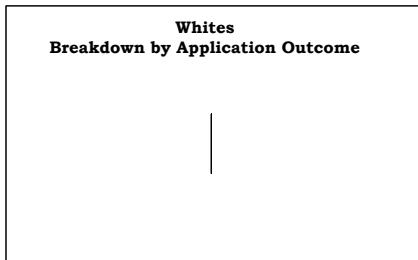
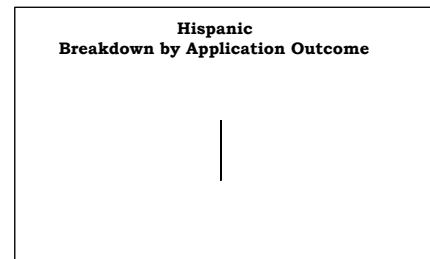
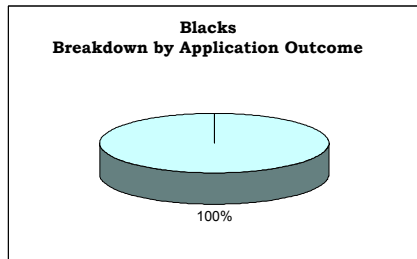
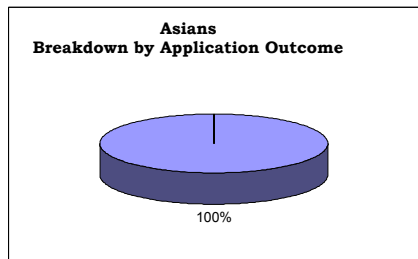
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	1	50%	1	100%	0	0%	0	0%	0	0%	0	0%
Black	1	50%	0	0%	0	0%	0	0%	1	100%	0	0%
Hispanic	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%
Other	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 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.



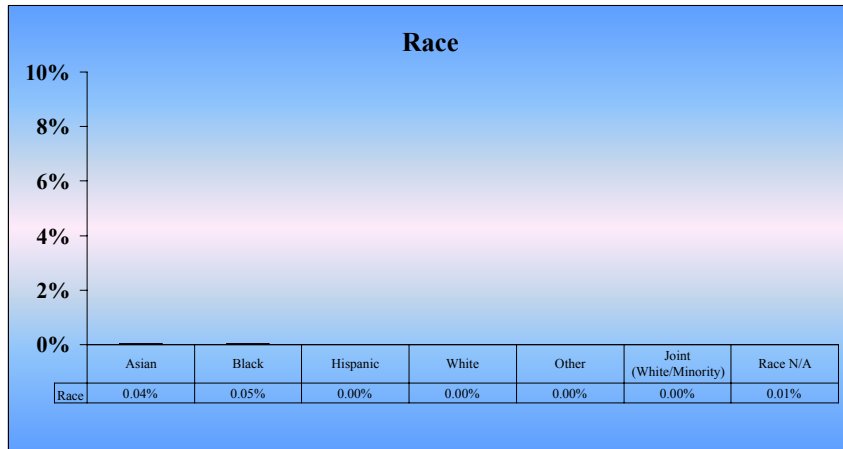
Compared against the MSA Aggregate Total

2001

Liberty 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
Asian	1	0.04%	1	0.05%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	1	0.05%	0	0.00%	0	0.00%	0	0.00%	1	0.69%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	1	0.01%	0	0.00%	0	0.00%	1	0.11%	0	0.00%	0	0.00%
Total	3	0.00%	1	0.00%	0	0.00%	1	0.02%	1	0.03%	0	0.00%

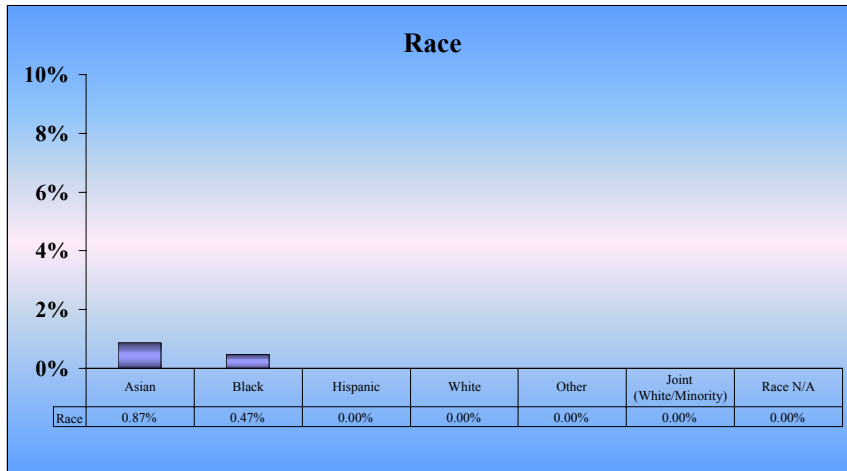
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Liberty 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
Asian	1	0.87%	1	1.18%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	1	0.47%	0	0.00%	0	0.00%	0	0.00%	1	10.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	2	0.07%	1	0.06%	0	0.00%	0	0.00%	1	0.48%	0	0.00%

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





Mellon Bank



Overview

Mellon Bank
One Mellon Place
Pittsburgh, PA 15258

New England Regional Headquarters:
135 Santilli Highway
Everett, MA

Description

Mellon Bank, N.A. is a wholly owned subsidiary of Mellon Bank Corporation, a bank holding company with \$50 billion in assets. Mellon Bank is headquartered in Pittsburgh, Pa and serves Pennsylvania and parts of New Jersey. Mellon's two core businesses include investment and banking services. Mellon offers its own affordable mortgage product. Mellon is also a large corporate and institutional bank with clients across the country and throughout the world.

In September 1999, MFC sold its in-house mortgage affiliate, Mellon Mortgage Company. This sale eliminated the Bank's structural and functional capability to originate, process and underwrite home purchase and first mortgage home refinance applications.

In 2001 Mellon Bank sold its Mid-Atlantic retail franchise of 345 branches to Citizens Bank.

Principal Officers

CEO

Martin McGuinn
500 Grant Street
One Mellon Place
Pittsburgh, PA
412-234-4981

CFO

Michael Bryson
500 Grant Street
One Mellon Place
Pittsburgh, PA
412-234-5000

Compliance Officer

John Chesko
500 Grant Street

One Mellon Place
Pittsburgh, PA
412-234-5000

Employees

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

Branches

Number of Branches (New England Region) - Total	1
Branches Within Boston PSMA	1
Number of ATMs	2
Number of Free-Standing ATMs	1

CRA Rating

Rating Agency	OCC
Most Recent Rating	2001
Overall Rating	OUTSTANDING ⁸¹
Lending Test Rating	OUTSTANDING
Investment Test Rating	OUTSTANDING
Service Test Rating	HIGH SATISFACTORY

⁸¹ Based on most recent CRA Performance Evaluation by OCC published 2001.



Discussion

Overall Rating: OUTSTANDING⁸²

In the year 2001, Mellon maintained no retail presence in New England. Mellon Bank provides corporate and institutional services, both nationally and globally. As such, Mellon Bank has provided proposals to the City of Boston. No HMDA or low-income mortgage information is available for Mellon Bank within the Boston MSA. Reports and information are available for those areas served by Mellon. Following is an overview of the CRA data for Mellon Bank N.A. focusing on CRA-reportable data in the Philadelphia, PA MSA.

Lending Test

Lending Test Rating: OUTSTANDING⁸³

General Responsiveness to Credit Needs

Mellon sold its mortgage company in 1999. This resulted in the Bank's exit from the home-purchase and first-mortgage-refinance business. Mellon serves most of Pennsylvania and small portion of southern New Jersey. Delivery systems are accessible to essentially all portions of the assessment area.

In 2001 Mellon Bank sold its Mid-Atlantic retail franchise of 345 branches to Citizens Bank of New England.

Community Development Lending

Mellon is a leader in community development lending. Through its MBCDC, specialized staff and expertise are available to assist organizations in sponsoring affordable housing and small business development projects and activities. Mellon has developed lending relationships to fund a diversity of programs including: affordable housing, micro businesses, social and community services, and non-profit housing organizations.

Innovative or Flexible Lending Practices

The following flexible credit practices are only offered in the Philadelphia area.

- Philadelphia Home Improvement Loan Program
- The Philadelphia Homeownership Rehabilitation Program
- Neighborhood Home Improvement Loan (NHIL): Since the prior CRA evaluation, Mellon developed and implemented Neighborhood Home Improvement Loan (NHIL) programs to provide a flexible and below market rate mortgage program for low and moderate-income borrowers.

Investment Test

Investment Test Rating: OUTSTANDING⁸⁴

Mellon has demonstrated an excellent record of providing community development investments in the Philadelphia MSA.

During the evaluation period, Mellon provided a significant number and dollar volume of qualified investments. Mellon has 53 qualified investments outstanding, totaling nearly \$68 million. In addition, Mellon has provided an additional \$2.5 million in qualifying investments through 143 grants and sponsorships to various community organizations.

Service Test

Service Test Rating: HIGH SATISFACTORY⁸⁵

Mellon's delivery systems are readily accessible to essentially all portions of the assessment area. 18% of Mellon's branches and stand-alone ATMs are located in low or moderate-income census tracts.

All products and services are consistent throughout Mellon's assessment area. Mellon offers a full range of retail products to customers and small business owners. Branch hours vary based on needs of the location.

Throughout the assessment area, employees of Mellon volunteer and serve on boards of community organizations which provide community development services.

⁸² Based on most recent CRA Performance Evaluation by OCC published 2001.

⁸³ Ibid.

⁸⁴ Ibid.

⁸⁵ Ibid.



In 2001 Mellon Bank sold its Mid-Atlantic retail franchise of 345 branches to Citizens Bank of New England.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	499	369	NA
HMDA Loans Originated	450	293	NA
Low-Income Applications Received	223	168	NA
Low-Income Loans Originated	197	127	NA

Mellon Bank, N.A. HMDA-reportable and low-income applications and originations decreased substantially from 1999 to 2000 in this MSA. Mellon sold its mortgage company in 1999. This resulted in the Bank's exit from the home purchase and first mortgage refinance business.

Small Business Loans

No 2001 HMDA reportable small business loan data was available for Mellon Bank.⁸⁶

Loan Information By Census Tract

Please refer to the addendum [The 2001 Linked Deposit Bank Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

⁸⁶ FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; April 23, 2001.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

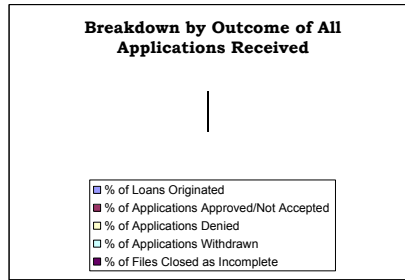
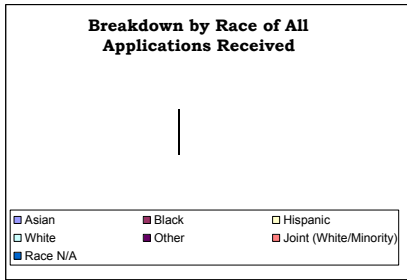
Mellon Bank web site
<http://www.mellon.com/>

Mellon Bank, N.A. Lending Information - HMDA

2001

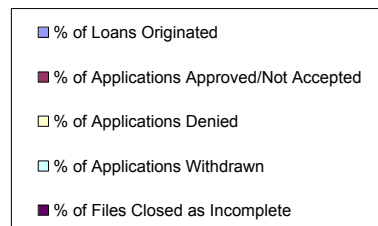
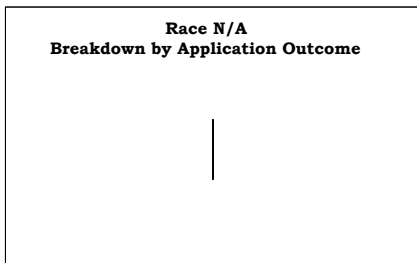
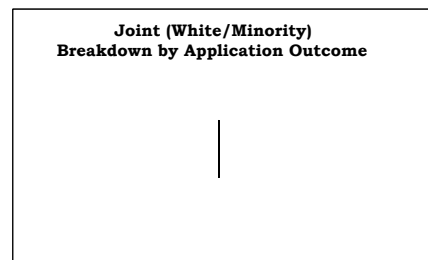
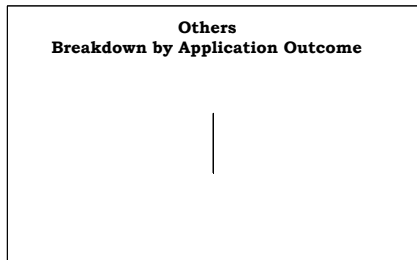
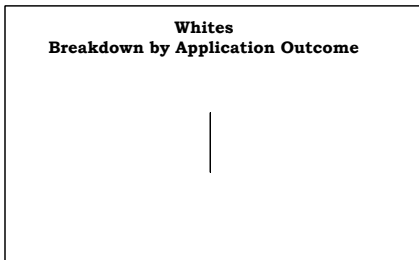
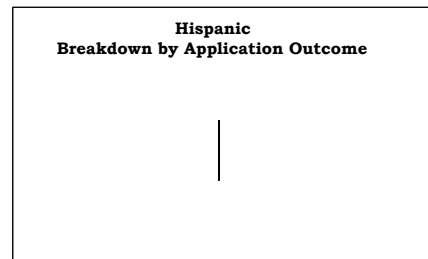
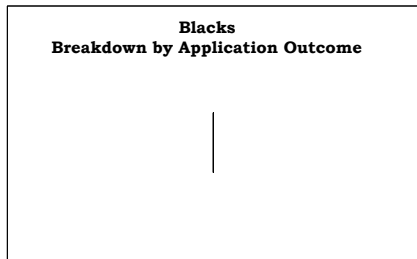
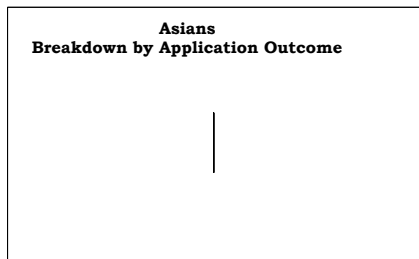
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	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%
Other	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 the applications received, those highlighted in blue are Loans Originated, all those highlighted in red were Not Accepted, etc.

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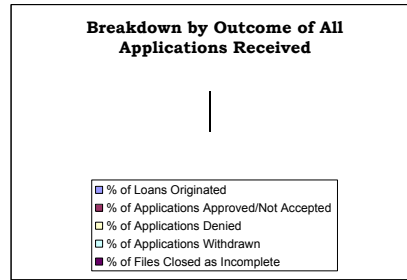
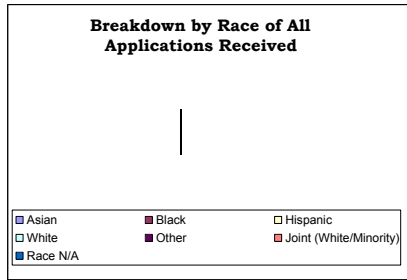


Mellon Bank, N.A. Low-Income Mortgage Information

2001

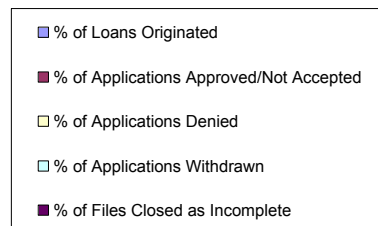
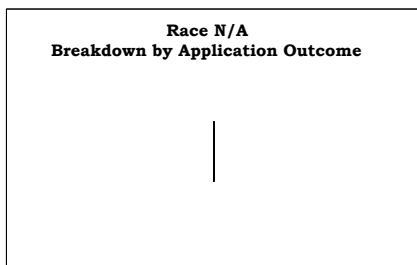
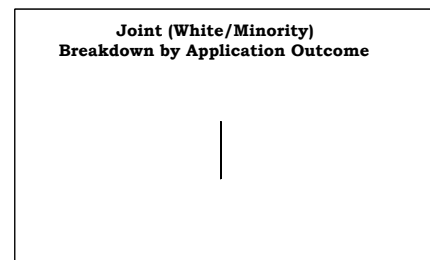
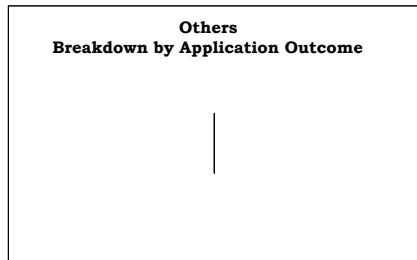
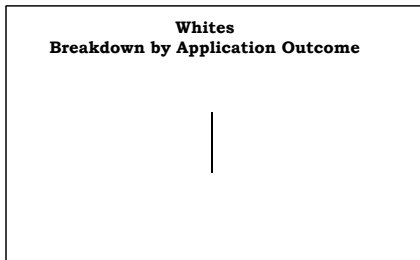
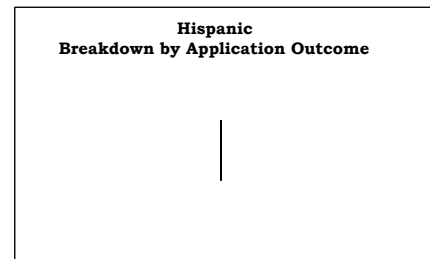
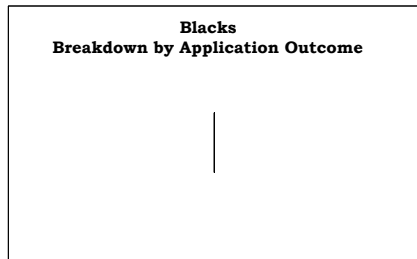
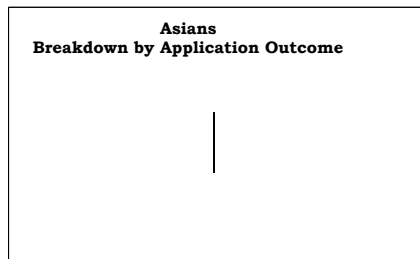
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	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%
Other	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 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.





HMDA and Low-Income Compared against the MSA Aggregate Total

No data available



Employment Information

No data available





Sovereign Bank



Overview

Sovereign Bank New England
75 State Street
Boston, MA

Parent company: Sovereign Bancorp

Description

Sovereign Bank established a full banking presence within the City of Boston on June 15, 2001 and within the Boston MSA on July 25, 2001. Sovereign Bank established market share in New England by purchasing over 280 branches from Fleet Bank. It was not until 2001 that the Commercial Real Estate team was able to begin reviewing new transactions. Regarding mortgage initializations, Sovereign Bank commenced its mortgage sales operation in the fall of 2001.

Principal Officers

CEO

John Hamill
75 State Street
Boston, MA
617-757-3434

President/New England

Joseph Campanelli
75 State Street
Boston, MA
617-757-3444

Chief Compliance Officer

Jack V. Killen
Villanova, PA
610-526-6226

Compliance Officer, New England

Thomas Kennedy
75 State Street
Boston, MA
617-757-3419

Employees

Number of Employees	1973
Number of Employees in Massachusetts	1973
Percentage of Women Employees	73.7%
Percentage of Minority Employees	25.2%

Branches

Number of Branches - Total	285
Branches Within Boston PSMA	29
Number of ATMs	20
Number of Free-Standing ATMs	NA

CRA Rating

Rating Agency	OTS
Most Recent Rating	2000
Overall Rating	SATISFACTORY ⁸⁷
Lending Test Rating	LOW SATISFACTORY
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	LOW SATISFACTORY

⁸⁷ Based on most recent CRA Performance Evaluation by OTS for Sovereign Bank Massachusetts published 2000.



Discussion

Overall rating: SATISFACTORY⁸⁸

Lending Test

Lending Test Rating: LOW SATISFACTORY⁸⁹

The most recent CRA report for Sovereign Bank is from November 1, 2000, and predates the rollout of branches across New England. It should be noted that Sovereign Bank established a full banking presence within the City of Boston on June 15, 2001 and within the Boston MSA on July 25, 2001. It was not until 2001 that the Commercial Real Estate team was able to begin reviewing new transactions.

The following information was obtained from the "Community Investment Agreement" dated March 7, 2000. Sovereign Bank and the Community Advisory Committee generated this report.

General Responsiveness to Credit Needs

Sovereign Bank New England (SBNE) has made a commitment for the years 2000, 2001 and 2002 with the Community Advisory Committee (CAC) that contains specific goals for loans, investments, and services. SBNE will negotiate with CAC in 2002 regarding specific goals for 2003 and 2004.

SBNE will create a Commonwealth Advisory Committee for Massachusetts. This Committee will be responsible for monitoring and advising SBNE on the execution of the bank's CRA plan, as well as any specific agreements, including, but not limited to, the CAC agreement.

Responsiveness to Low and Moderate-Income Credit Needs

Sovereign Bank New England commits to lend a minimum of \$162 million in low and moderate-income mortgages in Massachusetts through the year 2002. The Bank will utilize ACORN and Soft Second mortgage programs that offer low cost, flexible credit underwriting criteria, in addition to other affordable mortgage products.

The bank agrees to lend \$75 million of the \$162 million to the ACORN and Soft Second mortgage programs.

The CAC will work with Sovereign to develop programs that help achieve common goals to increase community access to affordable mortgages to low and moderate-income, and minority borrowers.

SBNE will work to reduce loan defaults and foreclosures by contracting with counseling agencies on a fee-for-service basis that employs comprehensive pre and/or post purchase counseling programs.

Leadership in Community Development Loans

As part of Sovereign's commitment to New England, Sovereign will make available \$5 million annually in loans and investments in the Boston Empowerment Zone.

Sovereign commits to lend a minimum of \$97 million in community development financing in Massachusetts, during the term of this agreement, for affordable housing projects and commercial real estate sponsored by and for non-profit organizations. The Bank will target 60% of its commitment to housing projects and 40% to commercial real estate that will benefit low and moderate-income communities.

Sovereign Bank will also participate in investment programs to develop low-income housing through federal and Massachusetts' low-income housing tax credit programs and historic tax credits. The goal for investments in the federal low-income housing tax credit program will be \$10 million by 2002.

Sovereign Bank New England will also contribute to community development activities amounting to at least \$250,000 in the year 2000 and at least \$500,000 annually in 2001 and 2002.

This grant will target:

- Affordable housing, including: home buyer and home owner counseling, the development of affordable rental and special needs housing, and related programs for low and moderate-income individuals.
- Community and economic development, including: small business technical

⁸⁸ Based on most recent CRA Performance Evaluation by OTS for Sovereign Bank Massachusetts published 2000.

⁸⁹ Ibid.



assistance, entrepreneur training, job training and workforce development programs, and the development of commercial or industrial real estate.

- Economic education, including: credit counseling; and programs expanding access to credit and banking services for both low and moderate-income, and minority communities;
- Civil rights related advocacy, such as: community organizing, diversity education, expanding awareness and understanding of racial and gender economic disparities, research and litigation to enforce civil rights laws, and other such efforts that can affect public policy and business practices.

Investment Test

Investment Test Rating: LOW SATISFACTORY⁹⁰

Sovereign Bank will invest \$2 million in equity positions through the year 2002 in community-based equity and loan providers, such as: CDFI's CDCs; loan pools; and various collaboratives that serve at least 75% minority and women-owned businesses, low and moderate-income owned businesses, or businesses that serve low and moderate-income areas.

As part of Sovereign Bank's commitment to New England, they will make available \$5 million annually in loans and investments in the Boston Empowerment Zone.

While virtually all of the community development loans were purchased from Fleet Boston Financial, the large dollar amount shows that Sovereign Bank has made a financial commitment to the assessment area.⁹¹

Service Test

Service Test Rating: LOW SATISFACTORY⁹²

Sovereign Bank will allow all branches purchased in low and moderate-income areas to remain open for one year after the final divestiture closing date. Beyond that year, the

bank will seek input from the Community Advisory Committee upon consideration, and before filing, for any branch closing in low and moderate-income, or minority areas.

According to the Office of Thrift Supervision, more than one-fourth of offices in the assessment area are in low and moderate-income geographies.

Description Service Delivery Systems

Sovereign Bank commits to a goal of opening 10,000 basic banking accounts and free checking accounts by 2002 in Massachusetts.

Sovereign will offer bilingual services consistent with the needs of various communities it serves.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1 Beacon Street Boston, MA		✓
67 Beacon Street Boston, MA		✓
3060 Washington Street Boston, MA		✓
125 Causeway Street Boston, MA		✓
One Federal Street Boston, MA		✓
61 Harrison Avenue Boston, MA		✓
100 Oliver Street Boston, MA		✓
552 Commonwealth Avenue Boston, MA		✓
43 Kneeland Street Boston, MA		✓
6 Francis Street Boston, MA		✓
287 Hanover Street Boston, MA		✓
61 Arlington Street Boston, MA		✓
800 Boylston Street Boston, MA		✓
950 American Legion Hwy Boston, MA		✓
164 Northern Avenue Boston, MA		✓

⁹⁰ Rated by the Office of Thrift Supervision for the Boston, Worcester and Lawrence CMSA, September 2000.

⁹¹ Office of Thrift Supervision, Large Institution Performance Evaluation, 11/01/2000.

⁹² Ibid.



Two South Station Concourse	✓
Boston, MA	
75 State Street	✓
Boston, MA	
125 Summer Street	✓
Boston, MA	
2 Westland Street	✓
Boston, MA	
30 Winter Street	✓
Boston, MA	
427 Rutherford Avenue	✓
Charlestown, MA	
Martin Luther King Blvd	✓
Roxbury, MA	
474 Broadway	✓
South Boston, MA	
1850 Centre Street	✓
West Roxbury, MA	
2 Meridian Street	✓
East Boston, MA	
2 Morrissey Blvd	✓
Dorchester, MA	
572 Freeport Street	✓
Dorchester, MA	
494 Gallivan Blvd	✓
Dorchester, MA	
585 Columbia Road	✓
Dorchester, MA	
FSB: Full Service Branch	

Year-Over-Year at a Glance

		2000	2001
HMDA Applications Received		557	644
HMDA Loans Originated		441	502
Low-Income Applications Received		9	30
Low-Income Loans Originated		5	19

The lending information included in this report is for Sovereign Bank in Philadelphia. New England data is not available for 2001. Regarding mortgage initializations, Sovereign Bank commenced its mortgage sales operation in the fall of 2001.

Small Business Loans

Please refer to the addendum [The 2001 Linked Deposit Bank 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 2001 is also compared to the 2001 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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum [The 2001 Linked Deposit Bank 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 Thrift Supervision;
November 1, 2000.

Community Investment Agreement, Community
Advisory Committee and Sovereign Bank New
England; March 7, 2000.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of the Governors of
the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

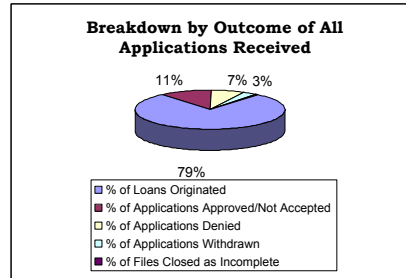
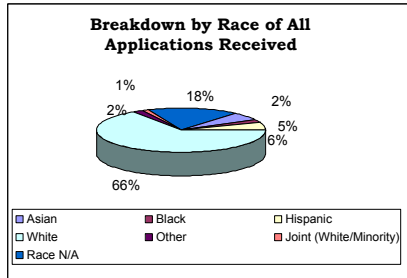
Sovereign Bank website
<http://www.sovereignbank.com/>

Sovereign Bank (Philadelphia, PA) Lending Information - HMDA

2001

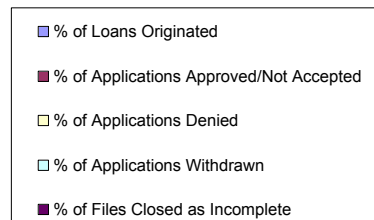
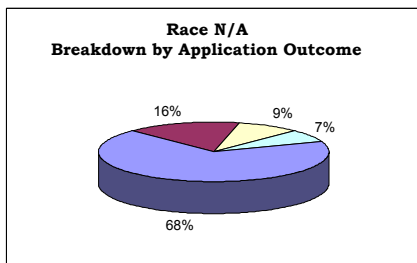
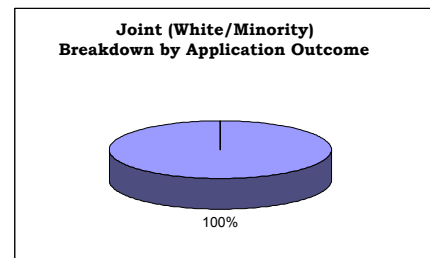
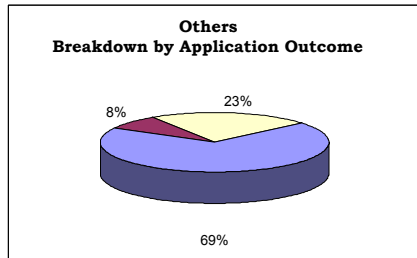
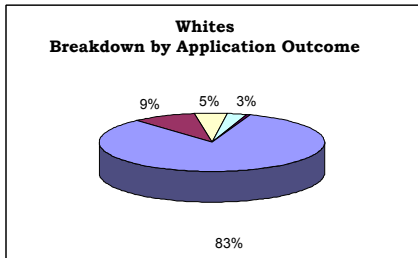
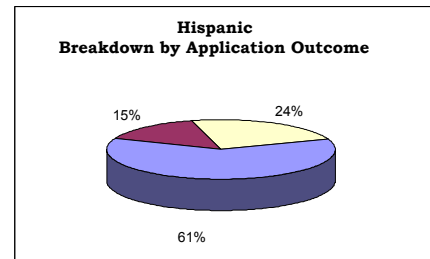
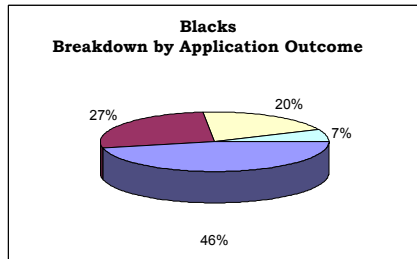
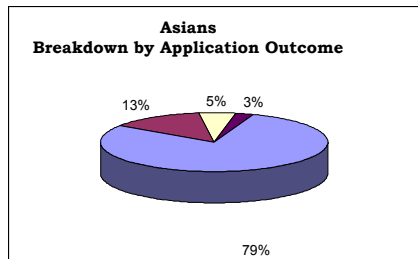
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	38	6%	30	79%	5	13%	2	5%	0	0%	1	3%
Black	15	2%	7	47%	4	27%	3	20%	1	7%	0	0%
Hispanic	34	5%	21	62%	5	15%	8	24%	0	0%	0	0%
White	425	66%	352	83%	39	9%	20	5%	12	3%	2	0%
Other	13	2%	9	69%	1	8%	3	23%	0	0%	0	0%
Joint (White/Minority)	6	1%	6	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	113	18%	77	68%	18	16%	10	9%	8	7%	0	0%
Total	644	100%	502	78%	72	11%	46	7%	21	3%	3	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 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.

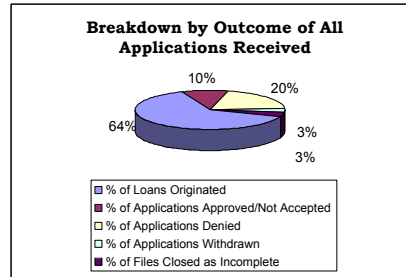
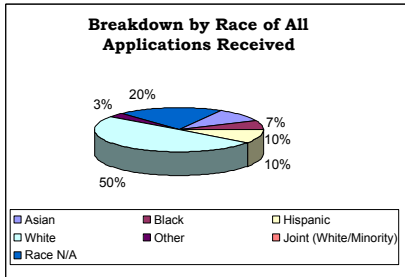


Sovereign Bank (Philadelphia, PA) Low-Income Mortgage Information

2001

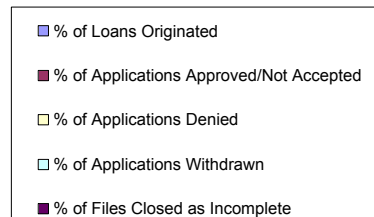
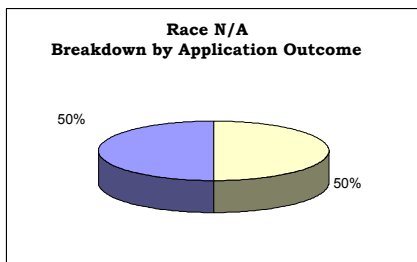
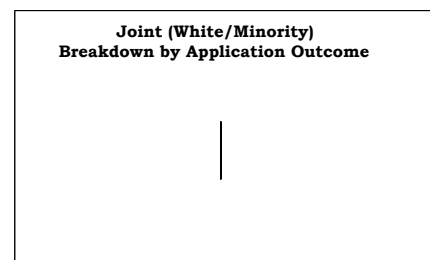
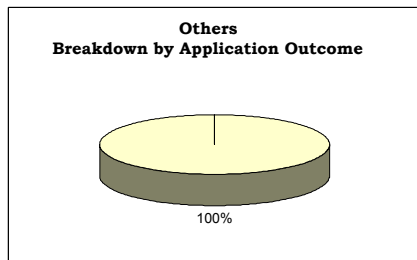
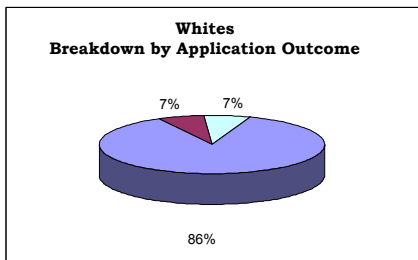
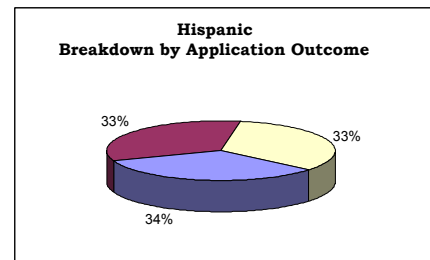
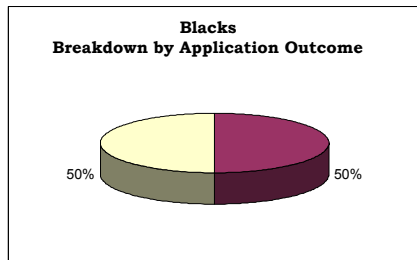
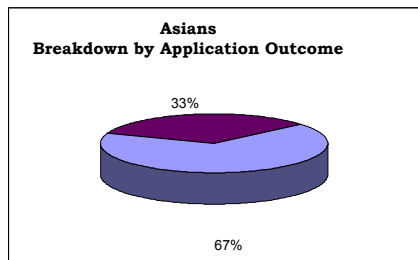
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	3	10%	2	67%	0	0%	0	0%	0	0%	1	33%
Black	2	7%	0	0%	1	50%	1	50%	0	0%	0	0%
Hispanic	3	10%	1	33%	1	33%	1	33%	0	0%	0	0%
White	15	50%	13	87%	1	7%	0	0%	1	7%	0	0%
Other	1	3%	0	0%	0	0%	1	100%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	6	20%	3	50%	0	0%	3	50%	0	0%	0	0%
Total	30	100%	19	63%	3	10%	6	20%	1	3%	1	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.



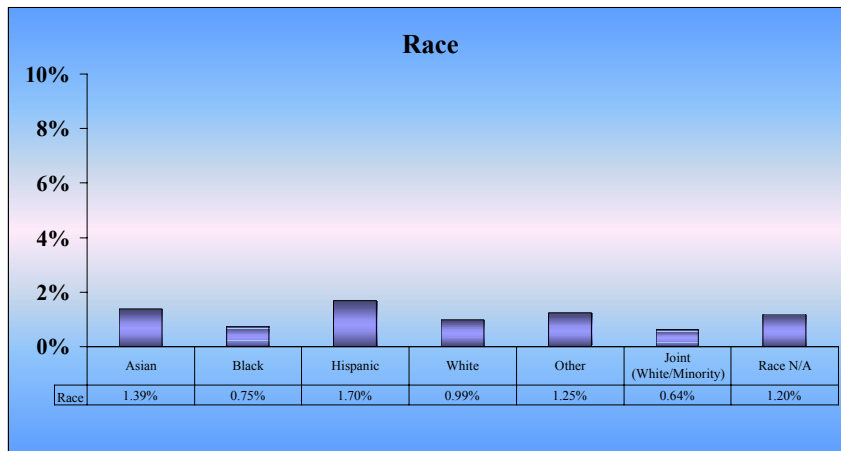
Compared against the MSA Aggregate Total

2001

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
Asian	38	1.39%	30	1.42%	5	2.33%	2	0.93%	0	0.00%	1	3.70%
Black	15	0.75%	7	0.55%	4	2.55%	3	0.80%	1	0.69%	0	0.00%
Hispanic	34	1.70%	21	1.52%	5	3.82%	8	2.56%	0	0.00%	0	0.00%
White	425	0.99%	352	1.02%	39	1.18%	20	0.71%	12	0.58%	2	0.41%
Other	13	1.25%	9	1.21%	1	1.41%	3	2.31%	0	0.00%	0	0.00%
Joint (White/Minority)	6	0.64%	6	0.81%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	113	1.20%	77	1.19%	18	1.95%	10	1.07%	8	0.83%	0	0.00%
Total	644	1.05%	502	1.07%	72	1.48%	46	0.95%	21	0.58%	3	0.38%

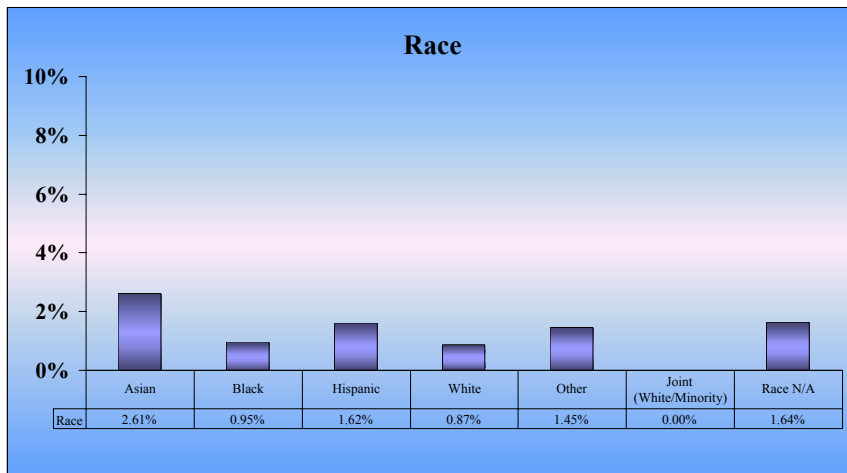
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



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
Asian	3	2.61%	2	2.35%	0	0.00%	0	0.00%	0	0.00%	1	50.00%
Black	2	0.95%	0	0.00%	1	12.50%	1	2.50%	0	0.00%	0	0.00%
Hispanic	3	1.62%	1	0.90%	1	20.00%	1	2.17%	0	0.00%	0	0.00%
White	15	0.87%	13	1.10%	1	0.95%	0	0.00%	1	0.85%	0	0.00%
Other	1	1.45%	0	0.00%	0	0.00%	1	4.55%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	6	1.64%	3	1.66%	0	0.00%	3	3.06%	0	0.00%	0	0.00%
Total	30	1.12%	19	1.09%	3	1.84%	6	1.16%	1	0.48%	1	2.08%

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



Wainwright Bank



Overview

Wainwright Bank & Trust
63 Franklin Street
Boston, MA

Description

Wainwright Bank & Trust is a \$373 million state chartered, investor-owned bank, headquartered in Boston. Their primary focus is commercial lending.

Principal Officers:

CEO

Jan Miller
63 Franklin Street
Boston, MA
617-478-4000

CFO

James Barrett
63 Franklin Street
Boston, MA
617-478-4000

Chief Compliance Officer

Pam Feingold
63 Franklin Street
Boston, MA
617-478-4000

Employees

Number of Employees	119
Number of Employees in Massachusetts	119
Percentage of Women Employees	70%
Percentage of Minority Employees	40%

Branches

Number of Branches - Total	8
Branches Within Boston PSMA	3
Number of ATMs	8
Number of Free-Standing ATMs	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2002
Overall Rating	OUTSTANDING ⁹³
Lending Test Rating	HIGH SATISFACTORY ⁹⁴
Investment Test Rating	OUTSTANDING ⁹⁵
Service Test Rating	OUTSTANDING ⁹⁶

⁹³ Based on most recent CRA Performance Evaluation by FDIC published 2002.

⁹⁴ Ibid.

⁹⁵ Ibid.

⁹⁶ Ibid.



Discussion

Overall rating: OUTSTANDING⁹⁷

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁹⁸

General Responsiveness to Credit Needs

The bank is primarily a commercial lender with a very strong emphasis on community development lending. Management has promoted the bank as an institution that actively supports “socially responsible” issues, such as: affordable housing, community development, women’s rights, the concerns of the gay and lesbian community, and the homeless.⁹⁹ 2001 marked the second year of Wainwright Bank & Trust’s expansion in the mortgage lending area. Significant increases were noted in both the number of mortgage applications received and mortgage originations. The bank was able to originate 61 of 77 mortgage loans reported in the 2001 HMDA data.

Responsiveness to Low and Moderate-Income Credit Needs

Overall, the bank’s residential mortgage originations are well disbursed throughout all segments of its assessment area. Further, according to the 2002 CRA report, given local demographic and owner occupancy characteristics, the bank has been able to penetrate a majority of the area’s low and moderate-income geographies in relation to the total number of loans originated.

In addition to conventional mortgage products, Wainwright Bank & Trust offers the following innovative and flexible residential mortgage products:

- Wainwright 5/1 Affordable Mortgage
- Massachusetts Housing Partnership Soft Second Program
- MHFA Lead Abatement Program
- Municipal Employee Loan Program
- MBTA Mortgage Program

⁹⁷ Based on most recent CRA Performance Evaluation by FDIC published by 2002.

⁹⁸ Ibid.

⁹⁹ Ibid.

Leadership in Community Development Loans

Wainwright Bank & Trust has continued to demonstrate exceptional effort in designing and participating in a variety of flexible and innovative programs that are aimed at meeting the needs of individuals throughout the City of Boston and the Commonwealth of Massachusetts.

In the 2002 FDIC CRA report, Wainwright Bank & Trust reported the origination of 63 community development loans totaling \$33.6 million since the 1999 FDIC CRA report.

Investment Test

Investment Test Rating: OUTSTANDING¹⁰⁰

Wainwright Bank & Trust has taken a leadership role in investing in organizations that support affordable housing and economic development activities throughout its assessment area. Since the 1999 FDIC CRA examination, the bank has added the following equity investments, at least two of which can be classified as “innovative or complex”:

- Ruggles Street Limited Partnership
- Pond Home Assisted living
- Massachusetts Housing Investment Limited Liability Corporation
- Wainwright Bank Donor Advised Fund
- Wainwright Virtual Community Room

Service Test

Service Test Rating: OUTSTANDING¹⁰¹

Description Service Delivery Systems

The services that the bank provides are readily accessible to all segments of the local population. Wainwright Bank & Trust operates 9 full-service branches; 3 of these branches are located in Boston. Of the total number of branches: 2 are located in low-income neighborhoods, 2 are located in moderate-income neighborhoods, 4 are located in middle-income areas, and one in an upper-income neighborhood.

¹⁰⁰ Ibid.

¹⁰¹ Ibid.



Wainwright Bank & Trust retail delivery includes the following channels and special services:

- 24 hour ATM machines at each branch;
- On-line banking, including on-line bill pay
- Bilingual employees available at all locations.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
63 Franklin Street Boston, 02110*	✓	✓
One Broadway Cambridge, 02142	✓	✓
44 Brattle Street Cambridge, 02138	✓	✓
155 Dartmouth Street Boston, 02116	✓	✓
176 Alewife Brook Pkwy Cambridge, 02138	✓	✓
687 Centre Street Boston, 02130*	✓	✓
One Church Street Watertown, 02472	✓	✓
647 Mass Ave. Cambridge, 02138	✓	✓

FSB: Full Service Branch

*Branches and ATMs located in low and moderate-income geographies.

Special Programs

Wainwright Bank & Trust employs a full time community representative. This employee acts as a liaison between the bank and the community, continually assesses the needs of its low and moderate-income residents and geographies, and participates with management in developing products and services to help meet them.

Additional Information

The bank's commitment to diversity is across-the-board, with staff at all levels reflecting the community and the customer base. Half of the banking officers are women, and fifty percent of the board of directors is comprised of women, minorities, gays and lesbians. The staff is cumulatively fluent in 17 languages.

Year-Over-Year at a Glance

	1999	2000	2001
HMDA Applications Received	56	45	50
HMDA Loans Originated	47	40	43
Low-Income Applications Received	2	3	1
Low-Income Loans Originated	2	2	1

Small Business Loans

Please refer to the addendum [The 2001 Linked Deposit Bank Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Wainwright Bank in the year 2001 is also compared to the 2001 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 2001 and the dollar amount of the loans provided. A discussion of the data section follows each chart.

Loan Information By Census Tract

Please refer to the addendum [The 2001 Linked Deposit Bank 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 Deposit Insurance
Corporation; June 10, 2002.

FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of Governors of the
Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

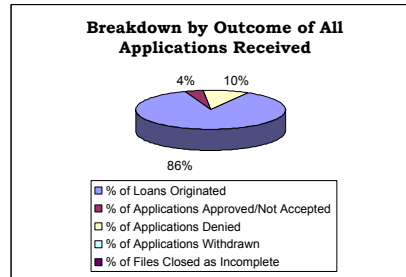
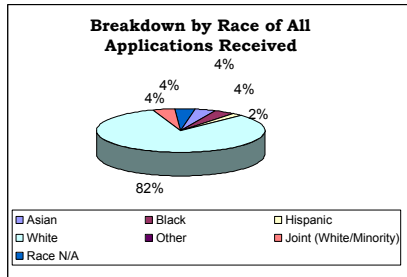
Wainwright Bank website
<http://www.wainwrightbank.com/>

Wainwright Bank Lending Information - HMDA

2001

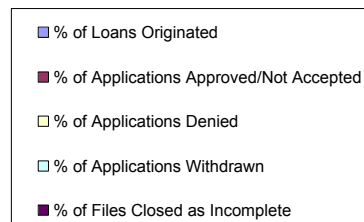
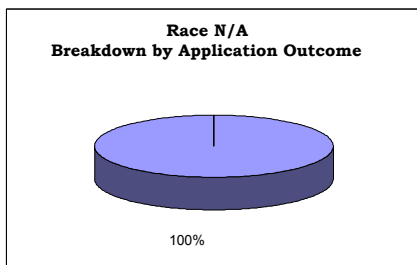
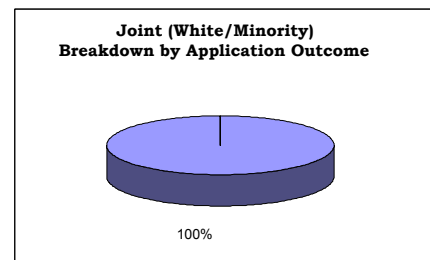
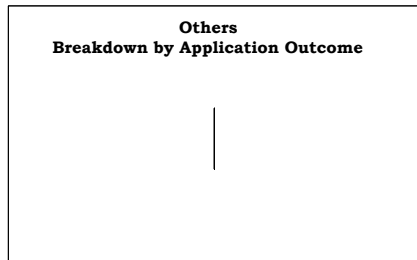
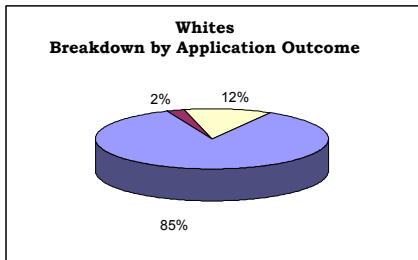
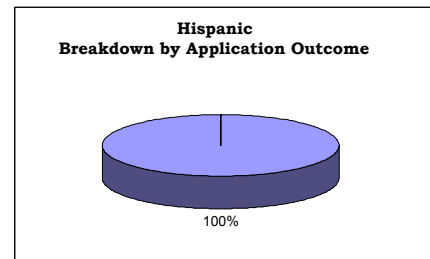
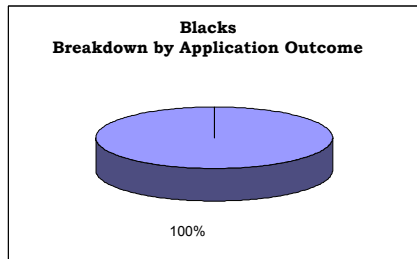
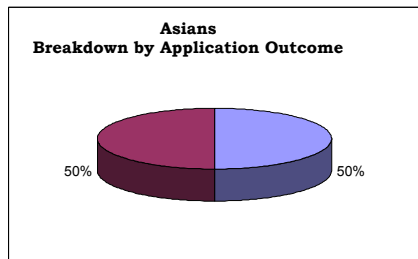
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	2	4%	1	50%	1	50%	0	0%	0	0%	0	0%
Black	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Hispanic	1	2%	1	100%	0	0%	0	0%	0	0%	0	0%
White	41	82%	35	85%	1	2%	5	12%	0	0%	0	0%
Other	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	2	4%	2	100%	0	0%	0	0%	0	0%	0	0%
Total	50	100%	43	86%	2	4%	5	10%	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 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.

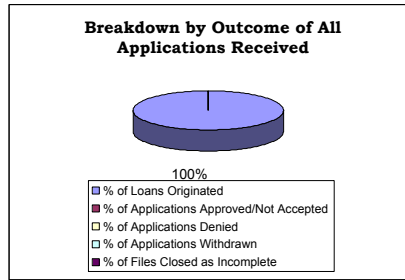
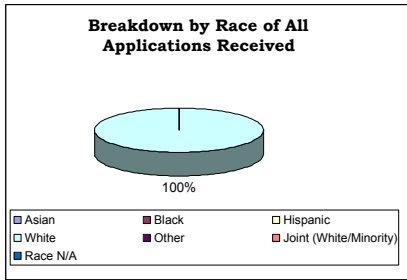


Wainwright Bank Low-Income Mortgage Information

2001

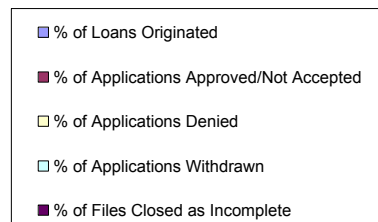
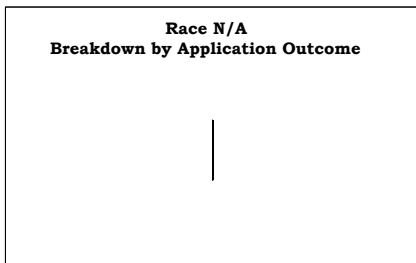
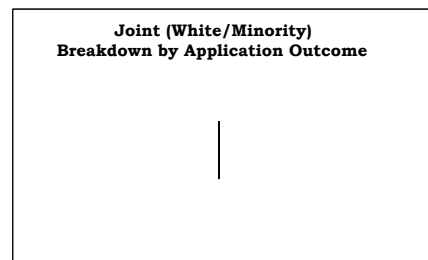
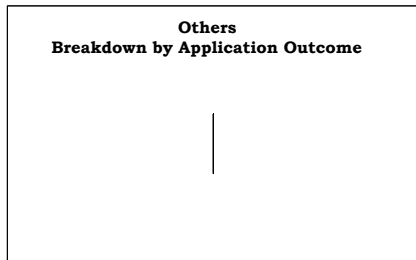
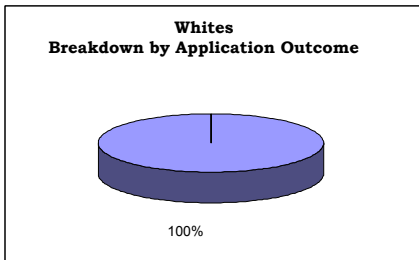
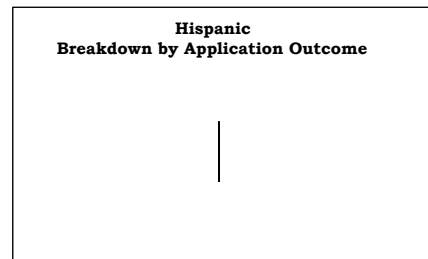
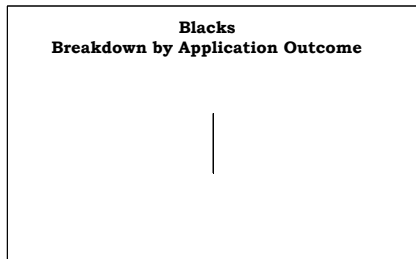
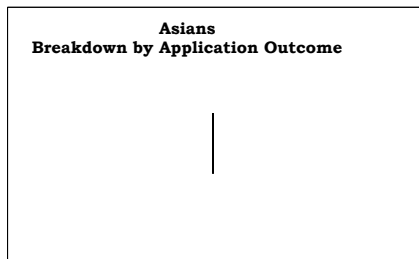
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	1	100%	1	100%	0	0%	0	0%	0	0%	0	0%
Other	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	1	100%	1	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 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.



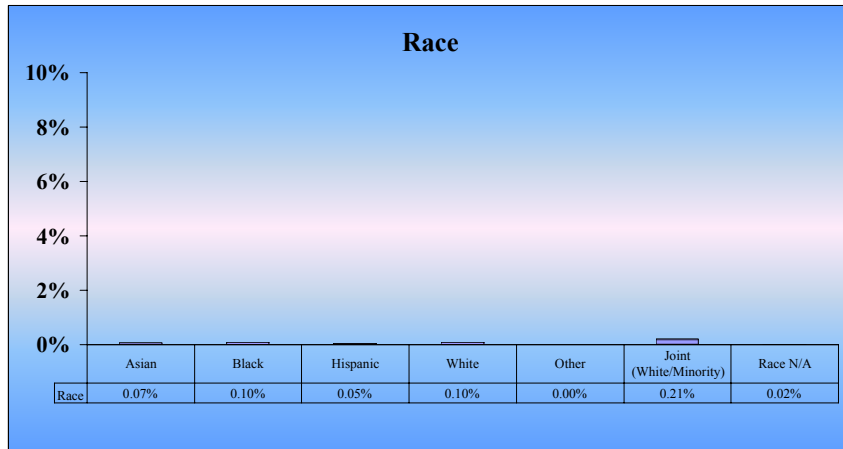
Compared against the MSA Aggregate Total

2001

Wainwright 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
Asian	2	0.07%	1	0.05%	1	0.47%	0	0.00%	0	0.00%	0	0.00%
Black	2	0.10%	2	0.16%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	1	0.05%	1	0.07%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	41	0.10%	35	0.10%	1	0.03%	5	0.18%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	2	0.21%	2	0.27%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	2	0.02%	2	0.03%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	50	0.08%	43	0.09%	2	0.04%	5	0.10%	0	0.00%	0	0.00%

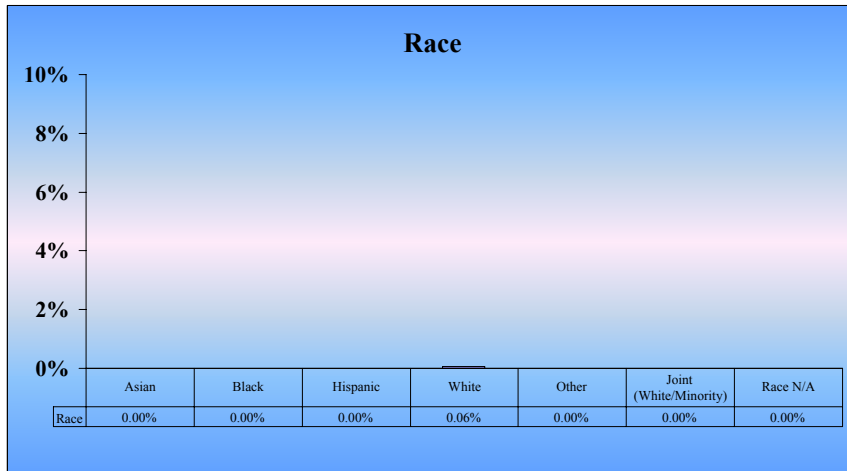
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.
For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Wainwright Bank Low-Income Mortgage Information

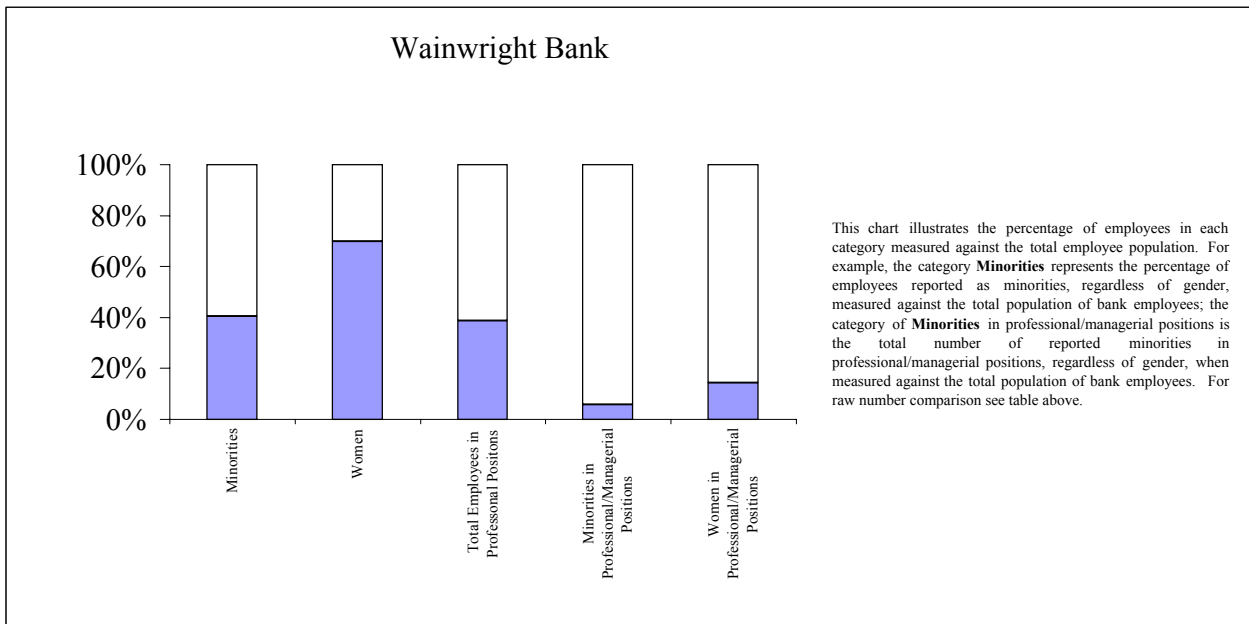
Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Asian	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Black	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Hispanic	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
White	1	0.06%	1	0.08%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Joint (White/Minority)	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Race N/A	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Total	1	0.04%	1	0.06%	0	0.00%	0	0.00%	0	0.00%	0	0.00%

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.



Wainwright Bank Employment Information

	Number of Employees	Percent of Total Employees
Total	119	
Minorities	48	40%
Women	83	70%
Total Employees In Professional Positions	46	39%
Minorities in Professional or Managerial Positions	7	6%
Women in Professional or Managerial Positions	17	14%







Appendix A



Appendix A

List of Source Documents

Boston Bank of Commerce

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; November 15, 1999.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

Boston Bank of Commerce website.
<http://www.oneunited.com/>

Boston Private Bank

Annual CRA Report to the Massachusetts Commissioner of Banks, Commonwealth of Massachusetts, May 6, 2002.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System, 2001.

Boston Private Bank website
<http://www.bostonprivatebank.com/>

Century Bank & Trust

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation, June 10, 2002.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System, 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates, March 2002.

Century Bank website
<http://www.century-bank.com/>

Citizens Bank of Massachusetts:

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; October 12, 1999.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of Governors of the Federal Reserve System; 2001.

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Citizens Bank Annual Report; 2001.

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

East Boston Savings Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; November 13, 1999.

Community Reinvestment Act Performance Evaluation, Massachusetts Division of Banks, January 22, 2002.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

East Boston Savings Bank website
<http://www.ebsb.com/>



Eastern Bank:

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; December 3, 2001.

Massachusetts Division of Banks, Summary Information for State Chartered Banks and Credit Unions. <http://db.state.ma.us/dob/in-choose.asp>

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

Eastern Bank website
<http://www.easternbank.com/>

Fleet Bank

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; July 23, 2001.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

Fleet Bank website
<http://www.fleet.com/home.asp>

Hyde Park Cooperative Bank

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; June 7, 1999.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

Hyde Park Cooperative Bank website
<http://www.hydeparkcooperative.com/>

Hyde Park Savings Bank

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; May 9, 2001.

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

Hyde Park Savings Bank website
<http://www.hydeparkbank.com/>

Liberty Bank & Trust

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; April 26, 1999. (Liberty Bank)

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; December 10, 2001. (General Bank)

FFIEC HMDA Aggregate & Disclosure Software Version 2.0, Board of the Governors of the Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

General Bank website
<http://www.generalbank.com/>

Mellon Bank, N.A.

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2000 Linked Deposit Report to the Mayor of the City of Boston, NobleAssociates; March 2002.

Mellon Bank web site
<http://www.mellon.com/>



Sovereign Bank

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Advisory Committee and Sovereign Bank New
England; March 7, 2000.

FFIEC HMDA Aggregate & Disclosure
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Sovereign Bank website
<http://www.sovereignbank.com/>

Wainwright Bank

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FFIEC HMDA Aggregate & Disclosure
Software Version 2.0, Board of Governors of the
Federal Reserve System; 2001.

2000 Linked Deposit Report to the Mayor of the
City of Boston, NobleAssociates; March 2002.

Wainwright Bank website
<http://www.wainwrightbank.com/>



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 of different sizes (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 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 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 effected 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

Earning 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 assess 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





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With over twenty years collective Government Banking and Diversity Management experience, NobleAssociates is an independent, woman-owned and operated business. NobleAssociates specializes in collecting, analyzing, preparing and documenting Financial Services information for the Public Sector.

For further information, contact us at our toll free number listed above or via email.