



2012 Linked Deposit Banking Report to the Mayor



CITY OF BOSTON





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The State of Banking in the City of Boston



Introduction: 2012

2012 was a year of recovery and rebuilding in Boston's housing markets. After the foreclosure crisis peaked in 2010, a more healthy and robust lending environment in Boston emerged in 2011 and 2012. This is due in no small part to the groundbreaking measures taken in Massachusetts and in Boston between 2007-2009 to reform the mortgage lending environment.

The crisis is far from over, as subprime mortgages originated in 2005-2006 are still defaulting at extremely high levels. Repeated intervention has only slowed, but not prevented, the foreclosure process. However, vigorous local action and the expanded influence of the CRA are laying the foundations for a healthy lending environment and sustained recovery in Boston.

The Beginnings Of Recovery

In 2012, Boston's housing market and lending environment continued its recovery from the mortgage and foreclosure crisis that began in 2006. This crisis originated in 2005 and 2006, in the confluence of high housing prices, high unemployment, low but rising interest rates, and — most importantly — the rise of out-of-state mortgage companies. These companies ushered in an array of risky mortgage loans, targeted to minority and low-income borrowers, including interest-only mortgages, adjustable-rate loans, and high-fee subprime loans. Many began at a low introductory rate, then reset to higher monthly payments. Even fixed-rate loans often required unsustainably high monthly payments. Falling home prices and a sluggish housing market have made it more difficult for homeowners unable to pay their mortgages to refinance or to sell and pay off their debts.

2012 saw significant improvements in many of the key metrics used to measure the foreclosure crisis. In Boston, foreclosure deeds fell by 41% from 2011, to 308—down from a peak of 1215 in 2008.¹ Housing prices in Boston have continued to rise, nearly reaching parity with their prices in 2005. At the same time, thanks to the Mayor's Office's multi-pronged distressed-building strategy, the number of distressed (i.e., abandoned) residential buildings in Boston

¹ City of Boston Department of Neighborhood Development, Foreclosure Trends Report 2012.

reached an all-time low in 2012. This contributed to stabilizing housing values, especially in those neighborhoods hit hardest by foreclosure.²

The foreclosure crisis in Boston is far from over, but 2012 saw signs of abating crisis and sustained recovery.

Failure Of Remedies

Despite these positive changes in 2012, the impact of the subprime lending bubble of 2005-2007 is still being felt in Boston. Subprime loans now make up a very small percentage of loans originated in Boston. However, the Boston Department of Neighborhood Development (DND) reports that the average time between mortgage origination and foreclosure was 3.0 years in 2009, 4.2 in 2010, 5.1 in 2011, and 6.1 years in 2012. In other words, the risky mortgages originated at the height of the lending bubble of 2005-2007 still make up the bulk of foreclosures in Boston, even six years later.

According to Jim Campen of the Massachusetts Community & Banking Council, “an extraordinarily high proportion of subprime loans have resulted in delinquencies and foreclosures.” At year-end 2010, for example, 55% of all subprime loans that have not already been foreclosed on were delinquent in their payments; 24% were more than 90 days delinquent; and 13.4% were in foreclosure.³

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

The federal government's main foreclosure-prevention initiative, the Federal Loan Modification Program, began in early 2009. By the end of the year it was already an acknowledged failure. Locally-based loan modification programs have also failed, though

² City of Boston Department of Neighborhood Development, Distressed Building Report 2012.

³ Jim Campen, Massachusetts Banking & Community Council, Changing Patterns XX.



pending legislation introduced by Mayor Menino will, if passed, force engagement by requiring mediation for all foreclosures in Boston.

State and local actions (including legislation and several lawsuits in the Supreme Judicial Court) have focused on the technicalities of foreclosures, especially on paperwork and chain-of-title issues. These, along with extensions of the right-to-cure from 30 to 150 days, have slowed the foreclosure process but done little to change the underlying issues — i.e., borrowers owing more for their homes than they can afford to pay back.⁴

Strengthened Foundations

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

The problematic lending practices that led to the crisis have all but disappeared from the Massachusetts lending landscape. Most notably, subprime lending has all but disappeared in Boston. In 2006, subprime lending comprised 25% of loans in Boston. In 2012, there were only 33 subprime loans in Boston (just 0.3% of all loans), down from 3,361 loans in 2006.⁵ This change alone eliminates one of the major causes of the housing crisis.

The collapse of subprime lending has been accompanied by a dramatic increase in the ratio of lending by Massachusetts banks and credit unions, and a corresponding drop in lending by out-of-state banks and mortgage companies, the

companies most likely to make risky or unsound loans. In 2012, Massachusetts banks and credit unions made 43.5% of all home purchase loans in Boston — more than twice as many as they made in 2005, when they made only 19.7%.⁶

These changes have laid the foundations for strength in Boston’s lending markets. The kinds of loans that caused the foreclosure crisis have disappeared from the market, and the most responsible group of lenders — Massachusetts banks — is now originating almost half of all loans.

One indicator of the strength of Boston’s current lending market is the relative share of government-backed loans — housing loans guaranteed by the FHA, VA, or USDA. A high prevalence of these loans indicates that borrowers are having trouble accessing traditional credit. Government-backed loan shares are substantially lower in Massachusetts than they are nation-wide: these loans comprise 23.8% of home loans nationally, and only 10.1% in Massachusetts and 6.8% in Boston.⁷ This demonstrates that borrowers in Massachusetts, and especially in Boston, are finding it substantially easier than their peers in other states to access conventional credit — showing that lending in Boston is healthier, more robust, and more sustainable than in other parts of the country.

Growing Importance Of The Cra

This positive change in the Massachusetts lending landscape is the result of a number of factors, including market changes that removed the secondary market for subprime loans, as well as local and federal legislation. New laws, including the Dodd-Frank Act and several Massachusetts statutes, expanded disclosure requirements for home mortgage lenders, tightened their underwriting standards, and banned those loan features deemed predatory.

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

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

⁵ Changing Patterns XX.

⁶ Changing Patterns XX.

⁷ Changing Patterns XX.



The historical success of the CRA provided a model for Massachusetts legislators seeking to expand oversight over non-bank licensed mortgage lenders. The 2007 “Act Protecting and Preserving Homeownership,” championed by Mayor Menino of Boston, provides for CRA-type oversight of mortgage lending companies that made 50 or more loans in Massachusetts in the previous year. Like CRA ratings, these “CRA for Mortgage Lenders” ratings are made public, and unsatisfactory ratings may result in the loss of the lender’s license.⁸

This legislative change, combined with the greatly increased lending share of Massachusetts banks, has restored the central importance of the CRA in establishing and maintaining a fair and healthy lending environment in Massachusetts.

In 2006, the CRA covered only 22% of all home loans in Massachusetts. In 2012, 43.5% of home loans were covered by the CRA, and 80.1% were covered by either the CRA or CRA-type oversight.⁹

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

Though the CRA still regulates less than half of mortgage lending in the state, it now covers its greatest market share in more than a decade, and shows signs of increasing further. The CRA has taken on renewed importance as a key regulator of lending activity in Massachusetts.

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

Lenders covered by the CRA extend a greater share of their loans to minority applicants, to

low- and moderate-income census tracts, and to low- and moderate-income individuals, than do lenders not covered by the CRA. CRA-covered lenders also direct a greater share of conventional prime loans (as opposed to government-backed loans) to all of these categories of traditionally underserved borrowers.¹⁰

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

Future Questions

Despite these positive changes, mortgage lending in Boston still faces a number of unresolved systemic issues. In particular, access to conventional credit for low-income and minority borrowers remains a problem in Boston.

Black and Latino borrowers in Boston received significantly fewer conventional loans than white borrowers. For example, in Boston, 21% of households are black, but in 2012, black borrowers received only 3.6% of non-government backed loans. Even upper-income minorities were far more likely than white borrowers to receive a government-backed loan.¹¹

In Boston, the government-backed loan share in low-income census tracts was 19.3%, versus just 4.7% in upper-income census tracts. The government-backed loan share in predominantly minority neighborhoods was 41.7%, versus 6.0% in predominantly white census tracts. Additionally, Black and Latino borrowers still face disproportionately high denial rates, even when adjusted for income. ¹²

These patterns mirror the prime-versus-subprime lending divisions that existed in the years before the disappearance of subprime lending. Government-backed loans are affordable and sustainable, but their prevalence among minorities and in lower-income census tracts is an indication that these groups still face deep access-to-credit issues. This raises the specter of

⁸ CRA for Mortgage Lenders - Ratings and Public Evaluations Website, Massachusetts Division of Banks.

⁹ Changing Patterns XX.

¹⁰ Changing Patterns XX.

¹¹ Changing Patterns XX.

¹² Changing Patterns XX.



the return of redlining and other unfair lending practices, including those that led to the foreclosure crisis.

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

2012 Boston MSA Comparative Charts

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

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

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

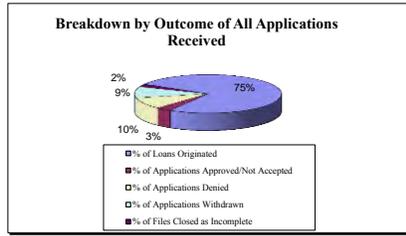
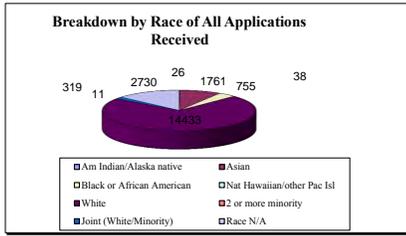
Aggregate Lending Information - HMDA

MSA: 14484 - Boston/Quincy, MA

2012

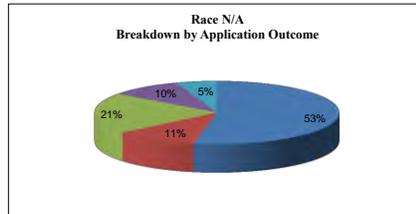
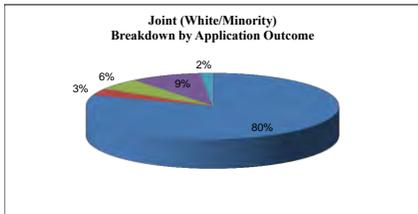
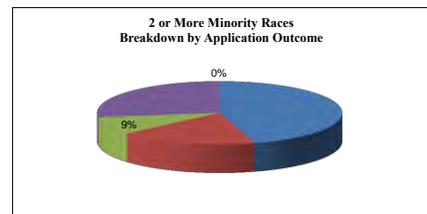
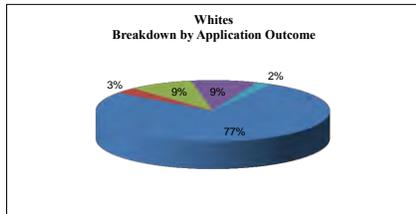
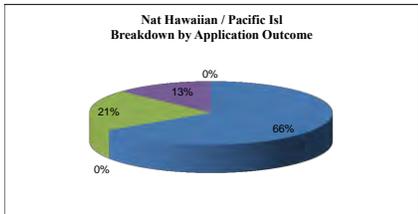
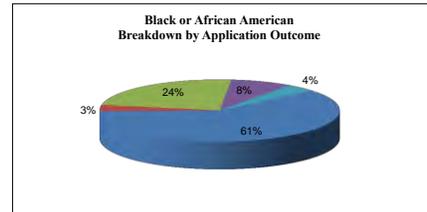
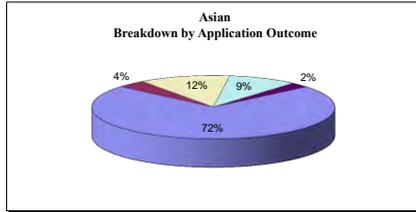
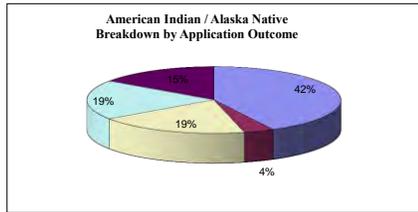
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	26	0%	11	42%	1	4%	5	19%	5	19%	4	15%
Asian	1761	9%	1273	72%	68	4%	213	12%	163	9%	44	2%
Black or African American	755	4%	458	61%	25	3%	179	24%	63	8%	30	4%
Nat Hawaiian/other Pac Isl	38	0%	25	66%	0	0%	8	21%	5	13%	0	0%
White	14433	72%	11058	77%	451	3%	1291	9%	1320	9%	313	2%
2 or more minority	11	0%	5	45%	2	18%	1	9%	3	27%	0	0%
Joint (White/Minority)	319	2%	256	80%	11	3%	18	6%	29	9%	5	2%
Race N/A	2730	14%	2017	74%	109	4%	232	8%	299	11%	73	3%
Total	20073	100%	15103	75%	667	3%	1947	10%	1887	9%	469	2%

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



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

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

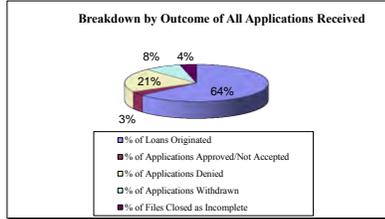
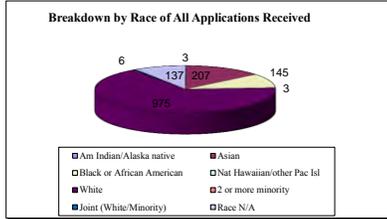


- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

Aggregate Low-Income Mortgage Lending MSA: 14484 - Boston/ Quincy, MA 2012

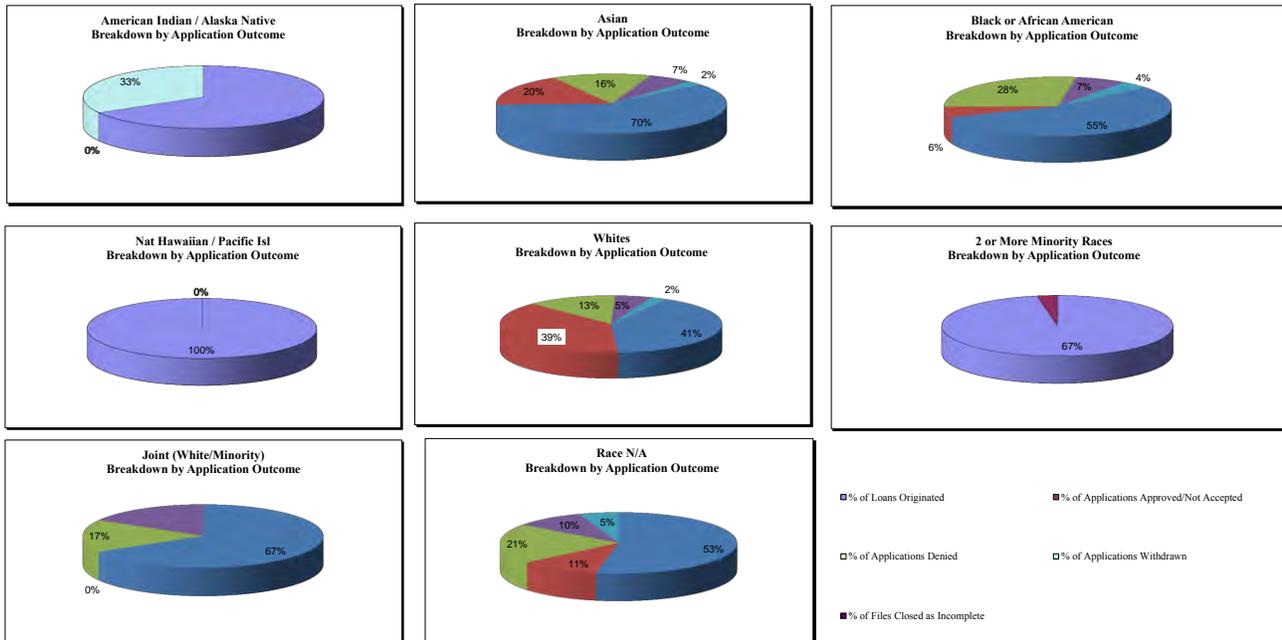
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	3	0%	2	67%	0	0%	0	0%	1	33%	0	0%
Asian	207	14%	144	70%	10	20%	33	16%	15	7%	5	2%
Black or African American	145	10%	83	57%	3	6%	42	29%	11	8%	6	4%
Nat Hawaiian/other Pac Isl	3	0%	3	100%	0	0%	0	0%	0	0%	0	0%
White	975	66%	624	64%	31	61%	202	21%	82	8%	36	4%
2 or more minority	3	0%	2	67%	1	2%	0	0%	0	0%	0	0%
Joint (White/Minority)	6	0%	4	67%	0	0%	1	17%	1	17%	0	0%
Race N/A	137	9%	78	57%	6	12%	31	23%	14	10%	8	6%
Total	1479	100%	940	64%	51	3%	309	21%	124	8%	55	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.

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

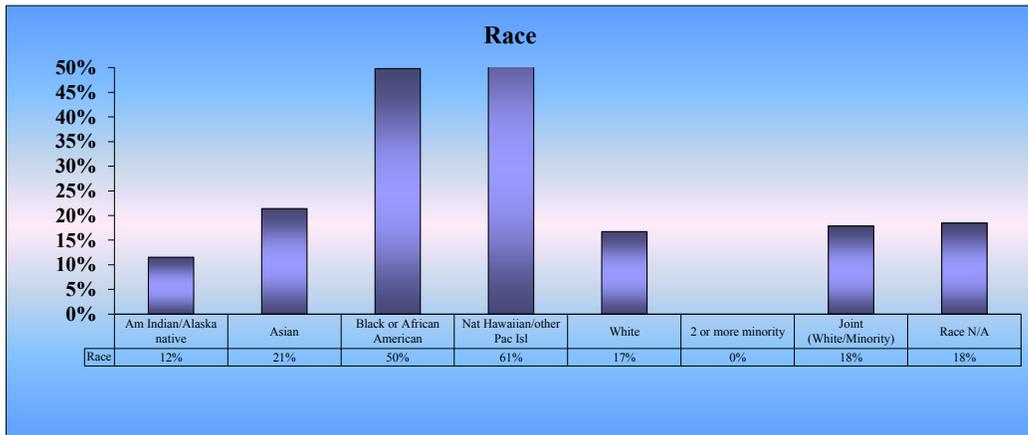


Link Deposit Report Banks Compared Against the MSA Aggregate Total 2012

HMDA Mortgage Information for Banks covered in this report

Race	Applications Received by banks	% of Applications Received in MSA	Loans Originated by banks	% of Loans Originated in MSA	Applications Approved/Not Accepted by banks	% of Applications Approved/Not Accepted in MSA	Applications Denied by banks	% of Applications Denied in MSA	Applications Withdrawn by banks	% of Applications Withdrawn in MSA	Files Closed as Incomplete by banks	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	3	12%	1	9%	0	0%	2	40%	0	0%	0	0%
Asian	377	21%	248	19%	12	18%	69	32%	35	21%	13	30%
Black or African American	376	50%	225	49%	13	52%	108	60%	20	32%	10	33%
Nat Hawaiian/other Pac Isl	23	61%	14	56%	0	0%	8	100%	1	20%	0	0%
White	2415	17%	1735	16%	90	20%	346	27%	184	14%	60	19%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	57	18%	46	18%	3	27%	3	17%	4	14%	1	20%
Race N/A	504	18%	327	16%	24	22%	70	30%	57	19%	26	36%
Total	3755	19%	2596	17%	142	21%	606	31%	301	16%	110	23%

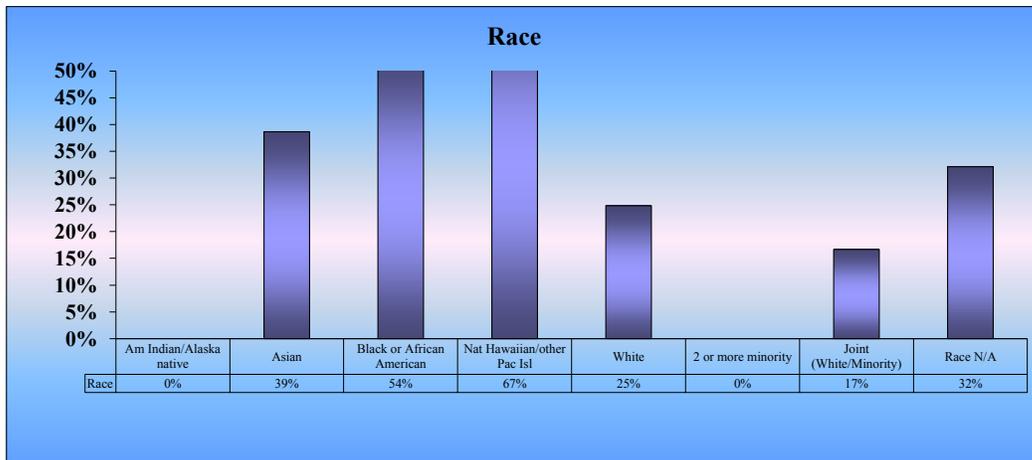
The chart below is the breakdown by race of the applications received collectively at the banks covered in this report (excluding Mellon) compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications processed collectively at the banks covered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



Low-Income Mortgage Information for Banks covered in this report

Race	Applications Received by banks	% of Applications Received in MSA	Loans Originated by banks	% of Loans Originated in MSA	Applications Approved/Not Accepted by banks	% of Applications Approved/Not Accepted in MSA	Applications Denied by banks	% of Applications Denied in MSA	Applications Withdrawn by banks	% of Applications Withdrawn in MSA	Files Closed as Incomplete by banks	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	80	39%	55	38%	5	50%	14	42%	5	33%	1	20%
Black or African American	78	54%	48	58%	2	67%	23	55%	3	27%	2	33%
Nat Hawaiian/other Pac Isl	2	67%	2	67%	0	0%	0	0%	0	0%	0	0%
White	242	25%	150	24%	7	23%	57	28%	15	18%	13	36%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	17%	0	0%	0	0%	0	0%	1	100%	0	0%
Race N/A	44	32%	25	32%	1	17%	10	32%	3	21%	5	63%
Total	447	30%	280	30%	15	29%	104	34%	27	22%	21	38%

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





Ratings Summary



Summary

Note: Information in this section is summary only. Expanded information on all financial institutions is contained in the subsequent sections. (See sections 3 to 18.)

FDIC Review Schedule

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

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

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

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

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

OCC and OTS Review Schedule

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

Overall Rating

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

Bank	Rating
Bank of America	OUTSTANDING
Blue Hills Bank	SATISFACTORY
BNYMellon Bank	SATISFACTORY
Boston Private Bank	OUTSTANDING
Cathay Bank	SATISFACTORY
Century Bank	SATISFACTORY
Commonwealth Cooperative Bank	SATISFACTORY
East Boston Savings Bank	SATISFACTORY
Eastern Bank	OUTSTANDING
First Trade Union Bank	SATISFACTORY
JPMorgan Chase Bank	SATISFACTORY
OneUnited Bank	NEEDS TO IMPROVE
RBSCitizens	OUTSTANDING
Sovereign Bank	OUTSTANDING
TD Bank	OUTSTANDING
Webster Bank	OUTSTANDING

¹ See Appendix for rating definitions.



Overall and Test Ratings

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

Bank of America²

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

Boston Private Bank & Trust Company⁵

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

Blue Hills Bank³

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

Cathay Bank⁶

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

BNYMellon Bank⁴

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

Century Bank⁷

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

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

³ Based on most recent CRA Performance Evaluation By FDIC published 2012.

⁴ Based on most recent CRA Performance Evaluation published by Federal Reserve Bank of New York published 2011.

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

⁶ Based on most recent CRA Performance Evaluation by FDIC published 2012.

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



Commonwealth Cooperative Bank⁸

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

First Trade Union Bank¹¹

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

East Boston Savings Bank⁹

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

JPMorgan Chase Bank¹²

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

Eastern Bank¹⁰

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

OneUnited Bank¹³

Regulatory Body:	Federal Deposit Insurance Corporation
Area Tested	Rating
Overall:	NEEDS TO IMPROVE
Lending:	SUBSTANTIAL
Investment:	NONCOMPLIANCE
Investment:	NEEDS TO IMPROVE

⁸ Banks that are considered small to medium are only given one rating by the Federal Deposit Insurance Corporation as their review criteria differs from the larger banking institutions. Based on most recent CRA Performance Evaluation by OTS published 2008.

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

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

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

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

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



RBSCitizens Bank¹⁴

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

TD Bank¹⁶

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

Sovereign Bank (Massachusetts)¹⁵

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

Webster Bank¹⁷

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

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

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

¹⁶Based on most recent CRA Performance Evaluation by OCC published 2011.

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





Bank of America



Bank of America Overview

Bank of America, N.A.
100 North Tryon Street
Charlotte, NC 28255

Description

Bank of America, N.A. is a \$1.47 trillion full-service interstate bank that operates throughout the United States and in more than 40 countries. The bank, headquartered in Charlotte, North Carolina, is a subsidiary of Bank of America Corporation. Bank of America is a component of the Dow Jones Industrial Average.

The bank has established over 5,400 retail banking centers and 16,300 ATMs – the largest ATM network in the country. Bank of America services 53 million consumer and small business relationships, and provides services to half of U.S. households. The bank offers a wide range of products and services directly or indirectly through affiliates. Community development initiatives are a major focus of the bank, particularly in its role as developer of affordable housing.

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

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

Principal Officers

CEO

Brian T. Moynihan
100 North Tryon Street
Charlotte, NC 28255
704-386-5681

CFO

Bruce R. Thompson
100 North Tryon Street
Charlotte, NC 28255
704-386-5681

Global General Counsel and Head of Compliance and Regulatory Relations

Gary G. Lynch
100 North Tryon Street
Charlotte, NC 28255
704-386-5681

Employees

Number of Employees	174,892 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	5,478
Branches Within Boston MSA	35
Number of ATMs	16,347
Number of Free-Standing ATMs	10,869

CRA Rating

Rating Agency	OCC
Most Recent Rating	2009
Overall Rating for Boston MSA	OUTSTANDING ²
Lending Test Rating for Boston MSA	OUTSTANDING
Investment Test Rating for Boston MSA	OUTSTANDING
Service Test Rating for Boston MSA	OUTSTANDING

¹ FDIC Institution Directory.

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



Discussion

**Overall rating for Boston MSA:
OUTSTANDING³**

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

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

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

Lending Test

**Lending Test Rating for Boston MSA:
OUTSTANDING⁵**

General Responsiveness to Credit Needs

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

The bank’s lending performance was considered excellent and had a positive impact on the local communities in which the bank operates.⁶

In 2012, Bank of America originated \$75.1 billion in first mortgages nationwide, including \$15.5 billion for 96,500 low- and moderate-income customers.⁷

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

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

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

⁶ Based on most recent CRA Performance Evaluation by OCC published 2009.

⁷ Bank of America Annual Report Corporate Social Responsibility Report 2012.

Responsiveness to Low- and Moderate-Income Credit Needs

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

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

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

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

Leadership in Community Development

Loans

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

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

⁹ Ibid.

¹⁰ Ibid.



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

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

Bank of America is one of the country's most significant community development lenders. In 2009, the bank announced a 10-year, \$1.5 trillion community development lending and investing goal, the largest of its kind ever established by a U.S. financial institution. This lending is targeted at providing capital to low- and moderate-income and minority families, businesses, and nonprofits to promote neighborhood revitalization. \$1 trillion of this money is designated for affordable housing. In 2012, the bank provided \$105.5 billion in community development loans against this commitment.¹²

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

Innovative & Flexible Lending Practices

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

The bank also leverages partnerships with various non-profits and state and local organizations, such as NACA and the Massachusetts Housing Partnership, to help low-

and moderate-income applicants achieve home ownership.¹⁴

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

Investment Test

Investment Test Rating for Boston MSA:
OUTSTANDING¹⁶

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

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

The bank's Boston MSA investment volume reflects an excellent level of responsiveness to the needs of the area. Bank of America's Investment Test performance in the Boston MSA is rated Outstanding.

Community Development Investments & Grants

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

In addition, the bank, through its community development corporation (CDC), was one of the few financial institutions that acted as a direct developer of large-scale affordable multifamily

¹¹ Ibid.

¹² Bank of America Corporate Social Responsibility Report 2011.

¹³ Bank of America Corporate Social Responsibility Report 2011.

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

¹⁵ Bank of America Annual Report 2011 and 2012.

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



housing projects in low- and moderate-income urban areas.¹⁷ In 2012, the bank provided more than \$2.6 billion in community development lending, commitments that will help create 11,000 affordable housing units.¹⁸

The bank ranks among the most significant debt providers to Low Income Housing Tax Credit (LIHTC) projects, and is the single largest investor in Community Development Financial Institutions in the country. As of 2012, the bank has over \$1 billion in loans and investments in 244 Community Development Financial Institutions (CDFI) in all 50 states.¹⁹ CDFI investments were responsive to the needs of the bank's communities and were targeted to small businesses, microenterprises, affordable housing, and community facilities.²⁰

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

Leadership was also demonstrated by the bank's cash contributions through its corporate philanthropic program. The bank's Charitable Foundation gave \$200 million in cash donations in 2012. The bank has made an overall 10-year, \$2 billion charitable giving commitment.²²

In the Boston MSA, Bank of America made 328 investments totaling \$144.5 million during the assessment period.²³

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

¹⁸ Bank of America Corporate Social Responsibility Report 2012.

¹⁹ Bank of America Corporate Social Responsibility Report 2012.

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

²¹ Bank of American Corporate Social Responsibility Report 2011.

²² Bank of America Corporate Social Responsibility Report 2012.

²³ Based on most recent CRA Performance Evaluation by OCC published 2009.

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

Other investments consisted primarily of contributions to local or regional organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize low- and moderate-income geographies.²⁴

Service Test

Service Test Rating for Boston MSA:
OUTSTANDING²⁵

Bank of America's provision of retail services showed excellent responsiveness to the banking needs of geographies and individuals of different income levels.²⁶

As community needs changed due to the economic crisis, the bank responded by shifting the focus of some of its CD services to foreclosure prevention in its most stressed areas. Bank employees participated in foreclosure prevention workshops and assisted non-profits in increasing capacity for mortgage counseling.²⁷

Description of Service-Delivery Systems

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

In 2009, the bank launched a number of online financial literacy tools focused on credit

²⁴ Ibid.

²⁵ Based on most recent CRA Performance Evaluation by OCC published 2009.

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

²⁷ Ibid.



guidance and debt management.²⁸ It also introduced a “Clarity Commitment” aimed at promoting transparency in mortgage, home equity, and credit card lending.²⁹

In 2010, the bank equipped all of its ATMs with voice-enabled technology to provide access for visually-impaired customers.³⁰

Community Development Services

Bank of America provided an excellent level of community development services that were responsive to the community development needs of its communities.³¹

The bank is a leader in providing community development services in Boston. Services were provided to 23 organizations pursuing a variety of initiatives targeted at low- and moderate-income areas and individuals. These services addressed community development needs such as technical assistance for organizations providing economic development, affordable housing, community services, or activities that revitalize or stabilize lower-income geographies. The bank also provided homebuyer education services and loans to lower-income individuals through partnership with non-profit organizations.³²

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
60 State Street Boston MA 02109	✓	✓
6 Tremont Street Boston MA 02108	✓	✓
315 Washington Street Boston MA 02108	✓	✓
100 Federal Street Boston MA 02110	✓	✓
65 Franklin Street Boston MA 02110	✓	✓
125 High Street Boston MA 02110	✓	✓

260 Hanover Street Boston MA 02113	✓	✓
175 Federal Street Boston MA 02110	✓	✓
104 Canal Street Boston MA 02114	✓	✓
161 Cambridge Street Boston MA 02114	✓	✓
710 Washington Street Boston MA 02111	✓	✓
157 Stuart Street Boston MA 02116	✓	✓
210 Berkeley Street Boston MA 02116	✓	✓
557 Boylston Street Boston MA 02116	✓	✓
557 Tremont Street Boston MA 02118	✓	✓
699 Boylston Street Boston MA 02116	✓	✓
855 Boylston Street Boston MA 02116	✓	✓
460 W. Broadway Boston MA 02127	✓	✓
133 Massachusetts Avenue Boston MA 02115	✓	✓
636 East Broadway Boston MA 02127	✓	✓
285 Huntington Avenue Boston MA 02115	✓	✓
540 Commonwealth Avenue Boston MA 02215	✓	✓
1104 Massachusetts Avenue Dorchester MA 02125	✓	✓
114 Dudley Street Roxbury MA 02119	✓	✓
771 Commonwealth Avenue Boston MA 02215	✓	✓
333 Longwood Avenue Boston MA 02115	✓	✓
555 Columbia Rd. Dorchester MA 02125	✓	✓
1614 Tremont Street Boston MA 02120	✓	✓
315 Centre Street Jamaica Plain MA 02130	✓	✓
470 Blue Hill Avenue Dorchester MA 02121	✓	✓
1237 Commonwealth Avenue Boston MA 02134	✓	✓
1440 Dorchester Avenue Dorchester MA 02122	✓	✓
677 Centre Street Boston MA 02130	✓	✓
618 Washington Street Dorchester MA 02124	✓	✓
5 Chestnut Hill Avenue	✓	✓

²⁸ Bank of America Annual Report 2009.

²⁹ Bank of America website.

³⁰ Bank of America website.

³¹ Based on most recent CRA Performance Evaluation by OCC published 2009.

³² Bank of America website.



Brighton MA 02135
FSB: Full Service Branch

Other Programs

Bank of America has been responsive in helping to meet the credit needs of its communities through its mortgage loan refinancing, restructuring, and modification programs. Foreclosure assistance was provided in all areas. This assistance was considered highly responsive to the needs of the areas where the bank operates.³³

Between January 2009 and December 2009, the bank made nearly 700,000 trial mortgage modifications, more than any other institution; however, by May 2010 only 62,969 modifications had been made permanent.³⁴

In 2011, the bank made over 200,000 home mortgage modifications nationwide, or approximately one-third of all home mortgage modifications in the country.³⁵ This relative success, however, must be placed in the context of the broad failure of mortgage modification programs.³⁶

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Bank of America’s Boston HMDA applications and originations fell sharply from 2010 to 2012. 2012 HMDA applications received and lending volume are both less than 50% of 2010 levels.

As for the bank’s low-income HMDA lending, while the number of low-income applications received fell by 52% from 2010 to 2012, the number of low-income loans originated fell by only 32% during the same period.³⁷

	2010	2011	2012
HMDA Applications Received	1691	1074	758
HMDA Loans Originated	1051	673	489
Low-Income Applications Received	183	115	87
Low-Income Loans Originated	82	55	56

³³ Based on most recent CRA Performance Evaluation by OCC published 2009.

³⁴ Bank of America Annual Report 2009; Bank of America website.

³⁵ Bank of America Annual Report 2011.

³⁶ See Introduction.

³⁷ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	1.8%	2.1%	2.2%
Moderate	0.7%	1.2%	1.7%
Middle	1.6%	1.8%	1.9%
Upper	2.0%	2.2%	2.6%
Total	1.4%	1.8%	2.2%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	13.6%	8.4%	12.1%
Moderate	6.7%	5.3%	6.5%
Middle	12.0%	11.0%	7.1%
Upper	16.1%	11.2%	11.7%
Total	12.1%	9.1%	10.1%

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Bank of America in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.



Source Documents

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

Bank of America Annual Report, 2011 and 2012.

Bank of America 2012 Corporate Social Responsibility Report.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2012.

FDIC Institution Directory:
<http://www2.fdic.gov/idasp>

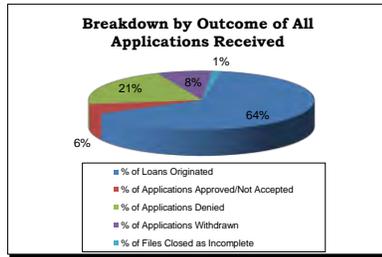
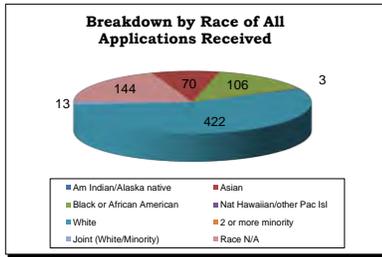
Bank of America website:
<http://www.bankofamerica.com>

Bank of America, N.A. HMDA Mortgage Lending

2012

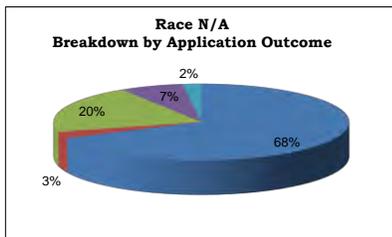
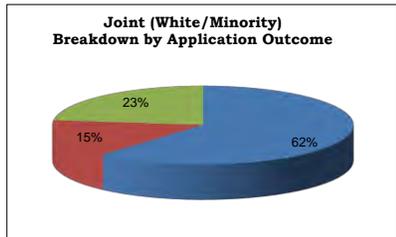
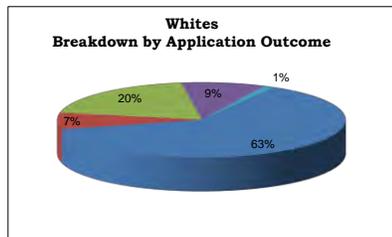
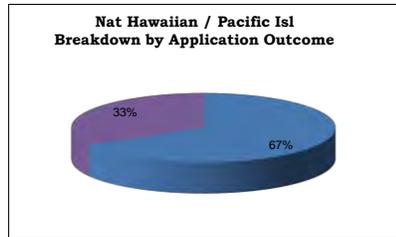
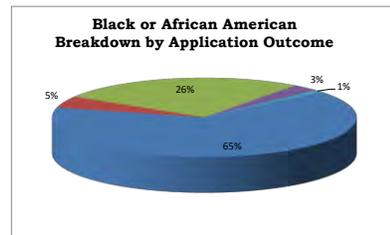
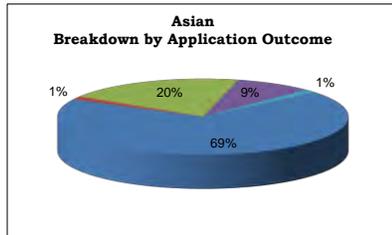
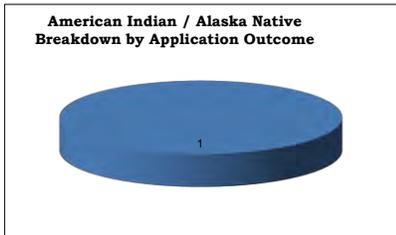
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	70	9%	48	69%	1	1%	14	20%	6	9%	1	1%
Black or African American	106	14%	69	65%	5	5%	28	26%	3	3%	1	1%
Nat Hawaiian/other Pac Isl	3	0%	2	67%	0	0%	0	0%	1	33%	0	0%
White	422	56%	264	63%	30	7%	83	20%	40	9%	5	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	13	2%	8	62%	2	15%	3	23%	0	0%	0	0%
Race N/A	144	19%	98	68%	4	3%	29	20%	10	7%	3	2%
Total	758	100%	489	65%	42	6%	157	21%	60	8%	10	1%

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



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

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



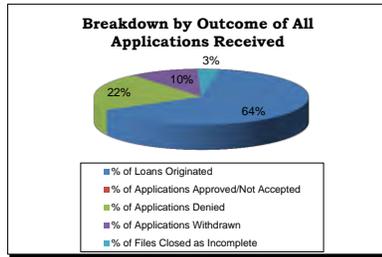
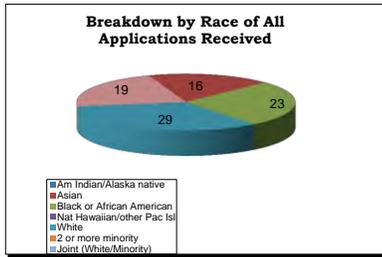
- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

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

2012

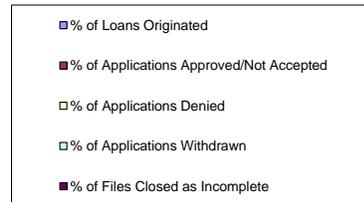
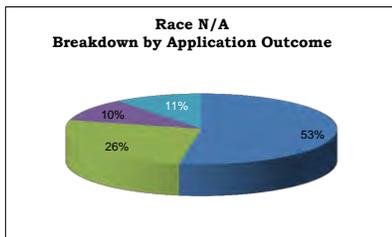
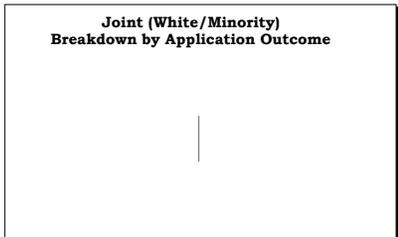
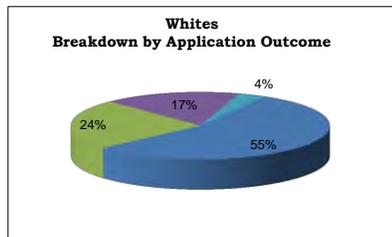
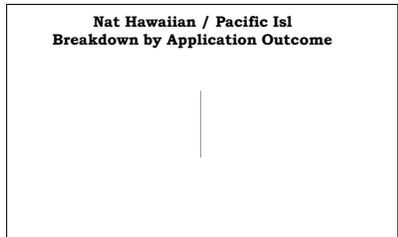
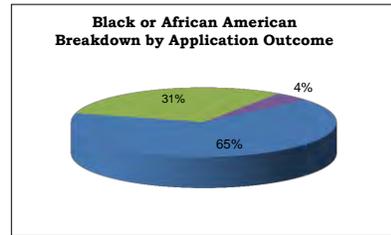
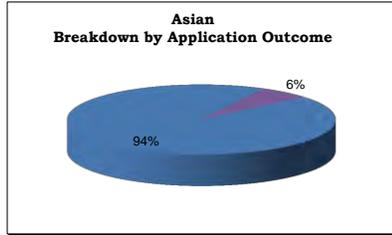
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	16	18%	15	94%	0	0%	0	0%	1	6%	0	0%
Black or African American	23	26%	15	65%	0	0%	7	30%	1	4%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	29	33%	16	55%	0	0%	7	24%	5	17%	1	3%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	19	22%	10	53%	0	0%	5	26%	2	11%	2	11%
Total	87	100%	56	64%	0	0%	19	22%	9	10%	3	3%

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



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

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



Compared against the MSA Aggregate Total

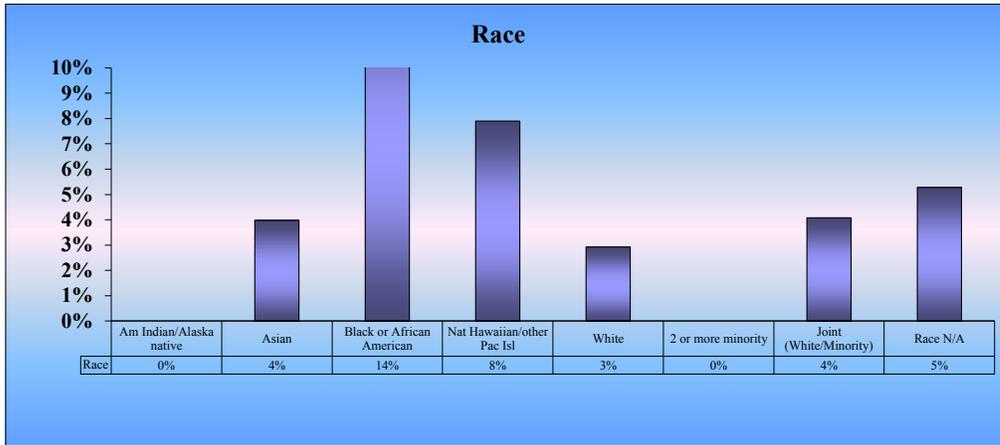
2012

Bank of America HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	70	4%	48	4%	1	1%	14	7%	6	4%	1	2%
Black or African American	106	14%	69	15%	5	20%	28	16%	3	5%	1	3%
Nat Hawaiian/other Pac Isl	3	8%	2	8%	0	0%	0	0%	1	20%	0	0%
White	422	3%	264	2%	30	7%	83	6%	40	3%	5	2%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	13	4%	8	3%	2	18%	3	17%	0	0%	0	0%
Race N/A	144	5%	98	5%	4	4%	29	13%	10	3%	3	4%
Total	758	4%	489	3%	42	6%	157	8%	60	3%	10	2%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.

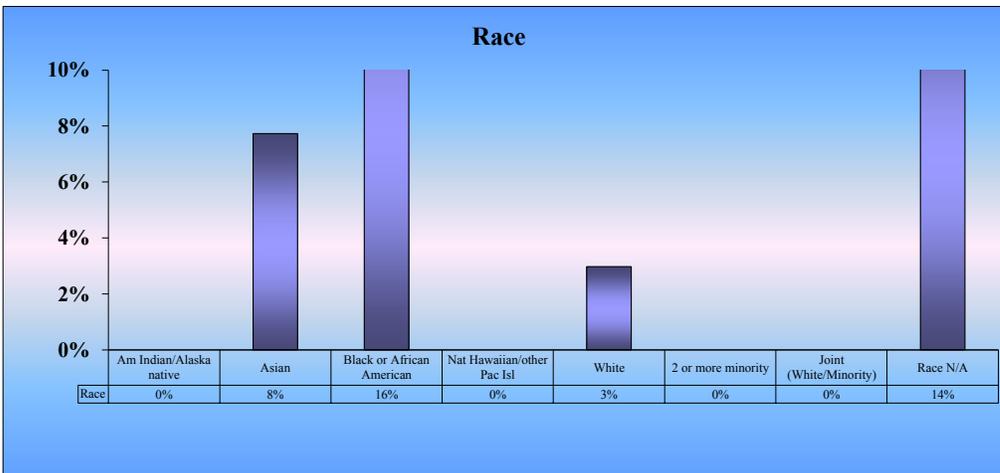


Bank of America Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	16	8%	15	10%	0	0%	0	0%	1	7%	0	0%
Black or African American	23	16%	15	18%	0	0%	7	17%	1	9%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	29	3%	16	3%	0	0%	7	3%	5	6%	1	3%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	19	14%	10	13%	0	0%	5	16%	2	14%	2	25%
Total	87	6%	56	6%	0	0%	19	6%	9	7%	3	5%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Blue Hills Bank



Blue Hills Bank Overview

Blue Hills Bank
1196 River Street
Boston, MA 02136

Description

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

The bank’s assets total \$1.2 billion. In late 2010, the bank announced a new business model focused on expanding its product lines, with the goal of becoming a fully diversified community bank. In 2011, the bank created a new commercial banking division.

Following these changes, the bank’s residential lending levels have significantly increased and shifted in composition. From 2010 to 2012, the bank’s level of lending for one-to-four family residential properties increased from \$195 million to \$338 million. In 2012, loans secured by one-to-four family residential properties made up 48.1% of all loans.

Principal Officers

CEO & President

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

CFO

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

Chief Risk Officer

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

Employees

Number of Employees	141 ¹
Number of Employees in Massachusetts	141
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

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

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2012
Overall Rating	SATISFACTORY ²
Lending Test Rating	SATISFACTORY
Investment Test Rating	OUTSTANDING
Service Test Rating	OUTSTANDING

¹ FDIC Institution Directory

² Based on most recent CRA Performance Evaluation by FDIC published 2012.



Discussion

Overall rating: SATISFACTORY³

Lending Test

Lending Test Rating: SATISFACTORY⁴

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

General Responsiveness to Credit Needs

Blue Hills Bank’s overall lending volume reflects adequate responsiveness to assessment-area credit needs.⁵

Although the bank’s management has made a concerted effort to increase the bank’s lending volume and loan-to-deposit ratio, the bank’s lending volume still lags far behind that of comparable institutions. Blue Hills Bank’s loan-to-deposit ratio increased from 26.8% in 2009 to 59.7% at year-end 2012; however, comparable area institutions typically maintain a loan-to-deposit ratio of 80 to 90 percent.

Bank management has publicly recognized this discrepancy and has implemented strategic plans to remedy it in coming years.⁶ As a result of this new strategic focus, the bank’s direct residential mortgage originations grew 79% year-over-year between 2011 and 2012, and overall residential originations grew 24% year-over-year.⁷

Responsiveness to Low- and Moderate-Income Credit Needs

The distribution of Blue Hills Bank’s home mortgage lending displays an excellent responsiveness to the needs of low- and moderate-income borrowers.⁸

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

performance of 1.5 percent. The bank’s lending in moderate-income census tracts (12.8%) exceeds both the percent of owner-occupied properties in moderate-income geographies (12.4%) and the aggregate lending level (8.1%).

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

The proportion of home mortgage loans originated by the bank to low-income borrowers increased substantially during 2011, particularly in the home purchase category. In 2011, the bank originated 13.6% of total home purchase loans to low-income borrowers, far exceeding the 8.6% proportion of low-income families in the local population.⁹

Leadership in Community Development Loans

Blue Hills Bank has made an adequate level of community development loans.¹⁰

The bank is not heavily engaged in commercial lending, and makes few multi-family loans. Thus, its opportunities for community development lending are limited.¹¹ However, the Bank has identified two loan funds and an initiative to protect seniors as viable ways to extend credit to support community development projects. These are:

- A \$2 million investment in the Boston Community Loan Fund, which is administered by a certified Community Development Financial Institution (CDFI).
- A \$500,000 commitment to the Solomon Hess SBA Loan Fund, which promotes job creation by investing in the federally guaranteed portion of SBA 7(a) loans.
- Since 2008, an annually renewed \$1 million loan to the Senior Housing Crime Prevention

³ Based on most recent CRA Performance Evaluation by FDIC published 2012.

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

⁵ Ibid.

⁶ Blue Hills Bank Annual Report 2012; based on most recent CRA Performance Evaluation by FDIC published 2012.

⁷ Blue Hills Bank Annual Report 2012.

⁸ Based on most recent CRA Performance Evaluation by FDIC published 2012.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.



Foundation, which seeks to provide safe and secure living environments for senior citizens.

Innovative or Flexible Lending Practices

Blue Hills Bank makes use of innovative and flexible credit programs to help meet the needs of low-and moderate-income geographies and borrowers.¹²

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

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

In 2012, the bank received the MassHousing Partnership HomeSafe Award for outstanding work assisting first-time homebuyers.¹³

Investment Test

Investment Test Rating:
OUTSTANDING¹⁴

Blue Hills Bank made an excellent level of qualified community development investments and grants. Qualified investments for the evaluation period totaled \$10.6 million. Total

bonds and equity securities and equity investments totaled \$10.3 million, and qualified CRA contributions totaled \$245 thousand.¹⁵

The bank’s largest community development investments are:

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

Charitable Contributions

Blue Hills Bank’s qualified charitable contributions totaled \$245,000 during the review period of June 2009 through May 2012.¹⁶

The bank established the Blue Hills Bank Charitable Foundation in November 2011, formalizing its community development efforts. The bank donates 5% of pre-tax profits to the foundation. In 2012, the foundation provided over \$500,000 in donations to area not-for-profits and in funding for the bank’s financial literacy programs.¹⁷

Boston-based organizations that received major gifts from the Blue Hills Bank Charitable Foundation in 2012 include:

- Greater Boston YMCA
- Hyde Park YMCA
- Hyde Park Main Streets
- Rebuilding Together Boston
- West Roxbury YMCA
- Hyde Park Arts Association/Menino Art Center

Service Test

Service Test Rating:
OUTSTANDING¹⁸

Description of Service-Delivery Systems

Blue Hills Bank’s delivery systems are accessible to essentially all portions of the assessment area. The bank’s retail services, including business hours, are tailored to the

¹² Ibid.

¹³ Blue Hills Bank Annual Report 2012.

¹⁴ Based on most recent CRA Performance Evaluation by FDIC published 2012.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Blue Hills Bank website.

¹⁸ Based on most recent CRA Performance Evaluation by FDIC published 2012.



convenience and needs of the assessment area, particularly low- and moderate-income geographies and individuals.¹⁹

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

The bank also offers online and telephone banking, and a full range of banking solutions for small businesses. In 2012, the bank expanded its online banking platform to better serve its customers.²⁰

Community Development Services

Blue Hills Bank is a leader in providing community development services. These services have resulted in a better-educated community, increased awareness of community needs, and contributed to improving the communities served. The bank directs its community development services toward low- and moderate-income residents.²¹

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

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

Bank officers and employees have participated in educational seminars and other bank-sponsored events. During the examination period, Blue Hills Bank held six first-time homebuyer seminars. Topics included: getting ready for home ownership; pre-qualification; pre-approval; advantages of home ownership; and required documentation.²²

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

management principles through an interactive musical. In 2012, these programs reached over 11,000 area students.²³

In 2011, the bank began participating in the Interest on Lawyers’ Trust Accounts (IOLTA), which uses interest on the trust accounts to fund delivery of legal services to low-income clients. Blue Hills Bank contributed \$14,321 in interest for the period January 2011 to May 2012. Because the Bank goes above and beyond by paying an interest rate of at least 1.0 percent, it has been named a Leadership Institution by the IOLTA Committee.²⁴

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

Blue Hills Bank collaborates with Ecumenical Social Action Committee (ESAC) of Jamaica Plain in its Sustainable Homeownership Program. The goal of the program is to prevent needless home foreclosures. Homeowners on the verge of foreclosure are counseled by ESAC and referred to participating lenders such as the Blue Hills Bank.²⁵

Branch Information

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Blue Hills Bank’s HMDA lending rose steadily year over year between 2010 and 2012. However, low-income HMDA lending levels remain low. After a five-fold increase in low-income HMDA loan originations from 2010 to

¹⁹ Ibid.

²⁰ Blue Hills Bank Annual Report 2012.

²¹ Based on most recent CRA Performance Evaluation by FDIC published 2012.

²² Ibid.

²³ Blue Hills Bank Annual Report 2012.

²⁴ Based on most recent CRA Performance Evaluation by FDIC published 2012.

²⁵ Ibid.



2011, the bank's low-income HDMA loan origination level dropped back to just 3 loans in 2012.²⁶

	2010	2011	2012
HMDA Applications Received	57	82	94
HMDA Loans Originated	38	51	60
Low-Income Applications Received	2	15	7
Low-Income Loans Originated	2	10	3

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

Loan Information By Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	NA	NA	0.0%
Moderate	NA	NA	0.0%
Middle	NA	NA	0.0%
Upper	NA	NA	0.0%
Total	NA	NA	0.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	NA	NA	0.0%
Moderate	NA	NA	0.0%
Middle	NA	NA	0.0%
Upper	NA	NA	0.1%
Total	NA	NA	0.0%

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Blue Hills Bank in the year 2012 is also compared to the 2012

²⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

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

Blue Hills Bank Annual Report 2012.

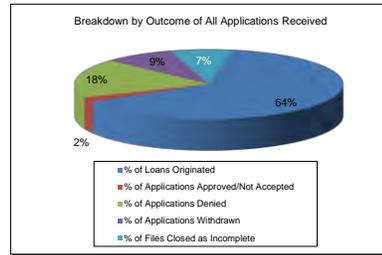
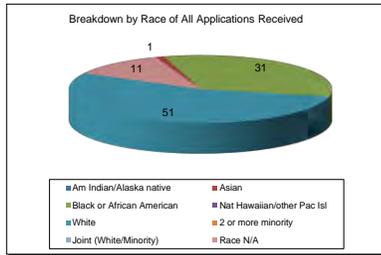
Blue Hills Bank website:
<http://www.bluehillsbank.com/>

Blue Hills Savings Bank HMDA Mortgage Information

2012

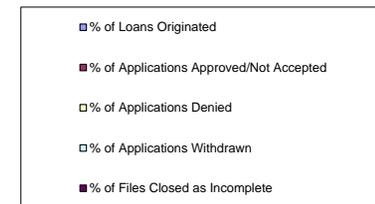
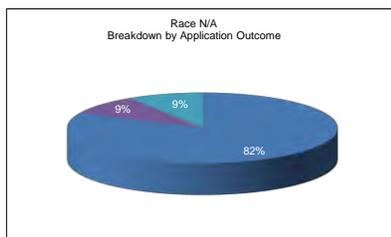
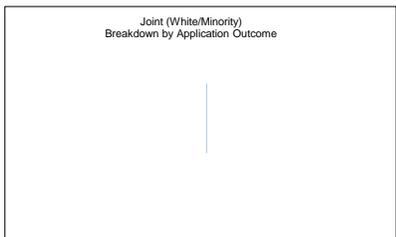
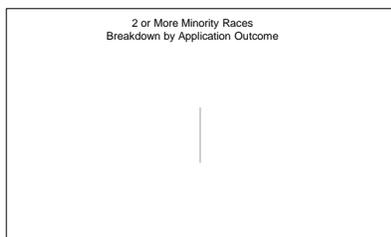
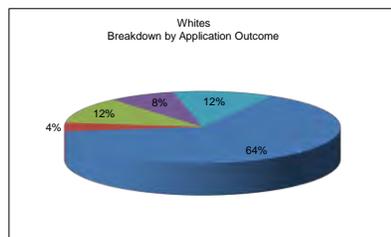
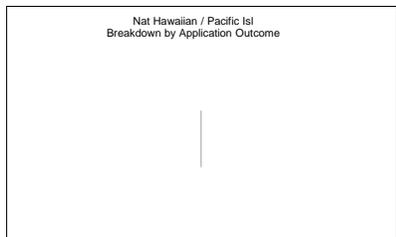
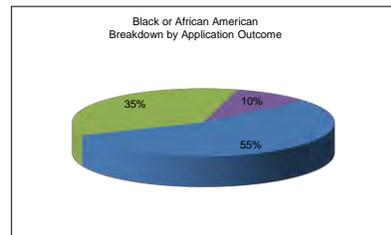
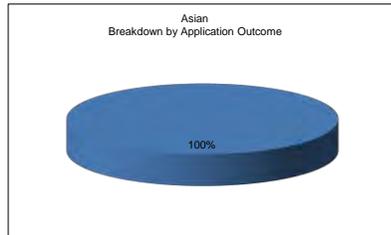
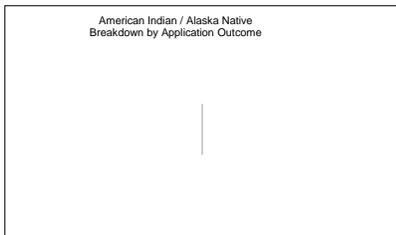
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	1%	1	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	31	33%	17	55%	0	0%	11	35%	3	10%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	51	54%	33	65%	2	4%	6	12%	4	8%	6	12%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	11	12%	9	82%	0	0%	0	0%	1	9%	1	9%
Total	94	100%	60	64%	2	2%	17	18%	8	9%	7	7%

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



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

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

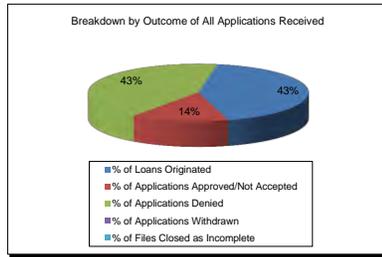
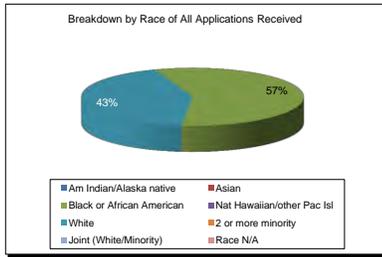


Blue Hills Bank Low-Income Mortgage Information

2012

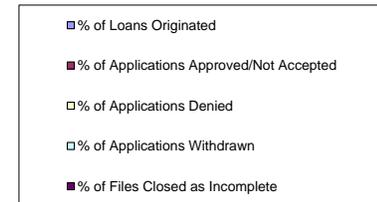
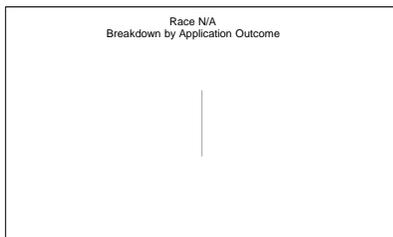
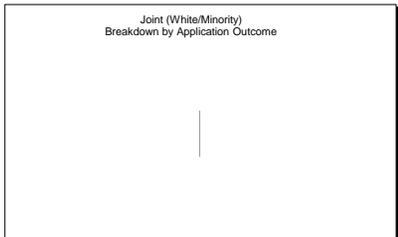
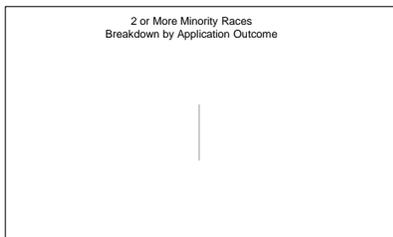
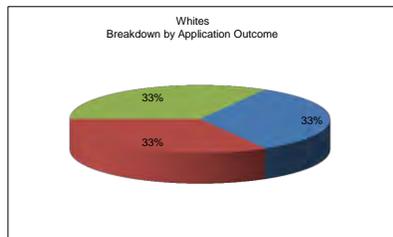
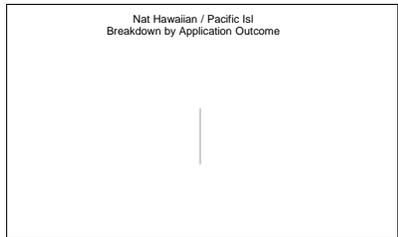
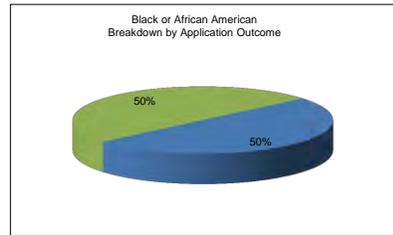
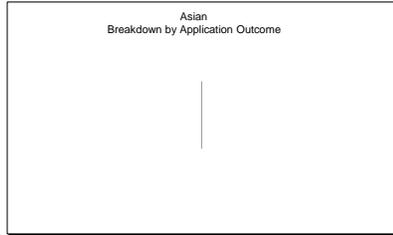
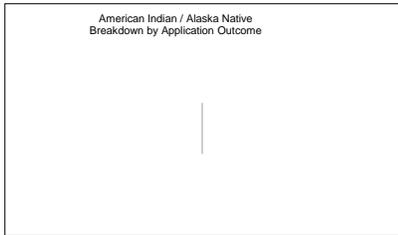
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	4	57%	2	50%	0	0%	2	50%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	3	43%	1	33%	1	33%	1	33%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	7	100%	3	43%	1	14%	3	43%	0	0%	0	0%

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



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

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



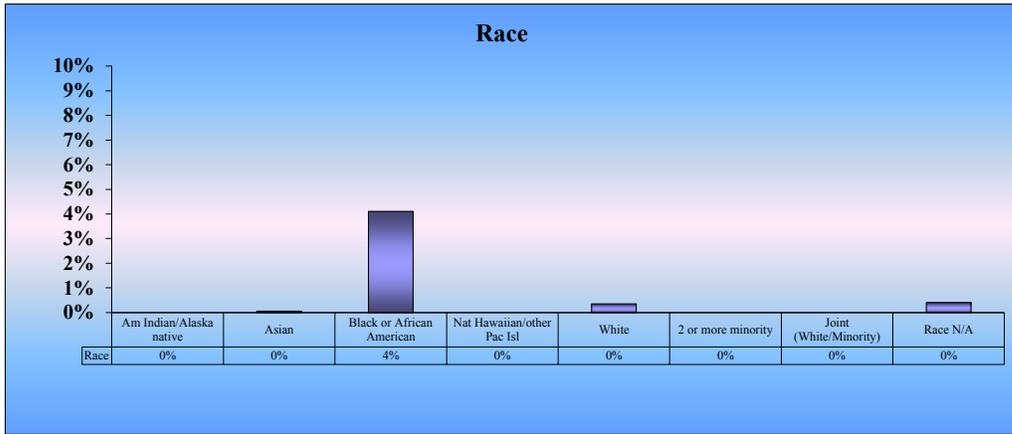
Compared against the MSA Aggregate Total

2012

Blue Hills Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	0%	1	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	31	4%	17	4%	0	0%	11	6%	3	5%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	51	0%	33	0%	2	0%	6	0%	4	0%	6	2%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	11	0%	9	0%	0	0%	0	0%	1	0%	1	1%
Total	94	0%	60	0%	2	0%	17	1%	8	0%	7	1%

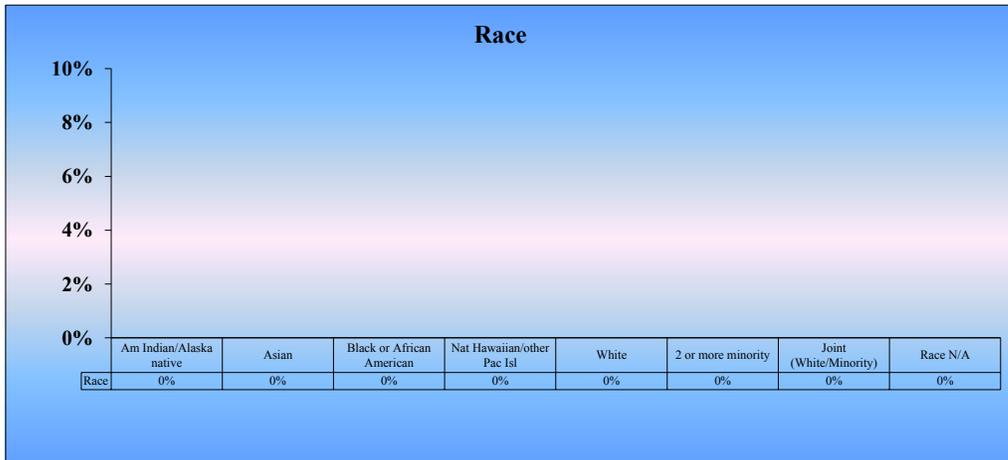
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Blue Hills Bank Low-Income Mortgage Information

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

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.





BNYMellon Bank



THE BANK OF NEW YORK MELLON

BNYMellon Bank Overview

BNYMellon Bank
One Wall Street
New York, NY 10286

Description

BNYMellon Bank, headquartered in New York, is a state-chartered wholesale banking institution providing asset servicing, custody services, U.S. dollar clearing, and treasury operations. The bank is one of three banking subsidiaries of The BNYMellon Bank Financial Corporation, a global asset management and securities servicing company. As of 2012, BNYMellon has total assets of \$282 billion, with domestic deposits of \$129 billion and net loans and leases of nearly \$28 billion.

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

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

Principal Officers

Chairman and CEO

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

CFO

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

Chief Risk Officer

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

Employees

Number of Employees	33,742 ⁹³
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

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

CRA Rating

Rating Agency	Federal Reserve Bank of New York
Most Recent Rating	2011
Overall Rating	SATISFACTORY ⁹⁴

⁹³ FDIC Institution Directory.

⁹⁴ Based on most recent CRA Performance Evaluation by Federal Reserve Bank of New York published 2011.



Discussion

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

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

Overall Rating: SATISFACTORY⁹⁵

BNY Mellon provided an adequate level of community development loans, and extensive use of qualified investments. The bank’s community development activities exhibit adequate responsiveness to the assessment area’s credit and community economic development needs, focusing on affordable housing.⁹⁶

Community Development Activities

BNY Mellon made a total of \$1.2 billion in community development lending and qualified investments during the current examination period (2009-2011). The bank’s community development lending was almost entirely focused on affordable housing (\$1.1 billion out of \$1.2 billion).⁹⁷

The bank’s overall level of community development loans and investments, as a percentage of average assets, was below the average of its peers.⁹⁸

Community Development Lending

Community development lending during the current evaluation period totaled \$543 million. This represents a 24% decline from the prior evaluation period.⁹⁹

Level and Nature of Qualified Investments

During the examination period, qualified investments totaled \$635 million, representing a significant increase from the last evaluation period's total of \$365 million. BNY Mellon’s current level of community development investments increased by 39% compared to the prior evaluation.¹⁰⁰

BNYM's qualified investments were primarily targeted (99% by dollar amount) toward the development of affordable housing through investments in mortgage-backed securities and Low-Income Housing Tax Credits (LIHTCs). LIHTCs were highly responsive to this critical community development need.¹⁰¹

Community Development Services

During the examination period, BNY Mellon provided 179 community development services. Community development services provided by BNY Mellon were adequately responsive to community development needs. Services consisted primarily of ongoing participation on boards of local community development organizations.¹⁰²

In 2012, the bank’s total Massachusetts philanthropic cash giving totaled \$3.3 million.¹⁰³

Branch Information

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

⁹⁵ Based on most recent CRA Performance Evaluation by Federal Reserve Bank of New York published 2011.

⁹⁶ Ibid.

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ Ibid.

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

¹⁰² Ibid.

¹⁰³ BNY Mellon Corporate Social Responsibility Report 2012.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

In 2011, BNY Mellon completed its exit from the consumer lending market and neither accepted applications nor made any HMDA loans. In 2010, BNY Mellon originated 22 HMDA-reportable loans in the Boston MSA, and no low-income loans.¹⁰⁴

	2010	2011	2012
HMDA Applications Received	27	0	0
HMDA Loans Originated	22	0	0
Low-Income Applications Received	0	0	0
Low-Income Loans Originated	0	0	0

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	0.1%	0.2%	0.0%
Moderate	0.1%	0.0%	0.1%
Middle	0.0%	0.0%	0.0%
Upper	0.1%	0.2%	0.1%
Total	0.1%	0.1%	0.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	2.1%	1.1%	0.0%
Moderate	1.4%	0.9%	0.1%
Middle	0.0%	0.0%	0.0%
Upper	1.4%	0.3%	0.6%
Total	1.2%	0.6%	0.3%

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for BNY Mellon in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

¹⁰⁴ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

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

BNY Mellon Corporation Annual Report 2011 and 2012.

BNY Mellon Corporate Social Responsibility Report, 2012.

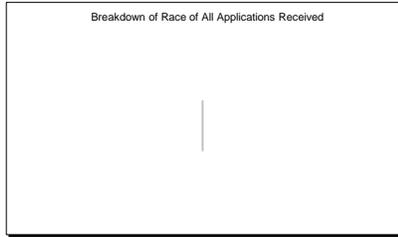
BNY Mellon website:
<http://www.bnymellon.com/>

Bank of NY Mellon HMDA Mortgage Information

2012

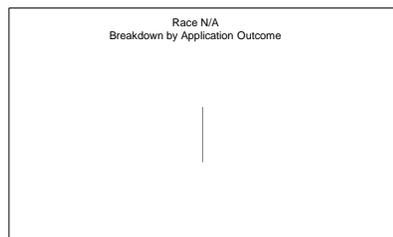
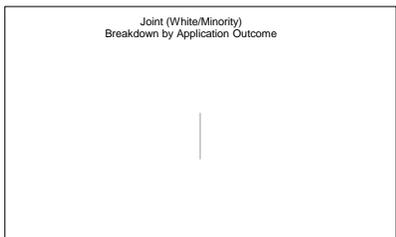
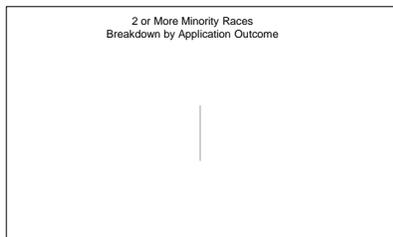
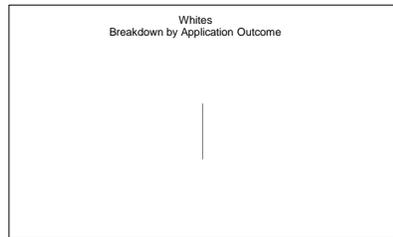
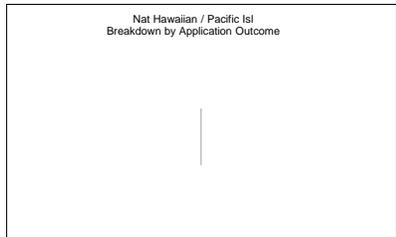
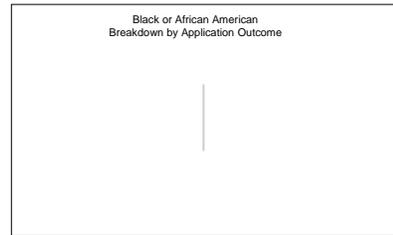
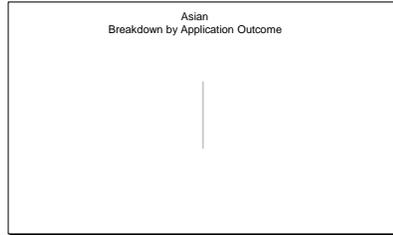
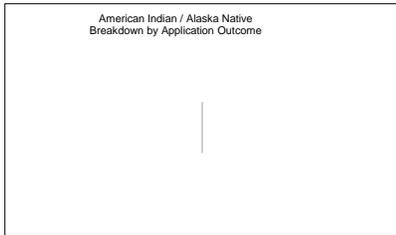
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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



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

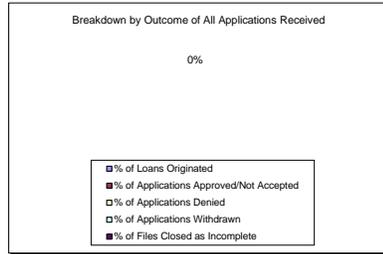
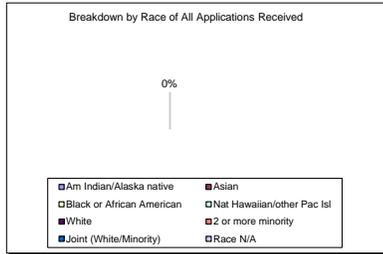
Bank of NY Mellon Low-Income Mortgage Information

Note: No Data Reported for the Boston/Quincy Region

2012

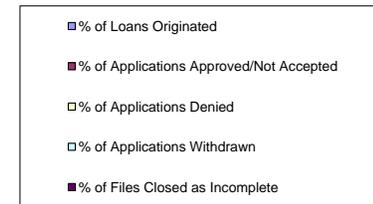
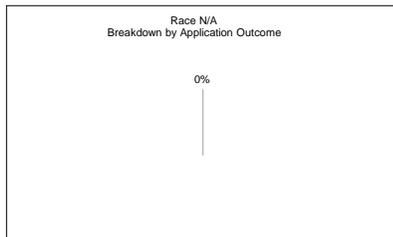
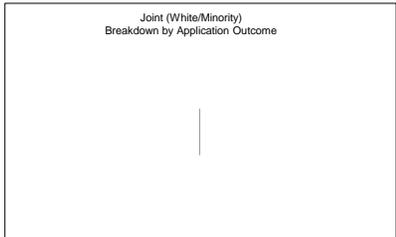
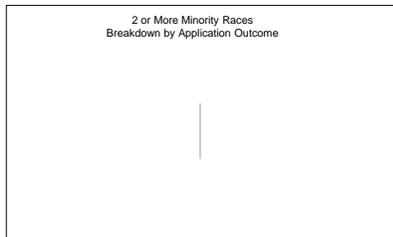
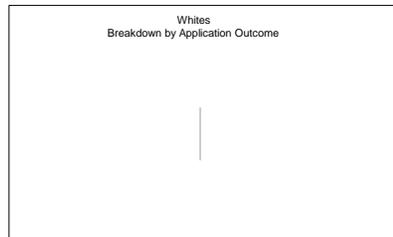
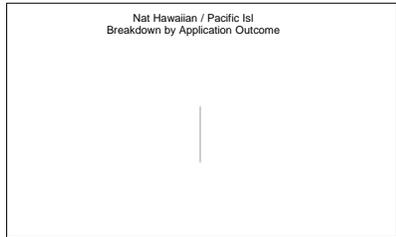
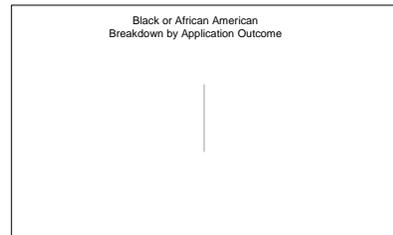
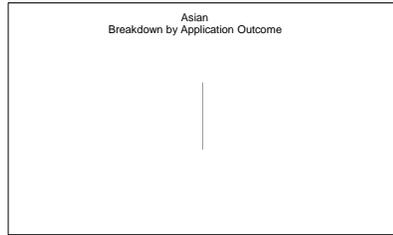
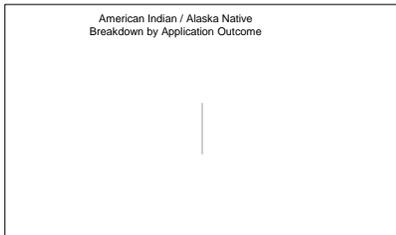
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White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%

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Boston Private Bank



**BOSTON PRIVATE BANK
& TRUST COMPANY**

Boston Private Bank Overview

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

Chief Risk Officer

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

Description

Boston Private Bank & Trust Company is a \$6.27 billion stock-owned commercial bank headquartered in Boston. The bank is a subsidiary of Boston Private Financial Holdings.

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

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

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

Nearly half (44%) of the bank’s total loans and leases are 1-4 family residential mortgage loans. The bank has announced its strategic decision to increase the proportion of residential mortgage loans in its lending portfolio relative to its commercial real estate loans, which currently make up 36% of the bank’s loan portfolio.

Principal Officers

CEO & President

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

Chief Financial and Administrative Officer

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

Employees

Number of Employees	637 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

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

CRA Rating

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

¹ FDIC Institution Directory

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



Discussion

Overall rating: OUTSTANDING³

Boston Private Bank was evaluated using the large bank CRA examination procedures. The assigned rating is based on the results of three performance tests: the Lending, Investment, and Service Tests.

Lending Test

Lending Test Rating: OUTSTANDING⁴

General Responsiveness to Credit Needs

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

Responsiveness to Low- and Moderate-Income Credit Needs

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

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

Boston Private Bank consistently exceeds the aggregate in home purchase lending to low- and moderate-income geographies, and the bank's

lending in these geographies compares favorably to area demographics.⁸

Though the bank's Boston-area HMDA-reportable lending decreased between 2009 and 2011, the bank's performance was still considered strong considering the extent of the economic deterioration that occurred during this period.⁹

Leadership in Community-Development

Loans

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

During the evaluation period of 2009-2011, the bank originated 93 community development loans, totaling \$229.4 million. Given the needs of the assessment area and the weakened economy, the bank's community development lending performance is considered excellent.¹⁰

Innovative & Flexible Lending Practices

Boston Private Bank makes extensive use of innovative and flexible lending programs in order to serve its assessment-area credit needs. Several loan programs it offers are specifically tailored to assist low- and moderate-income individuals in attaining homeownership by offering below-market interest rates, reduced costs and flexible underwriting guidelines.¹¹

Several factors contribute to the bank's success in originating loans to borrowers of low- and moderate-income. First, the bank is effectively using Soft Second mortgage loan programs to assist applicants in obtaining homeownership. Boston Private Bank has consistently been the number-one Soft Second mortgage lender in Boston, and is among the top five lenders in Massachusetts overall.

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

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

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

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

⁹ Based on most recent CRA Performance Evaluation by FDIC published 2011; and FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System, 2011.

¹⁰ Ibid.

¹¹ Ibid.



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

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

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

Boston Private Bank works with the City of Boston Department of Neighborhood Development on its Foreclosure Prevention Initiative, and on its 3D Program, which helps finance homebuyers who meet certain income guidelines.¹²

Boston Private Bank was designated in 2006 as a “First Choice Lender” by Mayor Thomas Menino. The bank provides mortgage financing using flexible underwriting criteria and works with Boston’s Home Center and nonprofit homeowner counseling agencies to help victims of predatory lending. The bank has originated few loans under this program due to current market conditions and the limited number of qualified applicants.¹³

Investment Test

Investment Test Rating: OUTSTANDING¹⁴

¹² Based on most recent CRA Performance Evaluation by FDIC published 2011; Boston Private Bank website.

¹³ Ibid.

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

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

During the examination period, the bank demonstrated an excellent level of investments in affordable housing programs, economic development programs, and organizations that meet a range of community development needs, particularly for low- or moderate-income residents.¹⁵

Community Development Investments & Grants

Boston Private Bank’s new qualified investments totaled approximately \$230 million for the examination period 2009-2011. This total includes new equity investments in affordable housing, small businesses, and community development grants. Retained investments from prior commitments totaled almost \$22 million.¹⁶

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

During the examination period, Boston Private Bank made \$227 million in Ginnie Mae Bond purchases. This investment provides capital to the national housing market to finance affordable housing for low- and moderate-income households.¹⁷

The bank also purchased over \$800,000 of Massachusetts Historic Rehabilitation Tax Credits to support the Jamaica Plain Neighborhood Development Corporation and the Neighborhood Of Affordable Housing, a

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ Ibid.



residence for formerly homeless men in East Boston.

Boston Private Bank has provided grants to various organizations that provide community services as defined by the regulation or have instituted programs targeting low- or moderate-income persons or geographies. Such qualifying services include community-based childcare, healthcare, education, and social services. During the review period, Boston Private Bank provided \$1.2 million in qualified grants and donations to numerous organizations.¹⁸

Service Test

Service Test Rating: OUTSTANDING¹⁹

Description of Service-Delivery Systems

Boston Private Bank's delivery systems are accessible to essentially all portions of the assessment area. The bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems. Services and hours of operations are tailored to meet the needs of the assessment area.²⁰

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

Community Development Services

Boston Private Bank is considered a leader in community development services. Officers and employees of the bank have provided a high level of service activity in response to community needs. Retail banking services and products offer consumers flexibility and convenience.

In addition, officers and employees of the bank provide an excellent level of involvement in community organizations located throughout its assessment area. Bank personnel serve as directors, officers, treasurers, committee members, and volunteers, and provide many services such as fundraising, public relations, finance, and administrative support. In many

cases, employee involvement in these organizations has led to loans and grants.²¹

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

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

The bank's loan officers regularly collaborate with non-profit agencies in providing first-time homebuyer counseling classes. Classes are available in English and Spanish, and translations into Chinese are also offered. Between 2008 and the first quarter 2011, loan officers from the bank taught 109 seminars to over 3,000 people, and partnered with 26 organizations.²²

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

Boston Private Bank also supports the work of the Earned Income Tax Credit Coalition of the City of Boston. It conducts a Social Investing Series as a means to increase its involvement in the community, and it administers a Community Partner Outreach program as a means to obtain a more in-depth understanding of the community development and credit needs of the local area.²³

¹⁸ Ibid.

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

²⁰ Ibid.

²¹ Ibid.

²² Ibid.

²³ Ibid.



Branch Information

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Boston Private Bank’s HMDA lending, both in terms of applications received and in loans originated, remained roughly steady from 2010 to 2012.

The bank’s low-income HMDA lending decreased during this same period, as the number of originations decreased by 34%. However, the bank consistently originates a high percentage of all low-income applications received.²⁴

	2010	2011	2012
HMDA Applications Received	356	304	341
HMDA Loans Originated	278	252	282
Low-Income Applications Received	45	27	27
Low-Income Loans Originated	35	26	23

Small Business Loans

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

Bank Compared to MSA Aggregate
Distribution of the Number of Small Business Loans

	2010	2011	2012
Low	1.0%	1.7%	0.3%
Moderate	0.4%	0.3%	0.3%
Middle	0.6%	0.6%	0.2%
Upper	2.2%	2.6%	2.3%
Total	1.0%	1.2%	1.2%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	6.3%	10.0%	1.8%
Moderate	3.6%	4.3%	2.9%
Middle	4.9%	5.0%	4.8%
Upper	14.7%	16.3%	16.6%
Total	7.5%	9.3%	10.1%

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Boston Private Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

²⁴ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

2011 Linked Deposit Banking Report to the Mayor of the City of Boston, BankIQ; March 2013.

FDIC Institution Directory

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

Boston Private Bank & Trust Company Annual Report 2012.

Boston Private Bank website:

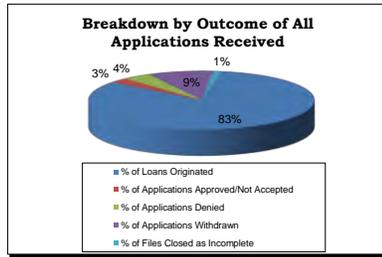
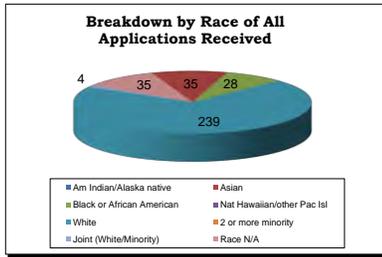
<http://www.bostonprivatebank.com/>

Boston Private Bank HMDA Mortgage Lending

2012

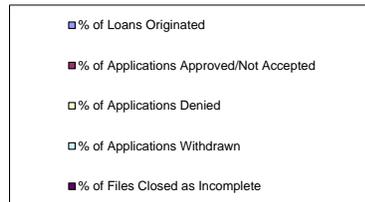
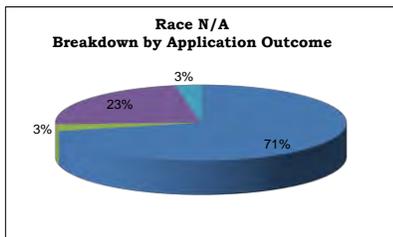
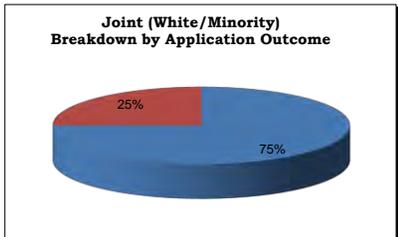
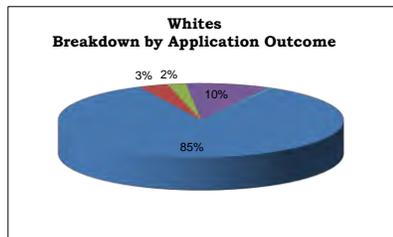
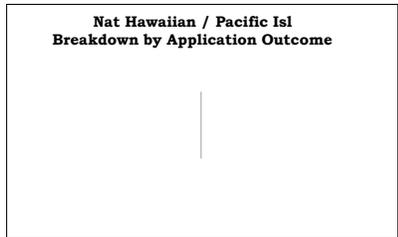
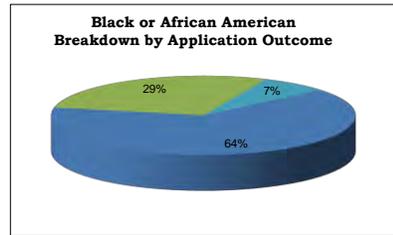
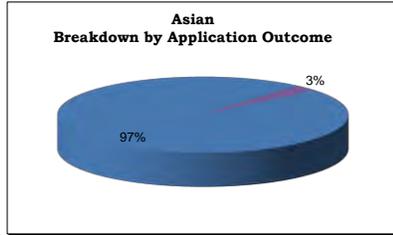
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	35	10%	34	97%	0	0%	0	0%	1	3%	0	0%
Black or African American	28	8%	18	64%	0	0%	8	29%	0	0%	2	7%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	239	70%	202	85%	8	3%	5	2%	23	10%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	1%	3	75%	1	25%	0	0%	0	0%	0	0%
Race N/A	35	10%	25	71%	0	0%	1	3%	8	23%	1	3%
Total	341	100%	282	83%	9	3%	14	4%	32	9%	4	1%

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



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

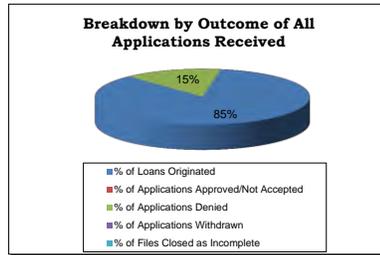
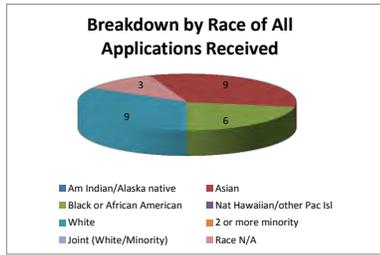
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Boston Private Bank Low-Income Mortgage Lending 2012

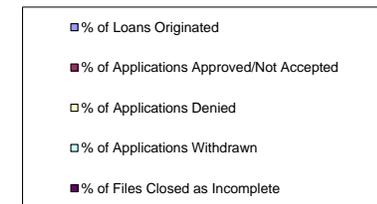
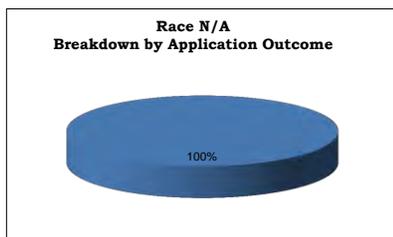
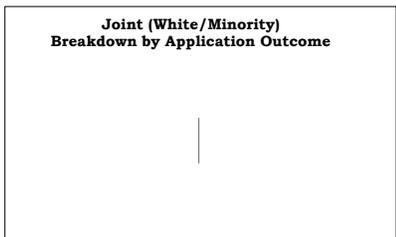
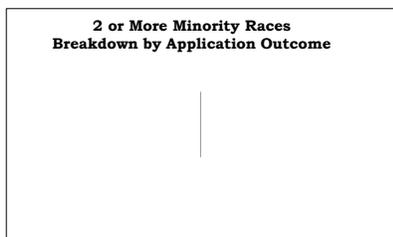
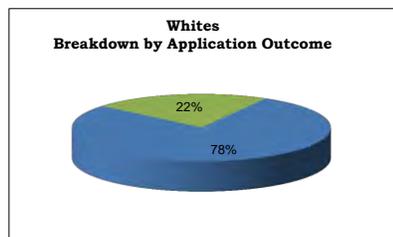
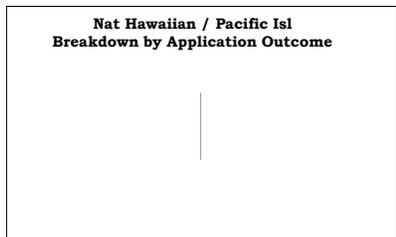
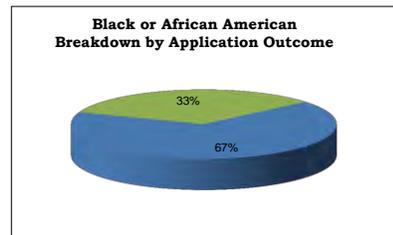
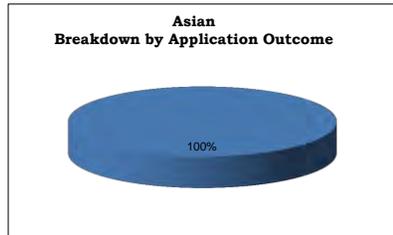
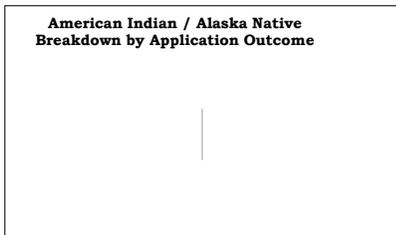
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	9	33%	9	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	6	22%	4	67%	0	0%	2	33%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	9	33%	7	78%	0	0%	2	22%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	3	11%	3	100%	0	0%	0	0%	0	0%	0	0%
Total	27	100%	23	85%	0	0%	4	15%	0	0%	0	0%

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



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

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



Compared against the MSA Aggregate Total

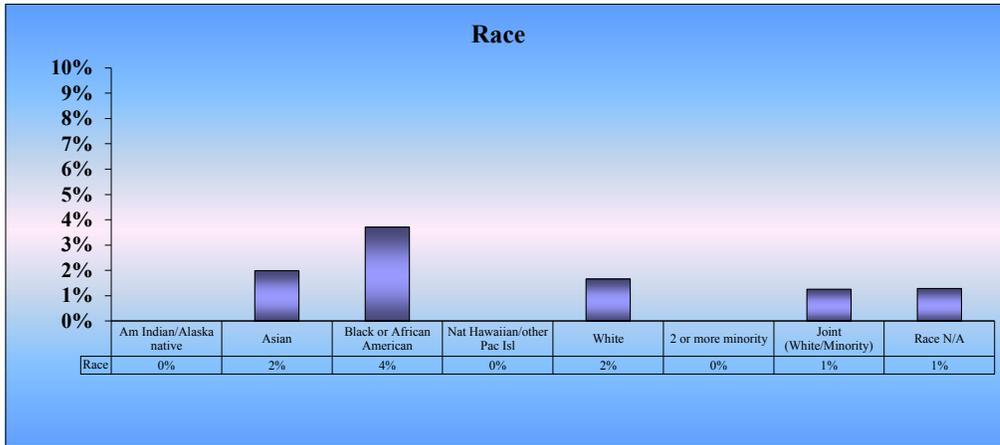
2012

Boston Private Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	35	2%	34	3%	0	0%	0	0%	1	1%	0	0%
Black or African American	28	4%	18	4%	0	0%	8	4%	0	0%	2	7%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	239	2%	202	2%	8	2%	5	0%	23	2%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	1%	3	1%	1	9%	0	0%	0	0%	0	0%
Race N/A	35	1%	25	1%	0	0%	1	0%	8	3%	1	1%
Total	341	2%	282	2%	9	1%	14	1%	32	2%	4	1%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.

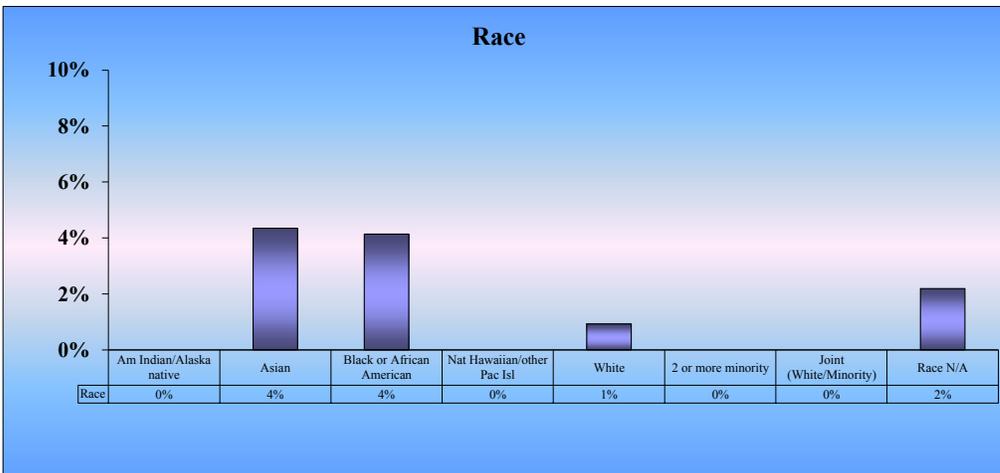


Boston Private Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	9	4%	9	6%	0	0%	0	0%	0	0%	0	0%
Black or African American	6	4%	4	5%	0	0%	2	5%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	9	1%	7	1%	0	0%	2	1%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	3	2%	3	4%	0	0%	0	0%	0	0%	0	0%
Total	27	2%	23	2%	0	0%	4	1%	0	0%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.





Cathay Bank



CATHAY BANK

Cathay Bank Overview

Cathay Bank
777 North Broadway Street
Los Angeles, California 90012

Description

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

Cathay Bank primarily operates in California markets with a concentration of Chinese-American individuals and businesses; however, the bank operates a total of 50 branch offices in seven states, including one branch in Massachusetts. The bank also operates one branch in Hong Kong, and offices in Taipei and Shanghai.

Cathay Bank is primarily a commercial lender. The majority of its loans are commercial mortgage loans, commercial loans, and real estate construction loans. 1 to 4 family residential loans make up only 19.6% of the bank's loan portfolio.

Cathay Bank entered the Boston market in 2003, at the completion of its merger with General Bank. The bank's Massachusetts activities account for only a minor portion of the bank's overall lending, investments, and services.

Principal Officers

Chairman, President, & CEO

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

CFO

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

Chief Credit Officer

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

Employees

Number of Employees	1062 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

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

CRA Rating for Massachusetts

Rating Agency	FDIC
Most Recent Rating	2012
Overall Rating in Massachusetts	SATISFACTORY ²
Lending Test Rating in Massachusetts	High Satisfactory
Investment Test Rating in Massachusetts	Low Satisfactory
Service Test Rating in Massachusetts	High Satisfactory

¹ FDIC Institution Directory

² Based on most recent CRA Performance Evaluation by FDIC published 2012.



Discussion

**Overall rating for Massachusetts:
SATISFACTORY³**

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

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

Lending Test

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

General Responsiveness to Credit Needs

Cathay Bank's lending levels reflect an overall good responsiveness to Boston MSA credit needs. The bank consistently originates a low number of home mortgage loans in the Boston MSA. In 2011, the Boston assessment area received only 1.2 percent of the bank's HMDA loans by number and 2.2 percent of the bank's small business loans by number.⁵

Responsiveness to Low- and Moderate-Income Credit Needs

Cathay Bank exhibits an overall good record of serving the credit needs of the most economically disadvantaged areas of Boston, including low-income geographies, low-income individuals, and very small businesses.⁶

The bank's lending penetration in low- and moderate-income tracts was good. In 2011, the bank originated 7.7 percent of its 1 to 4 family property loans in low-income census tracts, significantly exceeding both the aggregate's 2.3 percent and the percentage of owner-occupied units (2.3 percent).⁷

The bank's penetration of residential property loans among low- and moderate-income borrowers is also good. In 2011, the bank originated 15.4 percent of its residential loans to low-income borrowers and 15.4 percent to moderate-income borrowers; while these numbers lag behind the percentage of families in these income brackets, they exceed the aggregate lending performance.⁸

Community Development Lending

Cathay Bank has made only a low level of community development loans in Boston. During the review period, the bank extended two community development loans totaling approximately \$10 million, which represent approximately 0.9 percent by number and 1.0 percent by dollar volume of all community development loans funded during the CRA review period.

Innovative and/or Flexible Lending Practices

Cathay Bank makes only limited use of flexible lending practices to serve assessment area credit needs. Its programs are not considered innovative, but do contain flexible lending terms to assist borrowers who would otherwise not qualify for traditional banking products.

The bank's Community Homebuyers Loan Program targets first-time homebuyers who earn less than 120 percent of median family income, or who are purchasing a residential property in a qualified low- or moderate-income census tract. During the CRA evaluation period (2010 to mid-2012), however, the bank did not originate any loans under this program.⁹

Cathay Bank's subsidiary community development corporations are tasked with development of low-income neighborhoods in California, New York, and Chicago; community development in Boston is not part of their stated mission.¹⁰

Investment Test

**Investment Test Rating for Massachusetts: LOW
SATISFACTORY¹¹**

³ Based on most recent CRA Performance Evaluation by FDIC published 2012.

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

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Ibid.

¹⁰ Cathay General Bancorp Annual Report 2012.

¹¹ Based on most recent CRA Performance Evaluation by FDIC published 2012.



Cathay Bank is rated Low Satisfactory in the investment test in Massachusetts.

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

During the review period, the bank made or held three investments in Boston totaling \$3.9 million. Current period investments include \$500,000 in a CDFI Boston Community Loan Fund. This CDFI provides financial services to underserved markets and populations.

Cathay Bank provided seven grants totaling \$60,000 (2.6 percent of total grants and donations) to various community organizations that serve community development purposes in Boston. This included a \$10,000 donation to a community group whose goal is to reduce poverty in Boston.¹²

Service Test

Service Test Rating for Massachusetts: HIGH SATISFACTORY¹³

Cathay Bank’s delivery systems are reasonably accessible to essentially all portions of the Boston assessment area.

The bank’s sole Massachusetts branch is located in a low-income census tract in Boston. This branch is full service, has an ATM, and the hours generally reflect the needs of the local communities served. This branch offers extended weekend banking hours on Saturday.¹⁴

Community Development Services

Considering the bank’s limited presence in Massachusetts, Cathay Bank provided a high level of qualified community development services in Boston. A significant majority of the bank’s community development services focus

on economic development and on providing community services to low- and moderate-income individuals. During the CRA review period 2010-2012, Cathay Bank provided 230 community development service hours (8.4 percent of all service hours) in Boston.¹⁵

The programs these service hours supported include an identity theft workshop for the local lower-income community; a bank employee served as an advisor to a non-profit agency that provides occupational services to limited English speaking, economically disadvantaged, residents; and a bank employee served as a member of a fundraising committee for a non-profit agency that provides assistance to low-income residents of the Boston Chinatown community.¹⁶

Branch Information

Branch locations in the Boston MSA:

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

¹² Ibid.

¹³ Based on most recent CRA Performance Evaluation by FDIC published 2012.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Cathay Bank’s HMDA lending levels increased during the period 2010 to 2012. However, the number of HMDA loans originated over this time represents an increasingly small percentage compared to the number of applications received. During this period, the bank both received and originated only a small number of low-income loans.¹⁷

	2010	2011	2012
HMDA Applications Received	9	10	18
HMDA Loans Originated	7	6	9
Low-Income Applications Received	1	3	6
Low-Income Loans Originated	0	2	3

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	0.4%	0.2%	0.1%
Moderate	0.1%	0.0%	0.0%
Middle	0.0%	0.0%	0.0%
Upper	0.0%	0.0%	0.0%
Total	0.1%	0.0%	0.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	1.4%	0.5%	2.5%
Moderate	1.2%	0.0%	0.3%
Middle	0.0%	0.0%	0.0%
Upper	0.0%	0.2%	0.0%
Total	0.6%	0.2%	0.4%

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Cathay Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

¹⁷ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Act Performance Evaluation, Federal Deposit Insurance Corporation; September 4, 2012.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor of the City of Boston, BankIQ; March 2013.

Cathay General Bancorp Annual Report 2012.

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

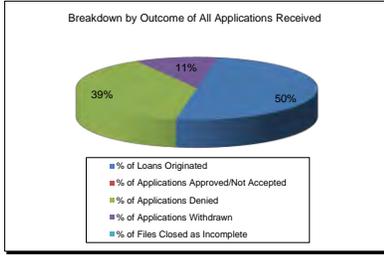
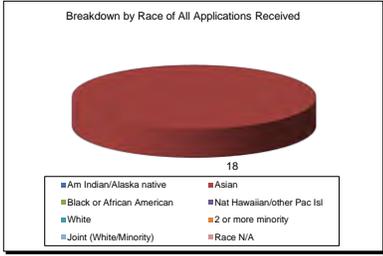
Cathay Bank website:
<http://www.cathaybank.com/>

Cathay General Bancorp HMDA Mortgage Information

2012

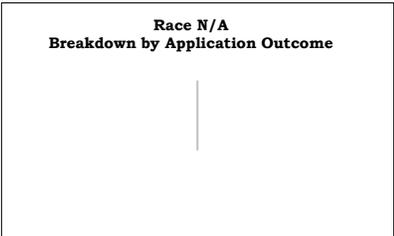
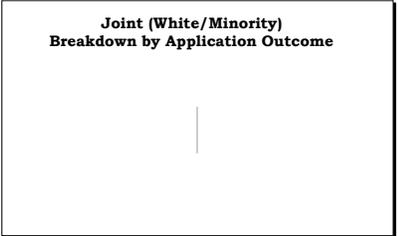
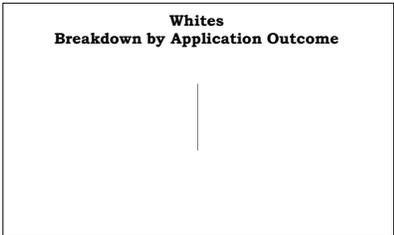
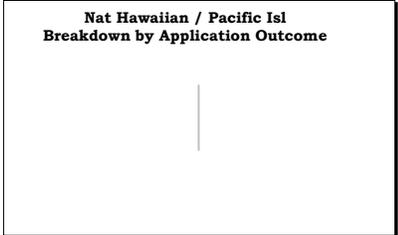
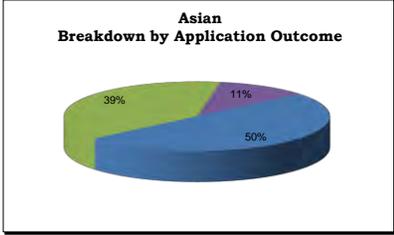
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	18	100%	9	50%	0	0%	7	39%	2	11%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	18	100%	9	50%	0	0%	7	39%	2	11%	0	0%

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



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

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

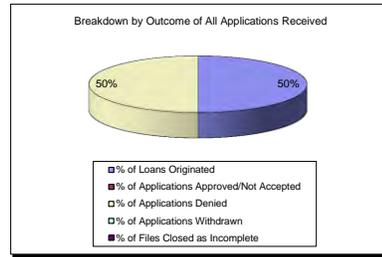
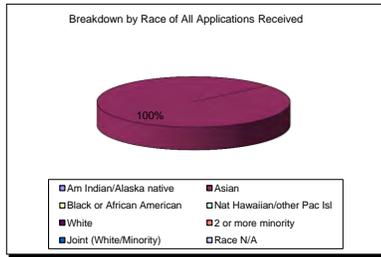


Cathay General Bancorp Low-Income Mortgage Information

2012

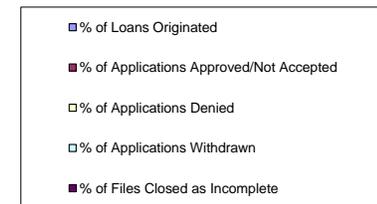
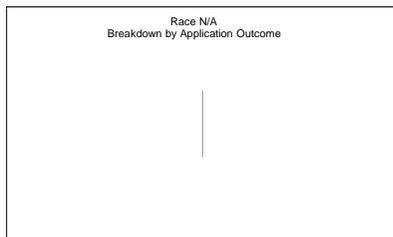
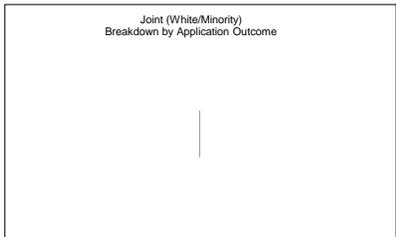
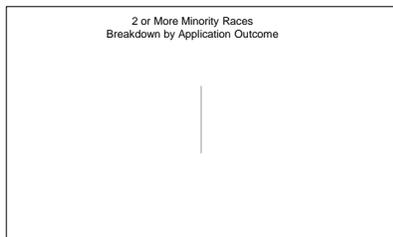
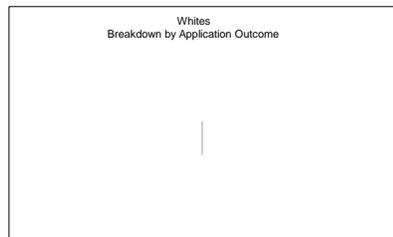
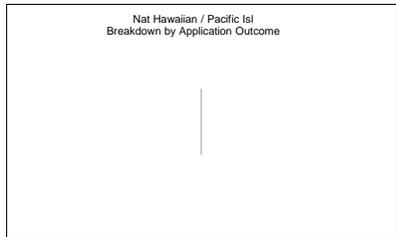
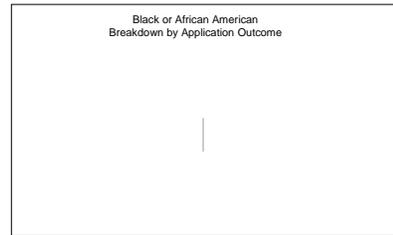
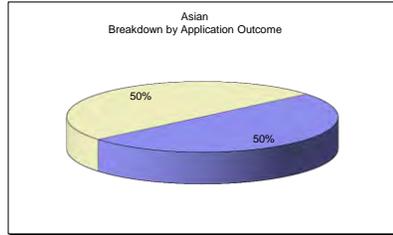
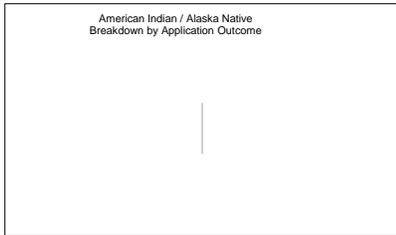
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	6	100%	3	50%	0	0%	3	50%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	6	100%	3	50%	0	0%	3	50%	0	0%	0	0%

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



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

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







Century Bank & Trust



Century Bank Overview

Century Bank & Trust
400 Mystic Ave
Medford, MA 02155

Description

Century Bank is a \$3.08 billion commercial bank headquartered in Somerville, Massachusetts. Century Bank operates 26 branches in 18 Massachusetts cities and towns. It is a wholly-owned subsidiary of Century Bancorp, Inc (NASDAQ: CNBKA).

Century Bank’s 1-4 family residential lending portfolio has grown significantly in recent years. The greatest share of the bank’s lending is in 1-4 family residential loans (\$401 million, or 37%), with a substantial proportion secured by commercial real estate (20%).

Principal Officers

CEO and President

Barry R. Sloane
400 Mystic Ave
Medford, MA 02155
866-823-6887

CFO

William P. Hornby
400 Mystic Ave
Medford, MA 02155
866-823-6887

Compliance Officer

Nancy Lindstrom
400 Mystic Ave
Medford, MA 02155
866-823-6887

Employees

Number of Employees	375 ¹⁴⁶
Number of Employees in Massachusetts	375
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	26
Branches in Boston	5
Number of ATMs in Boston	5
Number of Free-Standing ATMs in Boston	0

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2011
Overall Rating	SATISFACTORY ¹⁴⁷
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	LOW SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

¹⁴⁶ FDIC Institution Directory

¹⁴⁷ Based on most recent CRA Performance Evaluation by FDIC published 2011.



Discussion

Overall rating: SATISFACTORY¹⁴⁸

Lending Test

Lending Test Rating: HIGH SATISFACTORY¹⁴⁹

General Responsiveness to Credit Needs

Century Bank's lending activity reflects good responsiveness to credit needs in its assessment area, taking into account the number and dollar amount of home mortgage and small business loans.¹⁵⁰ Between 2010 and 2012, the bank's 1 to 4 family residential loan portfolio increased 24.3 percent.¹⁵¹

Responsiveness to Low- and Moderate-Income Credit Needs

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

Century Bank regularly surpasses the aggregate percentage of loans originated to low- and moderate-income borrowers. In 2010, the bank extended 8.6 percent of mortgage loans to low-income borrowers and 23.2 percent to moderate-income borrowers. The percentage of loans to low-income borrowers exceeds both the aggregate and the percentage of low-income residents in the assessment area. Given the economic environment within the assessment area, this performance is considered very good.¹⁵²

The bank's geographic distribution of home mortgage and small business loans also reflects a good dispersion throughout the assessment area, particularly to low- and moderate-income geographies.¹⁵³

Leadership in Community-Development

Loans

Century Bank made a relatively high level of community development loans since the last CRA evaluation. In the period 2009-2011, Century Bank originated 15 qualified community development loans, totaling \$34 million. This represented a significant increase since the last evaluation period. Given the economic environment, this performance is considered good.¹⁵⁴

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

In 2011, the Bank originated a \$198,000 loan in Roxbury. The loan was used to purchase a property which will be leased to a non-profit child and family service agency. The bank also approved a \$615,000 loan and a \$1.5 million line of credit to an organization located in the Boston area, which serves emotionally disturbed and homeless children.¹⁵⁵

Innovative or Flexible Lending Practices

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

The bank partners with two companies to offer mortgage insurance. This enables the bank to insure a certain percentage of a home mortgage loan, allowing homebuyers who do not have a sufficient down payment to obtain a mortgage. Throughout the evaluation period, the bank originated 24 loans with mortgage insurance, totaling \$8.3 million.

¹⁴⁸ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁴⁹ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁵⁰ Ibid.

¹⁵¹ FDIC Institution Directory.

¹⁵² Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁵³ Ibid.

¹⁵⁴ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁵⁵ Ibid.



Investment Test

Investment Test Rating: LOW SATISFACTORY¹⁵⁶

Century Bank had an adequate level of qualified community development investments; however, the bank is rarely in a leadership position and makes few investments that are not routinely provided by private investors. The bank exhibits an adequate responsiveness to credit and community economic development needs through its qualified grants and donations; however, the bank rarely uses innovative or complex investments to support community development initiatives.¹⁵⁷

Century Bank has made two new community development investments since the last CRA examination in 2007. In 2009 and 2010, the bank purchased two Federal National Mortgage Association Mortgage-Backed Securities. These CRA-targeted securities are tailored to meet the community development needs of a financial institution. The securities purchased were both backed by residential mortgages originated to low- or moderate-income borrowers in the bank's assessment area.¹⁵⁸

The Bank provided a good level of charitable contributions. During the evaluation period, donations totaled \$987,043.¹⁵⁹

Service Test

Service Test Rating: HIGH SATISFACTORY¹⁶⁰

Century Bank's retail banking services are essentially accessible to all portions of the assessment area, including low- and moderate-income areas and to individuals of different income levels and businesses of different sizes. Services, including branch hours, are convenient and comparable to other institutions and do not

vary in a way that inconveniences certain parts of the assessment area.¹⁶¹

Description of Service-Delivery Systems

Century Bank's service delivery systems are accessible to essentially all portions of the assessment area. The bank operates 26 branch locations, all with ATMs. The bank also offers a good variety of accounts for retail and business consumers.

Bank associates speak over 18 second languages. This reflects favorably on workplace diversity and customer service support.

Community Development Services

Century Bank provides a relatively high level of community development services, displaying a good responsiveness to the needs of low- and moderate-income individuals in the assessment area. The bank's services have resulted in a better-educated community and an increased awareness of community needs. The bank offers services to low- and moderate-income residents, and provides technical assistance to organizations with a community development purpose.¹⁶²

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

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

In addition, Century Bank's staff lends their technical expertise and experience by actively participating in local organizations.¹⁶³

¹⁵⁶ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁵⁷ Ibid.

¹⁵⁸ Ibid.

¹⁵⁹ Ibid.

¹⁶⁰ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁶¹ Ibid.

¹⁶² Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁶³ Ibid.



Branch Information

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Century Bank’s HMDA lending has steadily increased year over year from 2010 to 2012. The number of HMDA loans originated more than doubled during this period. Although the number of low-income applications has also steadily increased, the number of low-income loans originated remains nominal.¹⁶⁴

	2010	2011	2012
HMDA Applications Received	23	34	44
HMDA Loans Originated	10	25	26
Low-Income Applications Received	2	4	6
Low-Income Loans Originated	1	1	3

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	0.5%	0.2%	0.9%
Moderate	1.1%	0.3%	0.8%
Middle	1.0%	0.4%	0.4%
Upper	0.9%	0.5%	0.7%
Total	0.9%	0.4%	0.7%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	2.0%	0.3%	5.5%
Moderate	4.0%	1.5%	3.8%
Middle	3.3%	3.5%	0.9%
Upper	3.1%	1.4%	3.8%
Total	3.1%	1.7%	3.6%

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Century Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁶⁴ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

Century Bank Annual Report, 2011 and 2012.

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

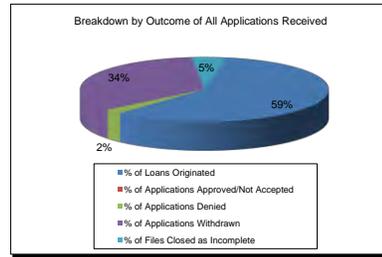
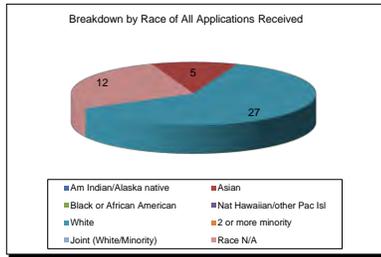
Century Bank website:
<http://www.centurybank.com/>

Century Bank HMDA Mortgage Information

2012

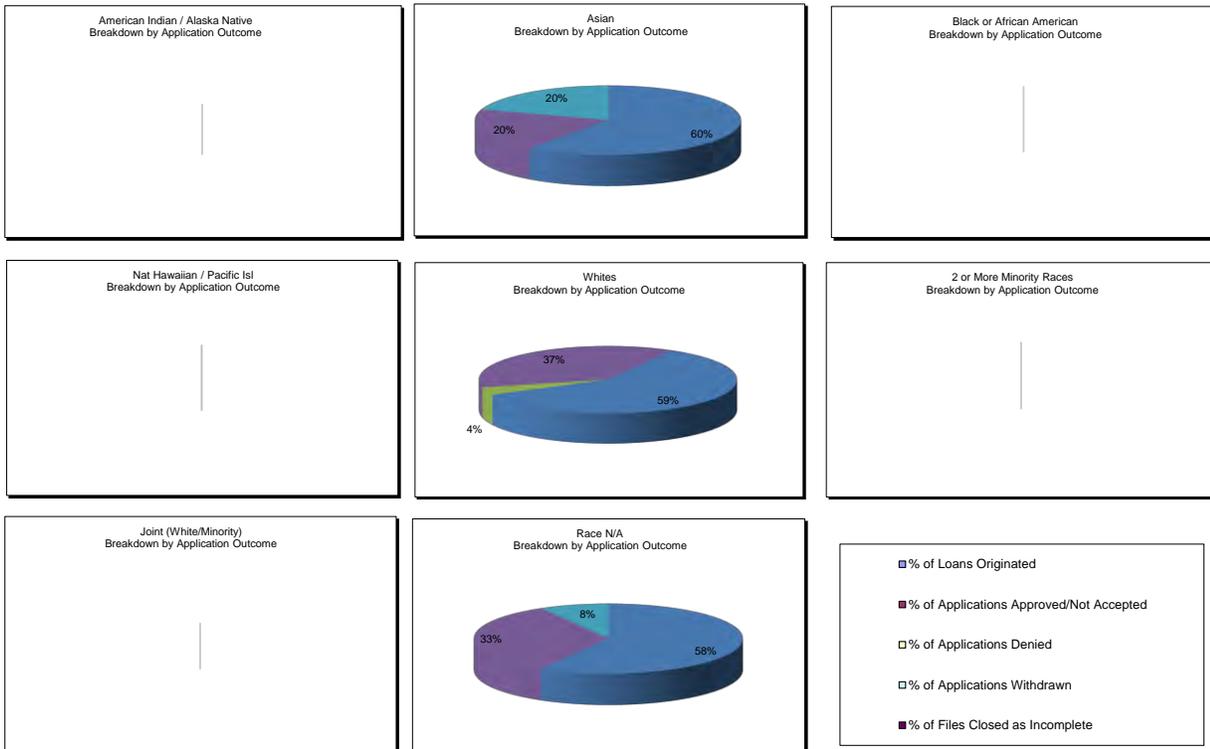
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	5	11%	3	60%	0	0%	0	0%	1	20%	1	20%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	27	61%	16	59%	0	0%	1	4%	10	37%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	12	27%	7	58%	0	0%	0	0%	4	33%	1	8%
Total	44	100%	26	59%	0	0%	1	2%	15	34%	2	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 applications received, those originated are highlighted in blue, those not accepted are in red, etc.

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

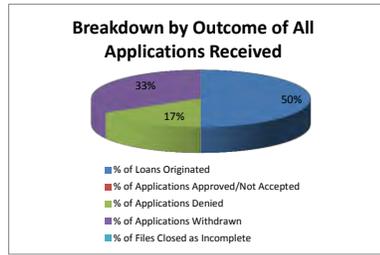
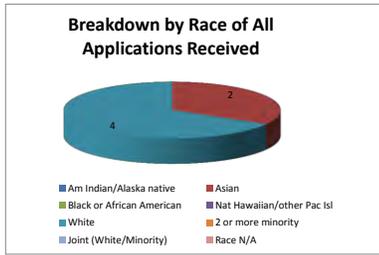


Century Bank Low-Income Mortgage Information

2012

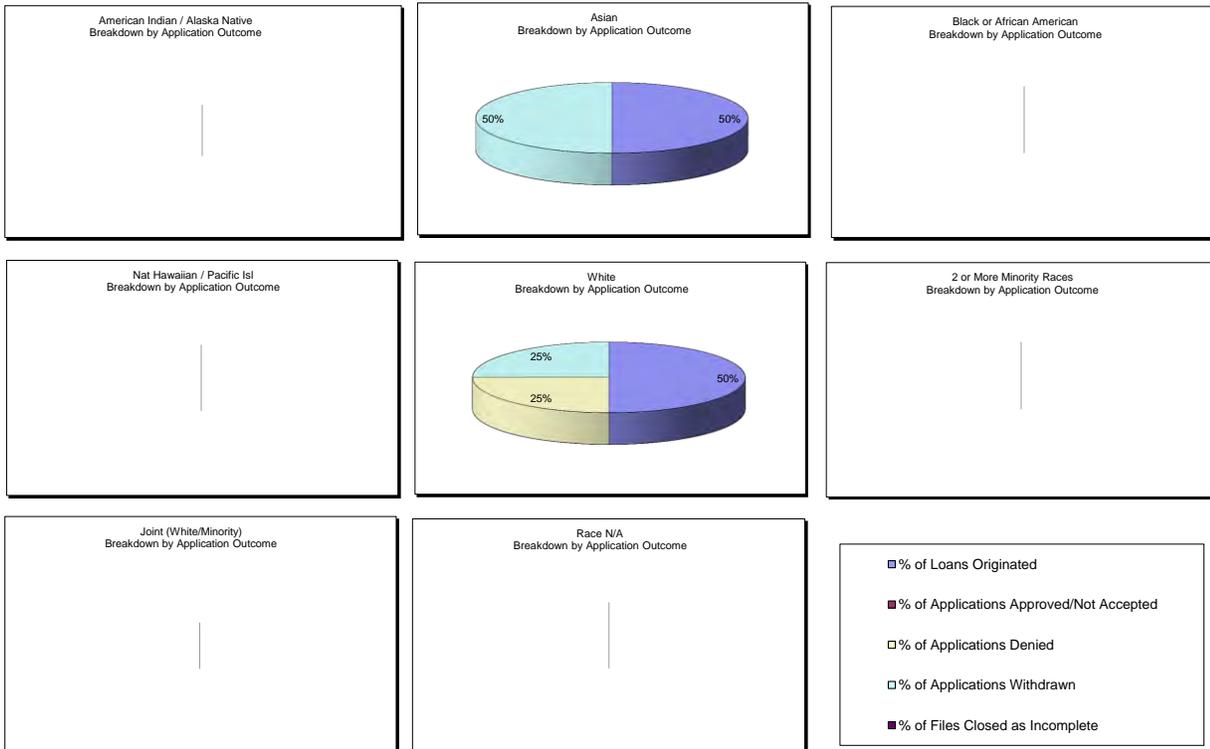
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	2	33%	1	50%	0	0%	0	0%	1	50%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	4	67%	2	50%	0	0%	1	25%	1	25%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	6	100%	3	50%	0	0%	1	17%	2	33%	0	0%

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Commonwealth Cooperative Bank



Commonwealth Cooperative Bank

Overview

Commonwealth Cooperative Bank
 1172 River Street
 Hyde Park, MA 02136

Description

Commonwealth Cooperative Bank is a \$172.1 million state-chartered co-operative bank with principal offices in Boston, Massachusetts. The bank is the result of a 2008 merger with Hyde Park Cooperative Bank.

The combined institution is primarily a residential lender. 76 percent of the bank's loans are secured by one-to-four family dwellings. Commonwealth Cooperative Bank participates in first-time homebuyer programs and a Soft Second program. In 2012, Commonwealth Cooperative operated three branches in Boston.

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

Principal Officers

President & CEO/Chairman

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

CFO

Robert W. Drouin
 1172 River Street
 Hyde Park, MA 02136
 617-364-6000

Senior Vice President - Lending

William E. Smith
 1172 River Street
 Hyde Park, MA 02136
 617-364-6000

Employees

Number of Employees	26 ¹⁶⁵
Number of Employees in Massachusetts	26
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

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

CRA Rating

Rating Agency	Office of Thrift Supervision
Most Recent Rating	2008
Overall Rating	SATISFACTORY¹⁶⁶
Lending Test Rating	NOT RATED
Investment Test Rating	NOT RATED
Service Test Rating	NOT RATED

¹⁶⁵ FDIC Institution Directory.

¹⁶⁶ Based on most recent CRA Performance Evaluation by OTS published 2008.



Discussion

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

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

Overall rating: SATISFACTORY¹⁶⁷

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

Lending in low-income geographies was very limited, while lending in moderate-income geographies was commensurate with the aggregate's performance.¹⁶⁸

Lending Test

Lending Test Rating: NOT RATED

The bank's average loan-to-deposit ratio for the CRA assessment period (2005-2008) was 87 percent. This is an improvement from the 60 percent average at the last evaluation, but still lags behind comparable area institutions. Based on the institution's size and competitive factors, the loan-to-deposit meets the standard for satisfactory performance.¹⁶⁹

The post-merger Commonwealth Cooperative Bank had a loan-to-deposit ratio of 1.04 in 2012, a significant improvement.¹⁷⁰

General Responsiveness to Credit Needs

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

Responsiveness to Low- and Moderate-Income Credit Needs

During the assessment period, the bank's level of lending to low- and moderate-income borrowers exceeded the aggregate level. The bank was less successful in its penetration of low- and moderate-income geographies.¹⁷¹

Innovative or Flexible Lending Practices

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

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

Commonwealth Cooperative bank participates in the Soft Second loan program.¹⁷²

Investment Test

Investment Test Rating: NOT RATED

Service Test

Service Test Rating: NOT RATED

Branch Information:

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

¹⁶⁷ Based on most recent CRA Performance Evaluation by OTS published 2008.

¹⁶⁸ Ibid.

¹⁶⁹ Ibid.

¹⁷⁰ FDIC Institution Directory.

¹⁷¹ Based on most recent CRA Performance Evaluation by OTS published 2008.

¹⁷² Commonwealth Cooperative Bank website.



Additional Information

The bank’s Hyde Park Cooperative Charitable Foundation raises money for charitable, civic, educational, and social projects within the local community. The Foundation, which still operates under the same name, has made donations to a large number of community organizations, including Mass Affordable Housing, the Hyde Park Civic Association, and many others.¹⁷³

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Following a marked increase in the number of HMDA loan applications and originations in 2011, Commonwealth Cooperative Bank’s 2012 HMDA lending was roughly consistent with 2010 levels. The bank’s low-income loan applications and originations, while significantly lower than 2010 levels, remained the same from 2011 to 2012.¹⁷⁴

	2010	2011	2012
HMDA Applications Received	17	28	16
HMDA Loans Originated	13	23	10
Low-Income Applications Received	8	3	3
Low-Income Loans Originated	7	1	1

Small Business Loans

No 2012 HMDA-reportable small business loan data was available for Commonwealth Cooperative Bank.¹⁷⁵

Loan Information By Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁷³ Commonwealth Cooperative Bank website.

¹⁷⁴ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

¹⁷⁵ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

FDIC Institution Directory:
<http://www2.fdic.gov/idasp>

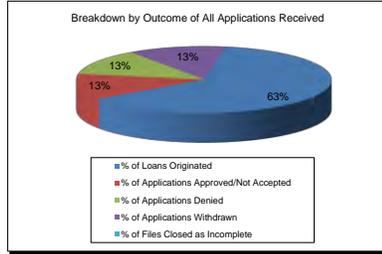
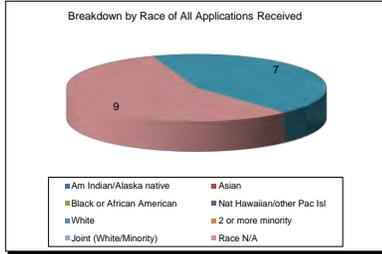
Commonwealth Cooperative Bank website:
<http://www.commonwealthcoop.com/>

Commonwealth Cooperative HMDA Mortgage Information

2012

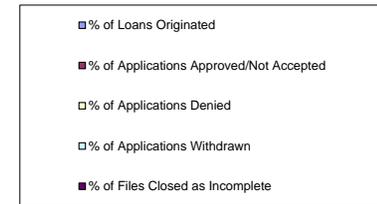
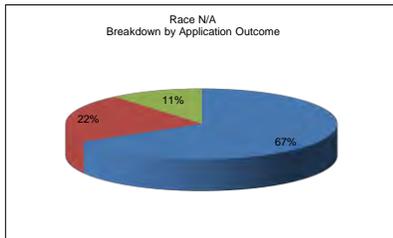
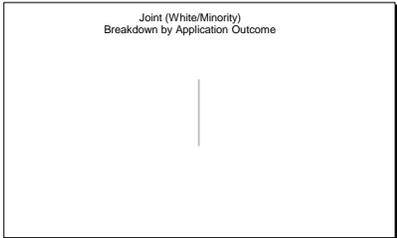
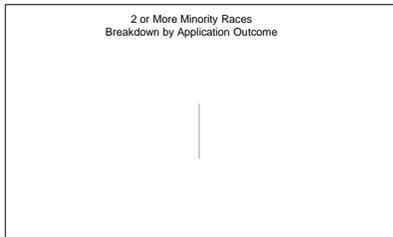
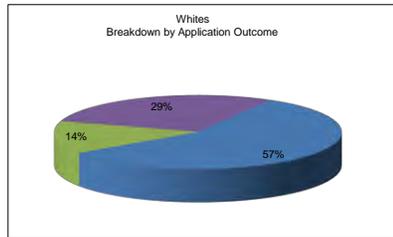
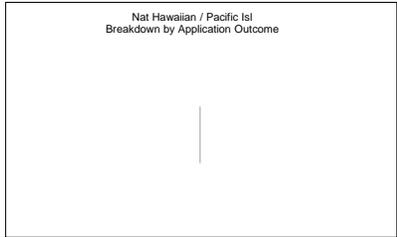
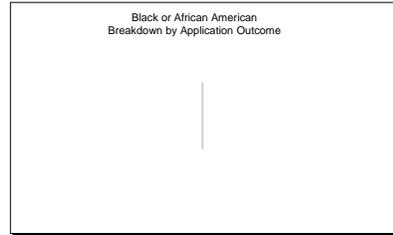
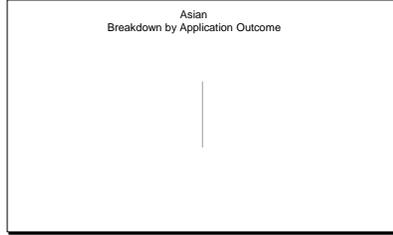
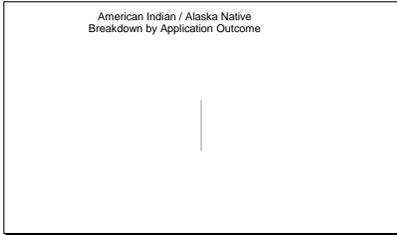
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	7	44%	4	57%	0	0%	1	14%	2	29%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	9	56%	6	67%	2	22%	1	11%	0	0%	0	0%
Total	16	100%	10	63%	2	13%	2	13%	2	13%	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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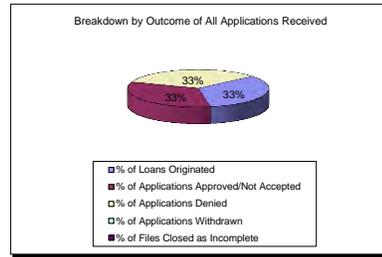
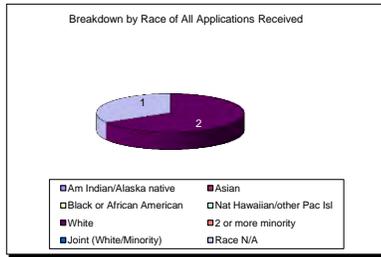


Commonwealth Cooperative Low-Income Mortgage Information

2012

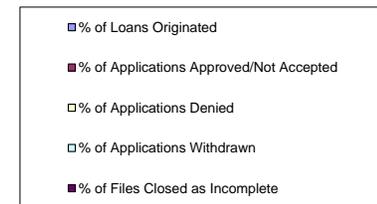
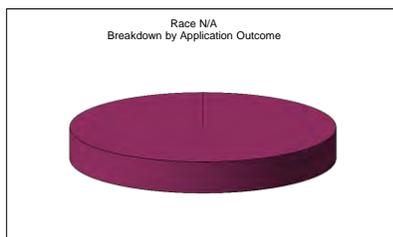
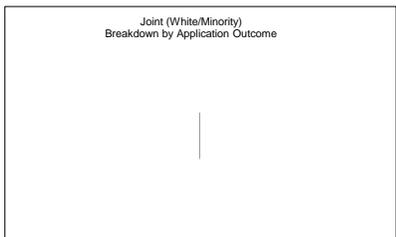
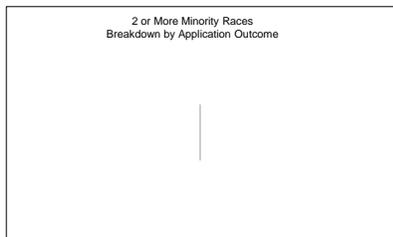
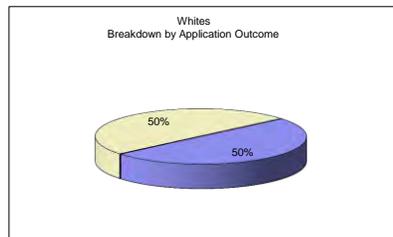
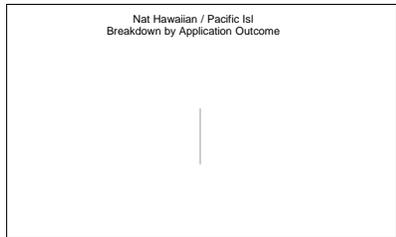
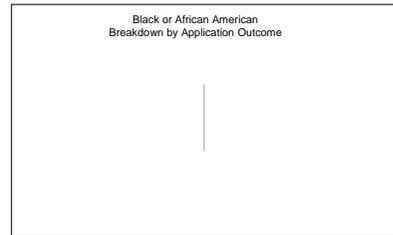
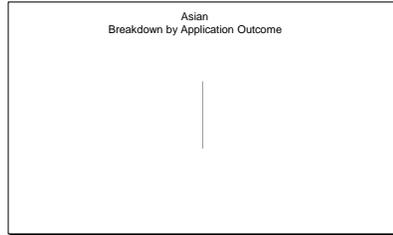
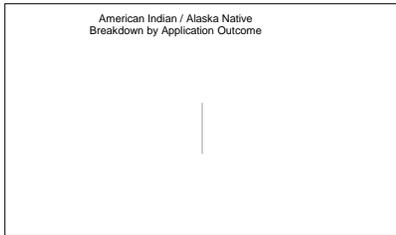
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Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	67%	1	50%	0	0%	1	50%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	33%	0	0%	1	100%	0	0%	0	0%	0	0%
Total	3	100%	1	33%	1	33%	1	33%	0	0%	0	0%

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



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

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



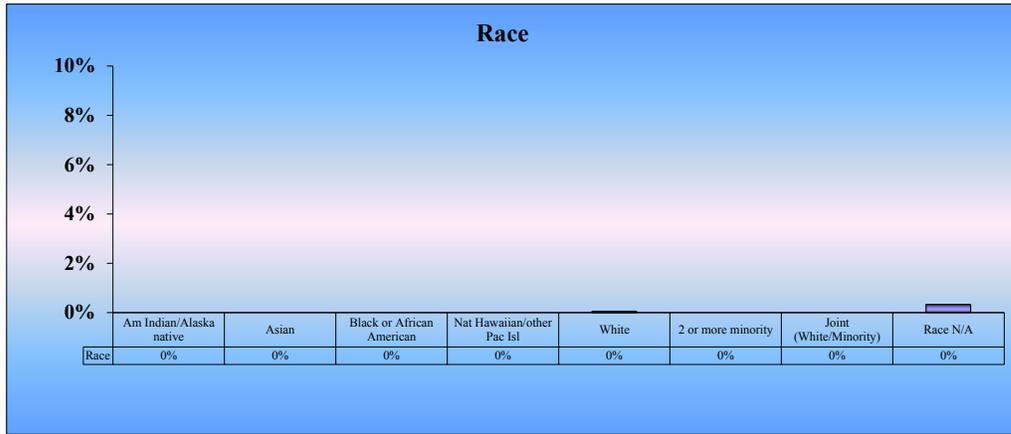
Compared against the MSA Aggregate Total

2012

Commonwealth Cooperative HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	8	0%	5	0%	0	0%	2	0%	1	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	9	0%	8	0%	1	1%	0	0%	0	0%	0	0%
Total	17	0%	13	0%	1	0%	2	0%	1	0%	0	0%

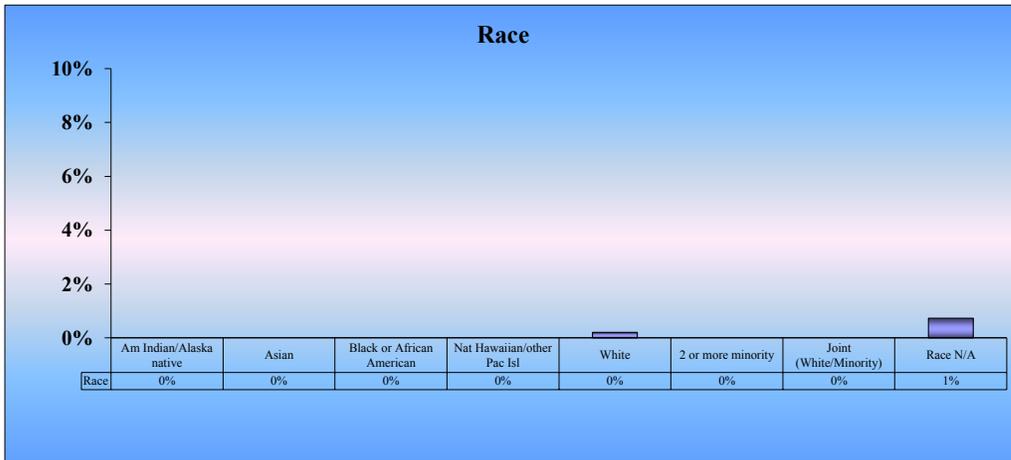
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Commonwealth Cooperative Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	2	0%	1	0%	0	0%	1	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	1	1%	0	0%	1	17%	0	0%	0	0%	0	0%
Total	3	0%	1	0%	1	2%	1	0%	0	0%	0	0%

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





East Boston Savings Bank



East Boston Savings Bank Overview

East Boston Savings Bank
 10 Meridian Street
 Boston, MA 02128

CFO

Mark L. Abbate
 10 Meridian Street
 Boston, MA 02128
 978-977-2220

Description

East Boston Savings Bank (EBSB) is a \$2.25 billion Massachusetts-chartered stock savings bank with its main office in East Boston. EBSB is a subsidiary of Meridian Interstate Bancorp, a bank holding company.

In 2010, Meridian Interstate Bancorp completed its acquisition of Mt. Washington Cooperative Bank, a \$496 million, mutually owned community bank headquartered in South Boston. Mt. Washington Bank now operates as a division of EBSB. The combined bank has 27 full-service branch offices throughout the greater Boston area.

EBSB has historically been primarily a residential real estate lender, but in 2012 its commercial lending portfolio increased by over 50%, to make up 46 percent of the bank’s loan portfolio. 29 percent of the bank’s total real estate loans are secured by 1-4 family residences.

Principal Officers

Chairman & CEO

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

President & COO

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

Employees

Number of Employees	415 ¹⁷⁶
Number of Employees in Massachusetts	415
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	27
Branches Within Boston MSA	12
Number of ATMs	32
Number of Free-Standing ATMs	5

CRA Rating

Rating Agency	FDIC
Most Recent Rating	2011
Overall Rating	SATISFACTORY ¹⁷⁷
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	SATISFACTORY
Service Test Rating	HIGH SATISFACTORY

¹⁷⁶ FDIC Institution Directory.

¹⁷⁷ Based on most recent CRA Performance Evaluation by FDIC published 2011.



Discussion

Overall rating: SATISFACTORY¹⁷⁸

Lending Test

Lending Test Rating: HIGH SATISFACTORY¹⁷⁹

EBSB's Lending Test performance is rated "High Satisfactory."

Overall, EBSB's home mortgage and small business lending activity reflects good responsiveness to assessment area credit needs. The bank's average loan to deposit ratio for the evaluation period (2009-2011) is 82.9 percent, an increase since the prior evaluation. Following the bank's merger with Mt. Washington Bank, EBSB is ranked 16th out of 442 institutions for home mortgage lending in Massachusetts.¹⁸⁰

Responsiveness to Low- and Moderate-Income Credit Needs

EBSB's home mortgage and small business loans display a good dispersion throughout the assessment area, especially in low- and moderate-income geographies, when compared to assessment area's demographics and aggregate lending performance. EBSB originated 5.9 percent of its home mortgages in low-income census tracts in 2011. This exceeds both the percentage of owner-occupied housing units located in low-income tracts and the aggregate performance. The bank was even more successful at originating home-purchase loans in low-income census tracts, at 8.5 percent in 2010 and 2011.¹⁸¹

EBSB was equally successful at extending home mortgage loans in moderate-income census tracts. This further reflects the Bank's ability to meet the credit needs of the assessment area's low-income tracts.¹⁸²

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

EBSB's small business activity in the assessment area reflects excellent penetration among businesses of different sizes.¹⁸³

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

Leadership in Community Development Loans

EBSB made an adequate level of community development loans during the evaluation period, demonstrating reasonable responsiveness to the community development credit needs of its assessment area. Between January 2009 and November 2011, the Bank made 11 community development loans totaling \$23.3 million.¹⁸⁴

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

In August 2011, EBSB made a \$3 million loan to a Dorchester-based non-profit that provides medical and community services to low- and moderate-income individuals.¹⁸⁵

¹⁷⁸ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁷⁹ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁸⁰ Ibid.

¹⁸¹ Ibid.

¹⁸² Ibid.

¹⁸³ Ibid.

¹⁸⁴ Ibid.

¹⁸⁵ Ibid.



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

In 2010, EBSB established a non-profit entity, Investment in Affordable Housing, LLC, with Neighborhood of Affordable Housing (NOAH) as 1.0 percent owner in the entity. The intention of this LLC is to invest in affordable housing projects, and included a capital injection of \$500,000 by EBSB. It is noted that the Bank has proactively sought opportunities for investment in affordable housing through this LLC.¹⁸⁶

Innovative and Flexible Lending Practices

EBSB uses innovative and flexible lending programs to meet the credit needs of low- and moderate-income borrowers, first-time homebuyers, and small businesses.¹⁸⁷

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

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

EBSB continues to offer several innovative or flexible lending programs:¹⁸⁸

- The bank's Credit Builder program helps individuals with poor or non-existent credit to establish a good credit record.
- EBSB participates in Federal Housing Administration fixed-rate mortgage programs for low- and moderate-income homebuyers.
- The bank offered several different flexible lending programs through the Massachusetts Housing Financing Agency (MassHousing), including MassHousing Mortgage Programs, and the MassHousing Purchase and Rehabilitation Program.
- EBSB participates in the City of Boston's Financial Assistance Program, which offers

downpayment assistance for the purchase of a 1-3 family home.

In 2012, EBSB was recognized by MassHousing as one of its top-producing lenders. EBSB was MassHousing's second top producer of loans to minority borrowers (31 loans for \$7.8 million) and was the 15th top overall producer of MassHousing loans in the state, with 86 loans totaling \$22.8 million.¹⁸⁹

Investment Test

Investment Test Rating: SATISFACTORY¹⁹⁰

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

The bank has an adequate level of qualified equity investments. EBSB invested \$7.4 million in Massachusetts Housing Finance Agency bonds, an investment vehicle designed to increase the availability of affordable housing throughout Massachusetts.¹⁹¹

EBSB made a significant level of qualified charitable donations to help address a wide variety of community development needs within the designated assessment area. The Bank made a majority of its community development donations through the Meridian Charitable Foundation (\$376,026 during the evaluation period) and the Mt. Washington Charitable Foundation (\$295,157 during the evaluation period). All these donations are considered to be for a community development purpose.¹⁹²

EBSB also made direct donations to qualified organizations, totaling over \$123,000 in 2011. This includes a \$102,000 contribution to WORK, Inc., a Dorchester-based organization that provides support services to individuals with physical and/or developmental disabilities.

¹⁸⁶ Ibid.

¹⁸⁷ Ibid.

¹⁸⁸ Ibid.

¹⁸⁹ MassHousing website.

¹⁹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁹¹ Ibid.

¹⁹² Ibid.



Service Test

Service Test Rating: HIGH SATISFACTORY¹⁹³

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

Description of Service-Delivery Systems

The Bank’s branches, some with 24-hour drive-up ATMs, are located throughout the assessment area and are easily accessible and convenient. Changes in branch locations have improved the accessibility of its delivery systems, particularly to moderate-income geographies, due to the acquisition of Mt. Washington Bank.¹⁹⁴

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

Overall, the Bank’s services and business hours do not vary in a way that would inconvenience any portion of the assessment area.¹⁹⁵

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

Bilingual employees are available at many branch locations. Languages spoken include Italian, Spanish, French, Mandarin, Portuguese, and Vietnamese. This reflects favorably in terms of workplace diversity and customer service support.¹⁹⁶

Community Development Services

EBSB provided a relatively high level of community development services.

Bank management and employees developed and participated in educational seminars targeted

toward low- and moderate-income borrowers and first-time homebuyers. The Bank devoted many hours to planning and participating in educational seminars on the homebuying process. The bank organized other educational programs, including a nonprofit executive leadership seminar and the FDIC Money Smart Program.¹⁹⁷

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

EBSB also has a home mortgage loan modification program for those borrowers who can show an economic hardship. The bank generally follows the Home Affordable Modification Program qualification guidelines.¹⁹⁸

¹⁹³ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁹⁴ Ibid.

¹⁹⁵ Ibid.

¹⁹⁶ Ibid.

¹⁹⁷ Ibid.

¹⁹⁸ Ibid.



Branch Information:

Branch locations in the Boston MSA:

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

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

East Boston Savings Bank's HMDA lending declined from 2010 to 2011 in terms of both applications received (25% decrease) and loans originated (20% decrease). In 2012, HMDA lending moved back upward toward, but still below, 2010 levels.

While the number of low-income applications received by the bank remained nearly the same from 2010 to 2012, the number of originations increased year-over-year during this period.¹⁹⁹

	2010	2011	2012
HMDA Applications Received	285	211	236
HMDA Loans Originated	207	165	184
Low-Income Applications Received	12	12	13
Low-Income Loans Originated	4	7	10

¹⁹⁹ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2011.



Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	0.0%	0.1%	0.3%
Moderate	0.8%	0.6%	0.7%
Middle	0.3%	0.4%	0.6%
Upper	0.0%	0.0%	0.1%
Total	0.3%	0.3%	0.3%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	0.1%	0.4%	3.0%
Moderate	6.9%	6.9%	5.8%
Middle	2.2%	4.1%	10.7%
Upper	0.0%	0.0%	0.8%
Total	2.3%	2.7%	3.5%

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for East Boston Savings Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

Massachusetts Housing Finance Agency (MassHousing) Website
www.masshousing.com

FDIC Institution Directory:
<http://www2.fdic.gov/idasp>

Meridian Interstate Bancorp, Inc., 2012 Annual Report.

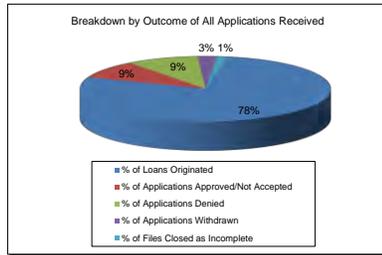
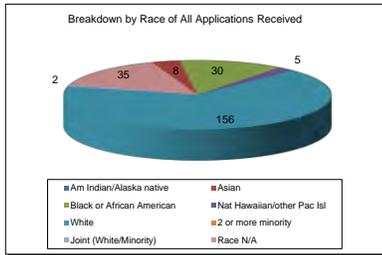
East Boston Savings Bank website:
<http://www.ebsb.com/>

East Boston Savings Bank HMDA Mortgage Information

2012

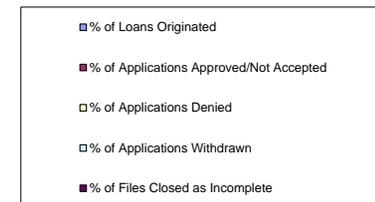
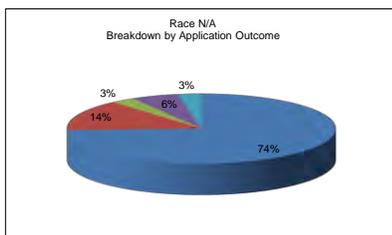
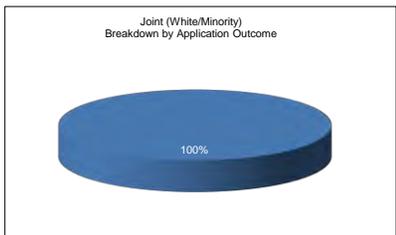
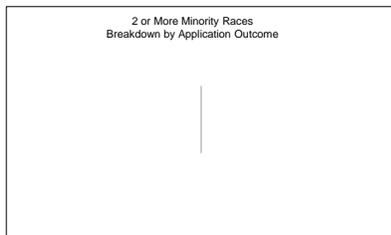
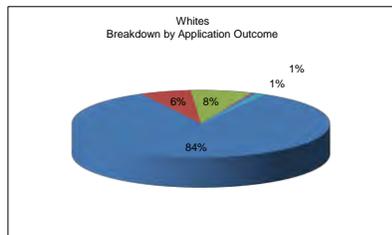
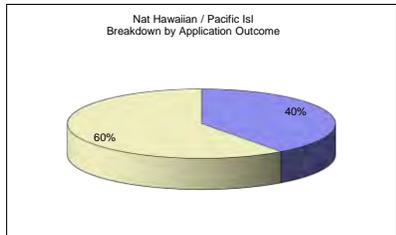
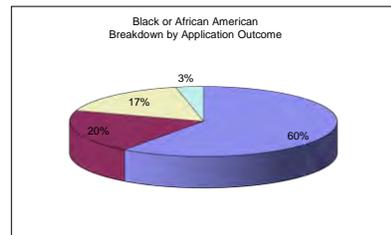
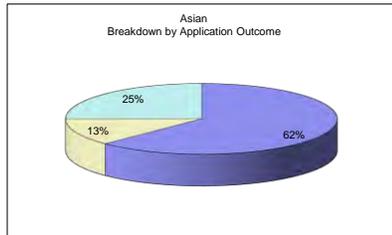
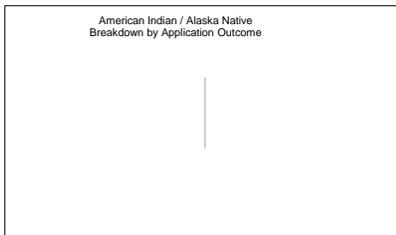
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	8	3%	5	63%	0	0%	1	13%	2	25%	0	0%
Black or African American	30	13%	18	60%	6	20%	5	17%	1	3%	0	0%
Nat Hawaiian/other Pac Isl	5	2%	2	40%	0	0%	3	60%	0	0%	0	0%
White	156	66%	131	84%	10	6%	12	8%	1	1%	2	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	35	15%	26	74%	5	14%	1	3%	2	6%	1	3%
Total	236	100%	184	78%	21	9%	22	9%	6	3%	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 applications received, those originated are highlighted in blue, those not accepted are in red, etc.

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

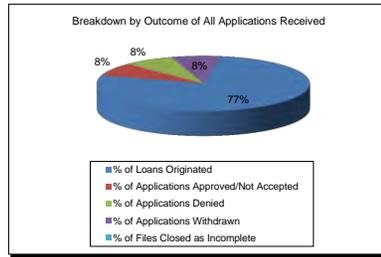
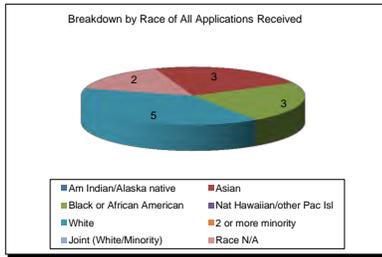


East Boston Savings Bank Low-Income Mortgage Information

2012

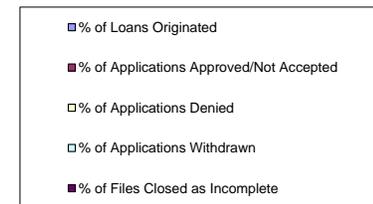
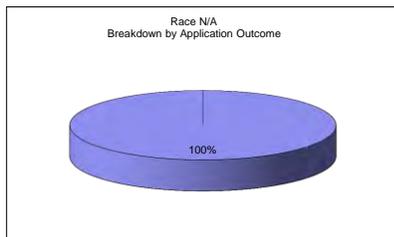
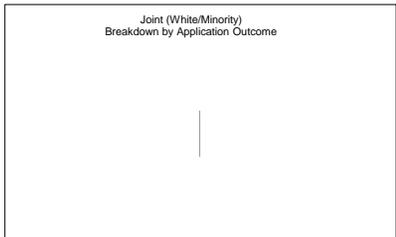
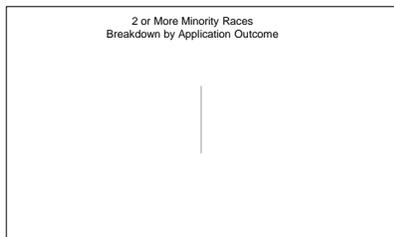
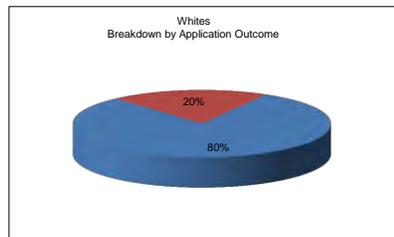
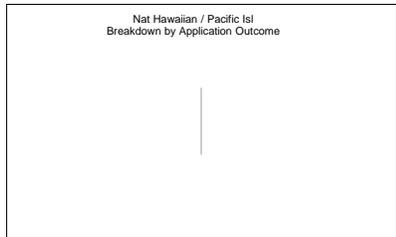
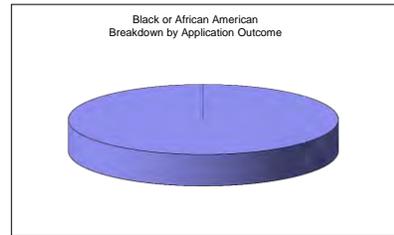
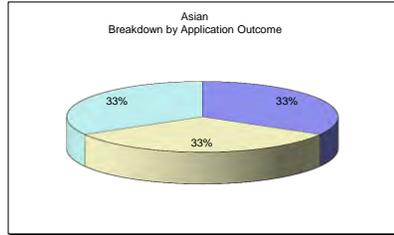
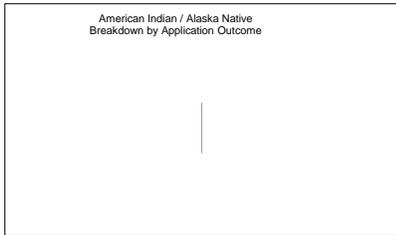
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Asian	3	23%	1	33%	0	0%	1	33%	1	33%	0	0%
Black or African American	3	23%	3	100%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	5	38%	4	80%	1	20%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	15%	2	100%	0	0%	0	0%	0	0%	0	0%
Total	13	100%	10	77%	1	8%	1	8%	1	8%	0	0%

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



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

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



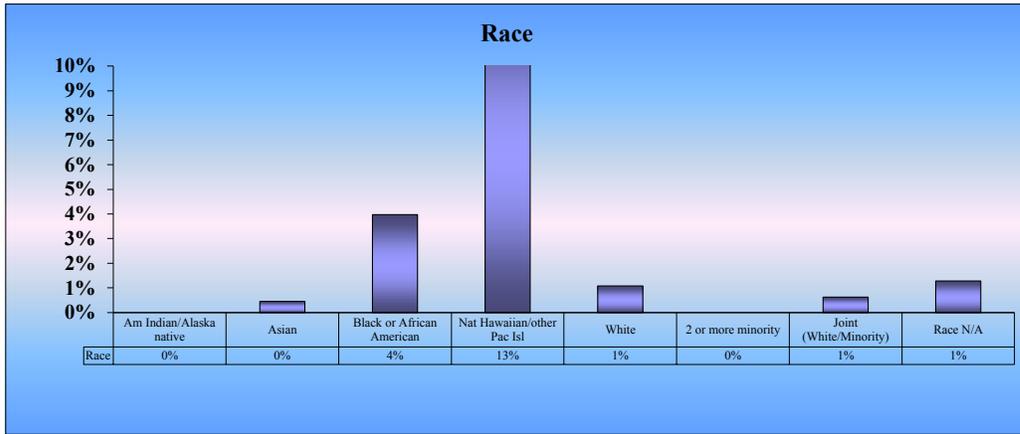
Compared against the MSA Aggregate Total

2012

East Boston Savings Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	8	0%	5	0%	0	0%	1	0%	2	1%	0	0%
Black or African American	30	4%	18	4%	6	24%	5	3%	1	2%	0	0%
Nat Hawaiian/other Pac Isl	5	13%	2	8%	0	0%	3	38%	0	0%	0	0%
White	156	1%	131	1%	10	2%	12	1%	1	0%	2	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	2	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	35	1%	26	1%	5	5%	1	0%	2	1%	1	1%
Total	236	1%	184	1%	21	3%	22	1%	6	0%	3	1%

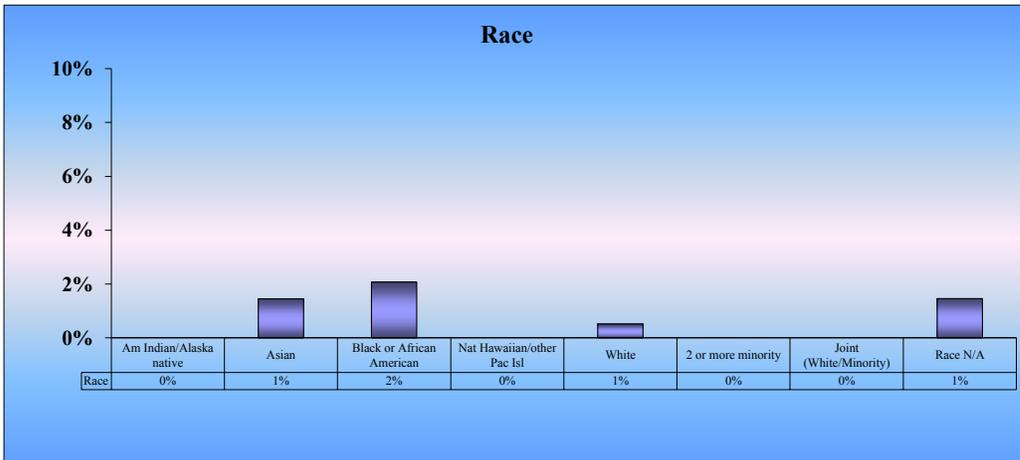
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



East Boston Savings Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	3	1%	1	1%	0	0%	1	3%	1	7%	0	0%
Black or African American	3	2%	3	4%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	5	1%	4	1%	1	3%	0	0%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	1%	2	3%	0	0%	0	0%	0	0%	0	0%
Total	13	1%	10	1%	1	2%	1	0%	1	1%	0	0%

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







Eastern Bank



Eastern Bank Overview

Eastern Bank & Trust
265 Franklin Street
Boston, MA 02110

Description

Eastern Bank, founded in 1818, is the fourth-largest full-service consumer bank in Greater Boston. Eastern Bank is a wholly owned subsidiary of Eastern Bank Corporation, a mutual bank holding company. With \$8.58 billion in assets, Eastern Bank is headquartered in Boston and maintains regional offices in Middleborough and Lynn.

Eastern Bank engages in diverse lines of business, including mortgage banking, small business banking, corporate and asset-based lending, consumer banking and finance, and investment management. Loans represent 53 percent of total assets; 30% of the bank’s loan portfolio is commercial real estate loans, while 31% is home mortgage loans.

In 2011, Eastern Bank Corporation completed its acquisition of Wainwright Bank & Trust, in a transaction valued at \$163 million.

Principal Officers

Chairman & CEO

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

CFO

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

EVP, Consumer Banking

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

Employees

Number of Employees	1558 ¹
Number of Employees in Massachusetts	1558
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	94
Branches within Boston MSA	8
Number of ATMs	98
Number of Free-Standing ATMs	4

CRA Rating

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

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



Discussion

Overall rating: OUTSTANDING³

Lending Test

Lending Test Rating:
HIGH SATISFACTORY⁴

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

General Responsiveness to Credit Needs

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

The bank’s home mortgage lending activity reflects good responsiveness to assessment area credit needs. Eastern Bank consistently ranks among the top home mortgage lenders inside its assessment area; those institutions ranking higher are primarily large mortgage companies and large national or regional banks.⁶

This bank’s level of small business lending reflects excellent responsiveness to assessment area credit needs. Eastern Bank was named the number one U.S. Small Business Administration lender in Massachusetts in 2013 for the fifth consecutive year; and the number one SBA lender in all of New England in for the fourth consecutive year. In 2011 and 2012, the bank deepened its commitment to small business lending by partnering with microfinance lender Accion USA to bring more affordable loans to entrepreneurs.⁷

Responsiveness to Low- and Moderate-Income Credit Needs

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

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

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

Leadership in Community Development Loans

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

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

Innovative & Flexible Lending Practices

Eastern Bank made extensive use of innovative and flexible lending programs that were responsive to assessment area credit needs. The bank has an established record of using innovative and flexible lending programs to

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

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

⁵ Ibid.

⁶ Ibid.

⁷ Eastern Bank Annual Report 2012.

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

⁹ Ibid.

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



serve low- and moderate-income borrowers and geographies, as well as small businesses.¹¹

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

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

Investment Test

Investment Test Rating: OUTSTANDING¹²

Eastern Bank's level of qualified investments and donations is excellent; however, investments are limited in complexity and are routinely provided by other investors. The bank's qualified investments have community development purposes that benefit communities throughout the bank's entire assessment area.¹³

The bank's qualified investments, commitments, and grants total \$42.4 million as of mid-2011. This total includes \$16.1 million in new investments since mid-2007, \$21.0 million in prior period investments still held by the bank, and \$5.3 million in qualified donations. The bank's qualified investments totaling \$37,108,971 represented approximately 6.1 percent of Tier 1 capital as of March 31, 2011. This volume of investments and donations demonstrates Eastern Bank's commitment to investing in community development initiatives.¹⁴

The vast majority of the bank's grants are made through the Eastern Bank Charitable Foundation. The Foundation was established for the purpose of supporting community, charitable, educational, and other benevolent organizations.

Eastern Bank contributes 10 percent of annual pre-tax net operating income to the Charitable Foundation.

Eastern Bank Charitable Foundation extended over \$10 million in total grants between April 2007 and March 2011, which further demonstrates the bank's commitment to supporting non-profit organizations with diverse missions and goals.¹⁵

Service Test

Service Test Rating: OUTSTANDING¹⁶

Eastern Bank's retail banking services are excellent. The bank's branch locations and record of opening and closing branches reflects a good penetration in low- and moderate-income geographies. The bank offers a variety of alternative retail banking services, including services targeted toward low- and moderate-income individuals.¹⁷

Description of Service-Delivery Systems

Eastern Bank operates 94 full-service branch offices. Branch hours are convenient and vary according to location based on the needs of each individual community. In addition to branch banking, Eastern Bank offers a number of alternative delivery systems that enhance customer accessibility to services regardless of geographic location.

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

Community Development Services

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

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

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

¹³ Ibid.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁷ Ibid.



economic development, and community organizations throughout the assessment area.¹⁸

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

In June 2010, the bank sponsored a Money Smart "Train-the-Trainer" session, which provided guidance to various non-profit agencies on how to deliver quality financial education. In 2010 alone, bank employees conducted ten classes for various community-based organizations and schools.¹⁹

During the CRA evaluation period, the bank was involved in 85 homebuyer seminars, 55 financial literacy training events and 13 foreclosure prevention seminars. These events were offered through community organizations throughout Massachusetts.

Educational outreach at this level indicates the Bank's dedication to raising the degree of financial literacy in the communities it serves.²⁰

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

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
246 Border Street Boston, MA 02128	✓	✓
155 Dartmouth Street Boston, MA 02116	✓	✓
63 Franklin Street Boston, MA 02110	✓	✓

265 Franklin Street Boston, MA 02110	✓	✓
470 West Broadway Boston, MA 02127	✓	✓
1906 Dorchester Avenue Dorchester, MA 02124	✓	✓
687 Centre Street Jamaica Plain, MA 02130	✓	✓
2029 Centre Street West Roxbury, MA 02132	✓	✓

FSB: Full Service Branch

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Eastern Bank's HMDA lending steadily increased from 2010 to 2012, both in terms of applications received and loans originated.

The number of low-income loans originated significantly increased from 2010 to 2011, before falling below 2010 levels in 2012.²¹

	2010	2011	2012
HMDA Applications Received	137	182	219
HMDA Loans Originated	83	115	136
Low-Income Applications Received	18	32	24
Low-Income Loans Originated	11	19	9

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	2.3%	2.4%	1.8%
Moderate	1.6%	1.1%	2.2%
Middle	1.4%	1.2%	1.3%
Upper	1.8%	1.4%	1.7%
Total	1.7%	1.5%	1.7%

¹⁸ Based on most recent CRA Performance Evaluation by FDIC published 2011.

¹⁹ Ibid.

²⁰ Ibid.

²¹ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	14.4%	16.4%	8.7%
Moderate	6.1%	5.3%	13.3%
Middle	6.7%	8.4%	9.1%
Upper	7.4%	7.9%	8.7%
Total	8.4%	9.6%	9.6%

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for Eastern Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

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

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

Eastern Bank Annual Report, 2011 and 2012.

Eastern Bank Charitable Foundation Annual Report, 2012.

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

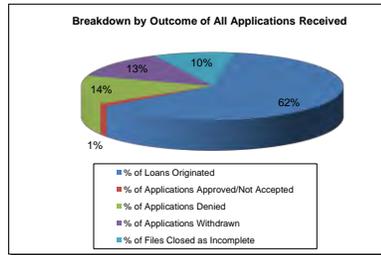
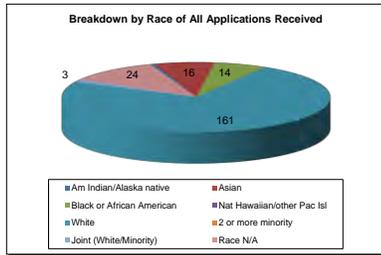
Eastern Bank website:
<http://www.easternbank.com/>

Eastern Bank HMDA Mortgage Information

2012

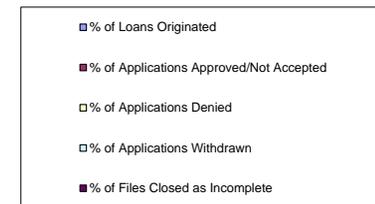
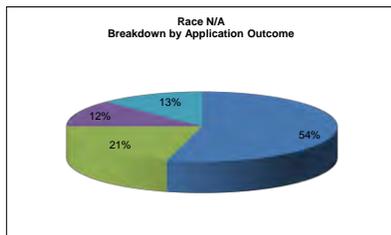
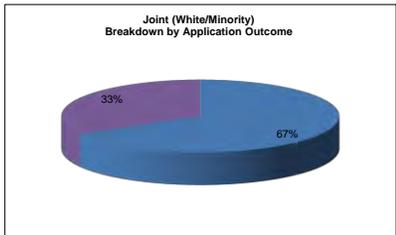
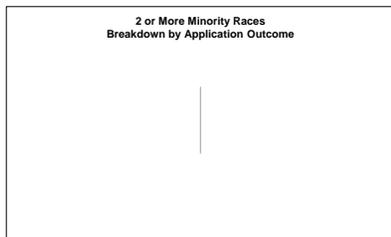
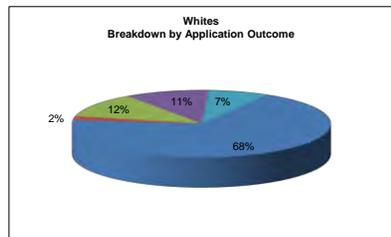
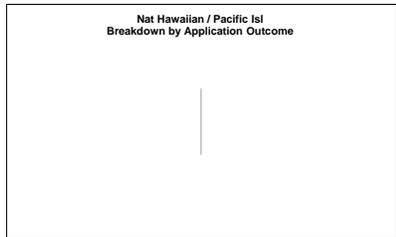
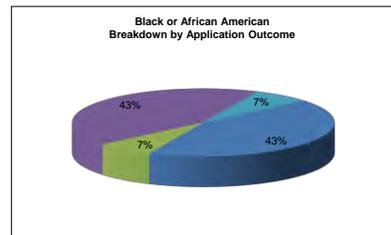
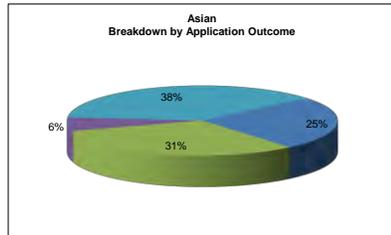
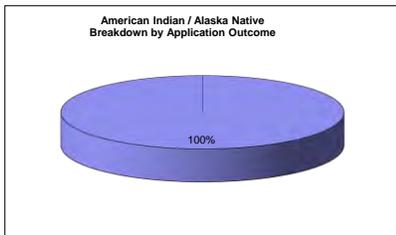
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	1	0%	1	100%	0	0%	0	0%	0	0%	0	0%
Asian	16	7%	4	25%	0	0%	5	31%	1	6%	6	38%
Black or African American	14	6%	6	43%	0	0%	1	7%	6	43%	1	7%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	161	74%	110	68%	3	2%	19	12%	17	11%	12	7%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	3	1%	2	67%	0	0%	0	0%	1	33%	0	0%
Race N/A	24	11%	13	54%	0	0%	5	21%	3	13%	3	13%
Total	219	100%	136	62%	3	1%	30	14%	28	13%	22	10%

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



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

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

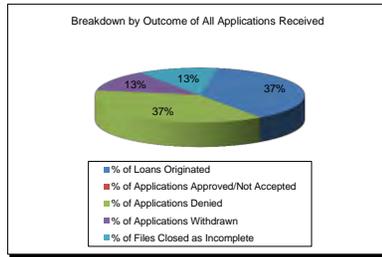
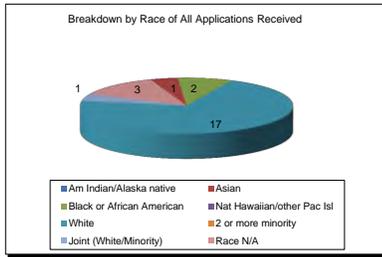


Eastern Bank Low-Income Mortgage Information

2012

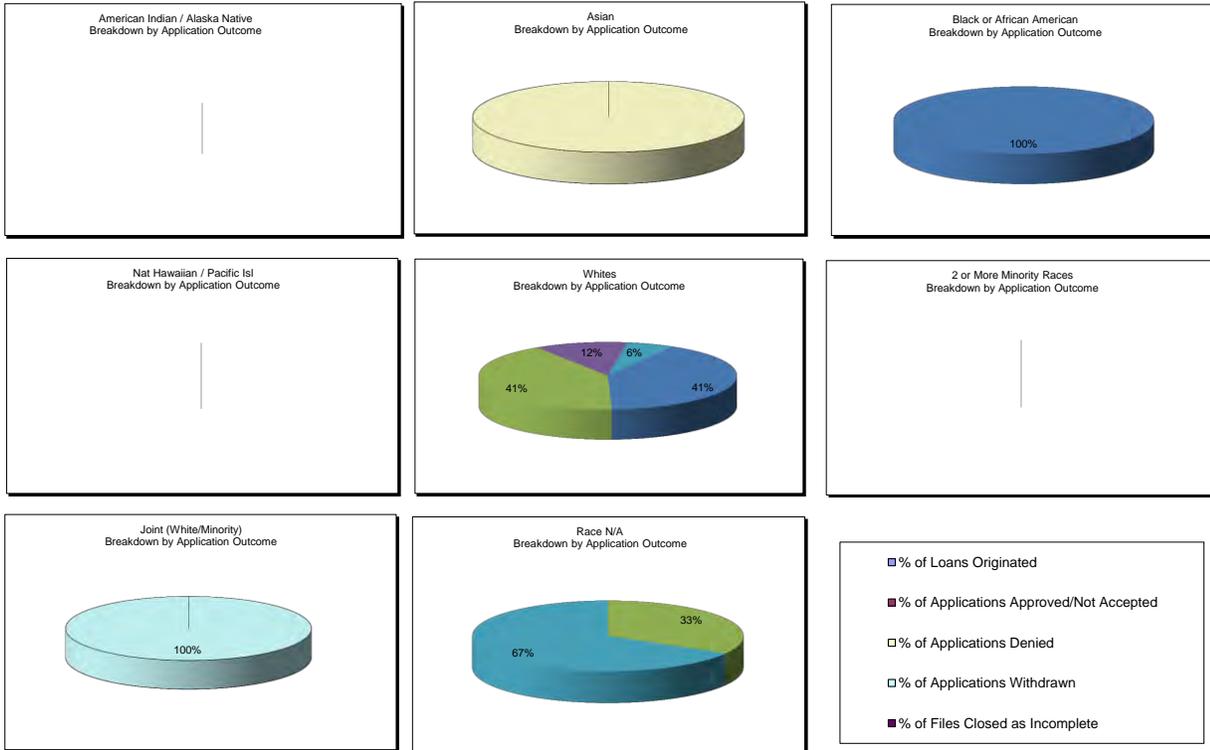
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	4%	0	0%	0	0%	1	100%	0	0%	0	0%
Black or African American	2	8%	2	100%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	17	71%	7	41%	0	0%	7	41%	2	12%	1	6%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	4%	0	0%	0	0%	0	0%	1	100%	0	0%
Race N/A	3	13%	0	0%	0	0%	1	33%	0	0%	2	67%
Total	24	100%	9	38%	0	0%	9	38%	3	13%	3	13%

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



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

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



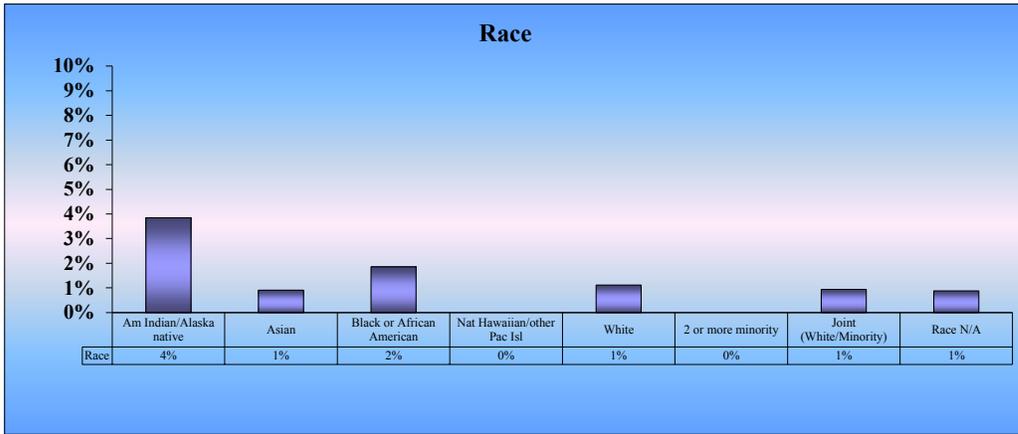
Compared against the MSA Aggregate Total

2012

Eastern Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	1	4%	1	9%	0	0%	0	0%	0	0%	0	0%
Asian	16	1%	4	0%	0	0%	5	2%	1	1%	6	14%
Black or African American	14	2%	6	1%	0	0%	1	1%	6	10%	1	3%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	161	1%	110	1%	3	1%	19	1%	17	1%	12	4%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	3	1%	2	1%	0	0%	0	0%	1	3%	0	0%
Race N/A	24	1%	13	1%	0	0%	5	2%	3	1%	3	4%
Total	219	1%	136	1%	3	0%	30	2%	28	1%	22	5%

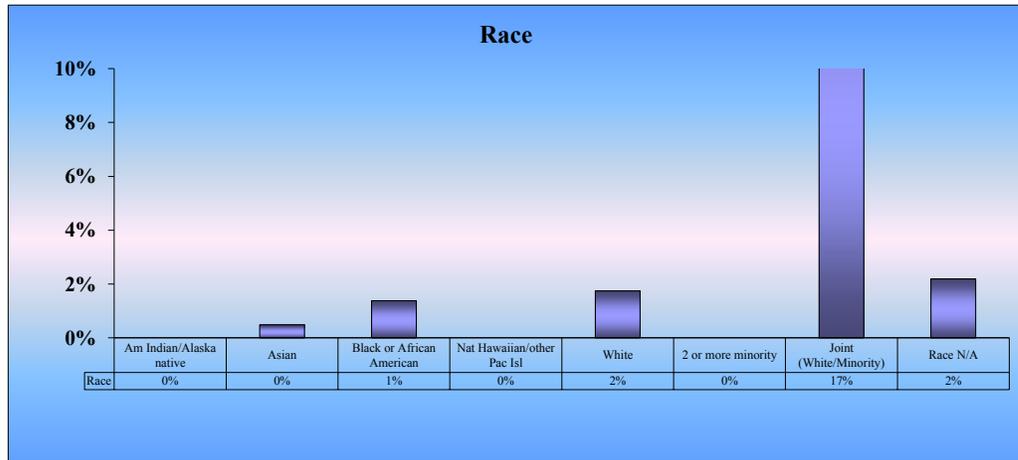
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Eastern Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	0%	0	0%	0	0%	1	3%	0	0%	0	0%
Black or African American	2	1%	2	2%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	17	2%	7	1%	0	0%	7	3%	2	2%	1	3%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	1	17%	0	0%	0	0%	0	0%	1	100%	0	0%
Race N/A	3	2%	0	0%	0	0%	1	3%	0	0%	2	25%
Total	24	2%	9	1%	0	0%	9	3%	3	2%	3	5%

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





First Trade Union Bank



First Trade Union Bank Overview

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

Chief Risk Officer

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

Description

First Trade Union Bank (FTUB) is an interstate federal stock savings bank headquartered in Boston, Massachusetts, with total assets of \$632 million. The New England Carpenters Pension Fund, the New England Carpenters Guaranteed Annuity Fund, and the Empire State Carpenters Pension Fund collectively hold 100 percent of the Bank’s stock.

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

In recent years, the bank has scaled back its operations; management used this as a strategic opportunity to focus on better serving the credit needs of customers in the Massachusetts and New York assessment areas.

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

Principal Officers

President & CEO

Michael A. Butler
 One Harbor Street, Suite 201
 Boston, MA 02210
 617-482-4000

CFO

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

Employees

Number of Employees	75 ²
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	2
Branches in Boston MSA	1
Number of ATMs	6
Number of Free-Standing ATMs	4

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2011

Overall Rating SATISFACTORY³

Overall rating, Massachusetts	SATISFACTORY
Lending Test Rating, Massachusetts	OUTSTANDING
Community Development Test Rating, Massachusetts	SATISFACTORY

¹ Based on most recent CRA Performance Evaluation by OCC published 2011.

² FDIC Institution Directory.

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



Discussion

First Trade Union Bank’s CRA performance was evaluated under the OCC Intermediate Small Savings Association Examination Procedures. This evaluation procedure includes a lending test and a community development test. The discussion below focuses on the ratings specifically pertaining to the bank’s Massachusetts activities.

Since the previous CRA examination, FTUB has improved its overall examination ratings from “Needs to Improve” to “Satisfactory,” both for its total performance rating, and for its Massachusetts rating.

**Overall rating, Massachusetts:
SATISFACTORY⁴**

Lending Test

**Lending Test Rating, Massachusetts:
OUTSTANDING⁵**

First Trade Union Bank’s performance under the lending test in Massachusetts is rated “Outstanding.” The bank’s distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes. The bank’s geographic distribution of loans reflects excellent dispersion in the low- and moderate-income census tracts, among both individuals and businesses.⁶

General Responsiveness to Credit Needs

FTUB’s level of lending, as reflected in its average net loan-to-deposit ratio, is more than reasonable given the size and financial condition of the institution, as well as the assessment areas’ credit needs and relevant competitive factors.

The bank’s net loan-to-deposit ratio, which includes purchased loans, averaged 92% during the period of the latest CRA review. FTUB’s loan-to-deposit ratio is slightly higher than the national peer bank median quarterly average of 88% over the same period.⁷ As of December

2012, the bank’s net loan-to-deposit ratio was 89%.⁸

Responsiveness to Low- and Moderate-Income Credit Needs

FTUB’s distribution of loans in the Boston MSA reflects excellent penetration among individuals of different income levels and businesses of different sizes. In Boston, the percentage of home purchase loans FTUB originated to low- and moderate-income families is greater than the percentage of low and moderate-income families residing in Boston.⁹

The bank’s performance is considered outstanding given the lack of affordable housing and high competition in the Boston MSA. Because Boston’s median housing prices remain high relative to median incomes, lack of affordable housing limits lending opportunities.

FTUB’s geographic distribution of loans also reflects excellent penetration among individuals and among businesses in the low and moderate-income census tracts. The proportion of home purchase loans originated in low-income census tracts significantly exceeds the percentage of owner-occupied housing in the low-income tracts. The same is true for the proportion of FTUB’s lending for home purchases, refinances, and home improvement loans in moderate-income tracts in Boston.

Given the low percentage of owner-occupied housing in Boston’s low-income geographies, FTUB’s overall loan dispersion is considered excellent.¹⁰

Community Development Test

**Community Development Test Rating,
Massachusetts: SATISFACTORY¹¹**

First Trade Union Bank’s performance under the community development test in Massachusetts is rated Satisfactory. FTUB’s community development performance demonstrates adequate responsiveness to community development needs

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

⁵ Ibid.

⁶ Ibid.

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

⁸ FDIC Institution Directory.

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

¹⁰ Ibid.

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



through community development loans, investments, and services.¹²

Community Development Lending

The bank’s level of community development lending is Satisfactory. FTUB extended one community development loan for \$600,000 in Massachusetts during the evaluation period 2009-2011. The loan funded the construction of a building to house qualified low-income community businesses and a nonprofit organization that seeks to increase affordable homeownership across Massachusetts.¹³

During the majority of the CRA evaluation period, the bank’s ability to make commercial loans was impacted by the terms of an agreement with its regulatory agency. This agreement precluded FTUB from underwriting new community development loans during the period.

Community Development Investments

FTUB made a satisfactory level of community development investments and donations. During the assessment period, the bank made \$3.7 million in investments: two community development investments, and 16 community development grants.¹⁴

Both of the bank’s two new community development investments provided low- and moderate-income mortgages in Massachusetts.

The bank made \$37,000 in qualified community development grants and donations during the assessment period 2009-2011. These benefited eight different community development organizations, five of which are located in Boston.

Community Development Services

The bank provides a satisfactory level of community development services. During the evaluation period, two bank officers provided financial expertise and leadership services to two qualified community development organizations serving the greater Boston area.¹⁵

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
One Harbor Street Boston, MA 02210	✓	✓
750 Dorchester Avenue Boston, MA 02125	✓	
One Design Center Place Boston, MA 02210	✓	
47 David G. Mugar Way Boston, MA 02114	✓	
88 Black Falcon Avenue Boston, MA 02210	✓	

FSB: Full Service Branch

FTUB’s free-standing ATMs at Design Center Place, David G. Mugar Way, and Black Falcon Avenue, are withdrawal-only ATMs.

Year-Over-Year at a Glance
HMDA And Low-Income Loans

First Trade Union Bank originated two HMDA-reportable loans in Boston in 2010 and in 2011 and one in 2012. The bank originated one low-income loan in 2010, but none in 2011 or in 2012.¹⁶

	2010	2011	2012
HMDA Applications Received	2	2	2
HMDA Loans Originated	2	2	1
Low-Income Applications Received	1	0	0
Low-Income Loans Originated	1	0	0

Small Business Loans

No 2012 HMDA-reportable small business loan data was available for First Trade Union Bank.¹⁷

Loan Information By Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹² Ibid.

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

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

¹⁵ Ibid.

¹⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

¹⁷ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; October 31, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

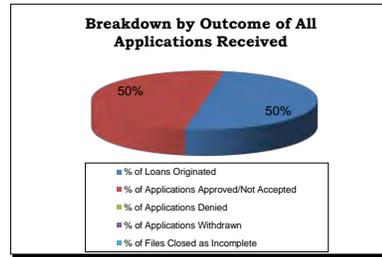
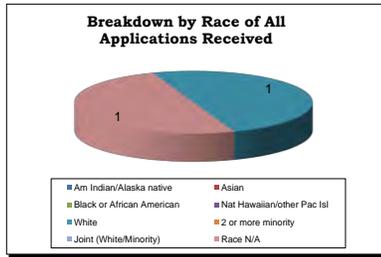
FDIC Institution Directory
<http://www2.fdic.gov/idasp/main.asp>

First Trade Union Bank website:
<http://www.ftub.com/>

First Trade Union Bank HMDA Mortgage Lending 2012

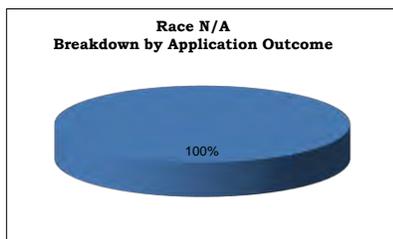
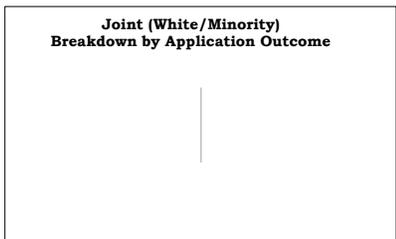
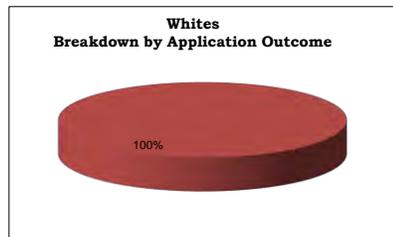
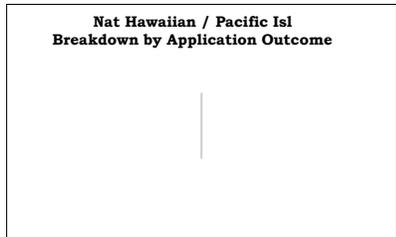
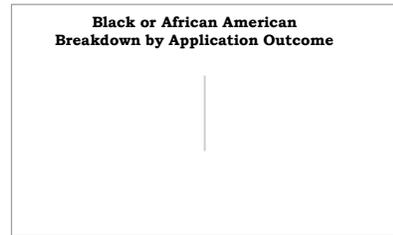
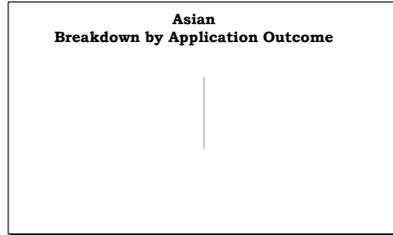
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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



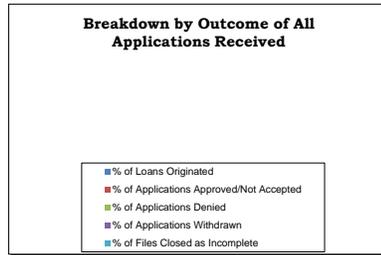
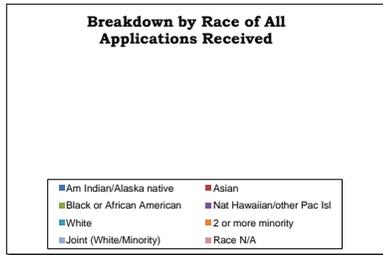
- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

First Trade Union Bank Low-Income Mortgage Lending

2012

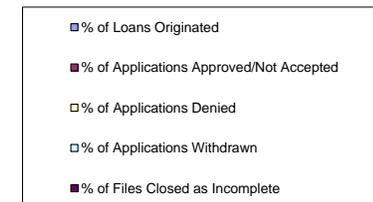
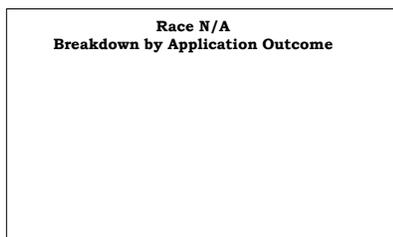
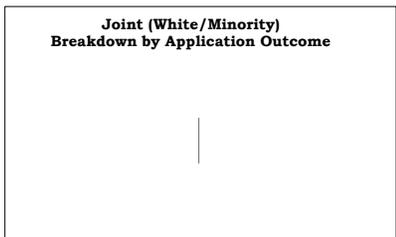
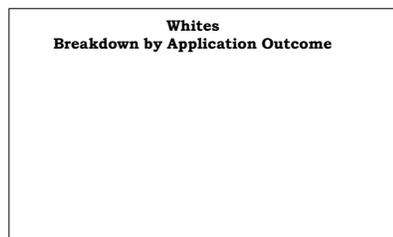
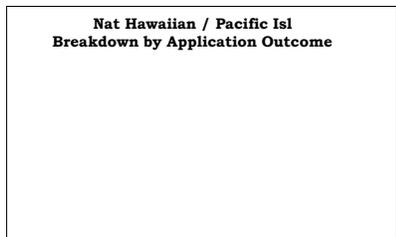
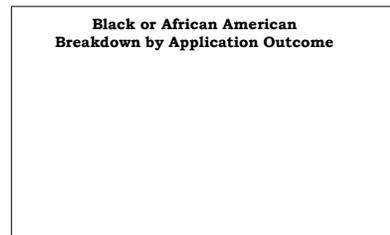
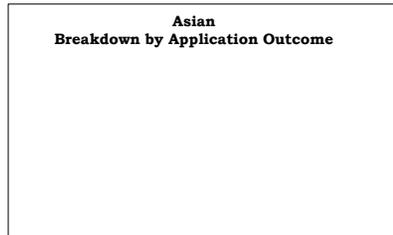
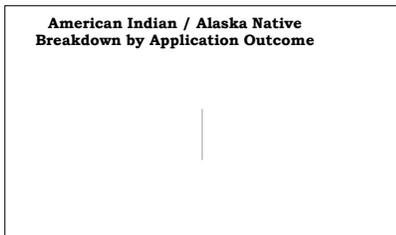
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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





JPMorgan Chase Bank



JPMorgan Chase Bank Overview

JPMorgan Chase Bank, N.A.
1111 Polaris Highway
Columbus, OH 43240

Description

JPMorgan Chase Bank, N.A. is a subsidiary of JPMorgan Chase & Co., a global financial services firm with assets of \$2.3 trillion and operations in more than 40 countries. The bank has nearly \$1.9 trillion in assets.

A component of the Dow Jones Industrial Average, JPMorgan Chase & Co. is one of the largest originators and servicers of home mortgages in the country. The bank has one of the largest branch networks in the United States, with over 5,500 branches and 18,000 ATMs . The bank’s retail network operates under the Chase brand.

The firm’s Retail Financial Services division provides a range of financial services to consumers and small businesses, though its retail presence in Massachusetts is minimal. The bank is the nation’s largest SBA lender.

No CRA information is reported about JPMorgan Chase Bank’s Massachusetts activities. The most recent review, conducted in 2011, did not evaluate the bank’s presence in Massachusetts. Ratings are provided for reference only.

Principal Officers

Chairman and CEO, JPMorgan Chase & Co.

Jamie Dimon
1111 Polaris Highway
Columbus, OH 43240
212-270-6000

CFO

Marianne Lake
1111 Polaris Highway
Columbus, OH 43240
212-270-6000

CFO

Marianne Lake
1111 Polaris Highway
Columbus, OH 43240
212-270-6000

Employees

Number of Employees	203,881 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	5614
Branches Within Boston MSA	0
Number of ATMs	18,699
Free-Standing ATMs in Boston	10

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2011
Overall Rating	SATISFACTORY²
Lending Test Rating	HIGH SATISFACTORY
Investment Test Rating	OUTSTANDING
Service Test Rating	HIGH SATISFACTORY

¹ FDIC Institution Directory.

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



Discussion

Overall rating: SATISFACTORY³

JPMorgan Chase Bank (JPMC Bank) received a CRA evaluation in January 2011. Massachusetts was not among in the bank’s CRA assessment areas, as the bank does not operate any branches in Massachusetts. Therefore, **the evaluation did not include any Boston information.** Ratings and information are included below **for reference only.**

Lending Test

Lending Test Rating: HIGH SATISFACTORY⁴

JPMC Bank’s lending performance is good. The bank’s volume of community development loans and the responsiveness of these loans to identified needs in the bank’s assessment areas were driving factors in elevating the bank’s otherwise adequate lending performance to a good level.⁵

General Responsiveness to Credit Needs

JPMC Bank’s overall level of lending activity is generally excellent. The bank’s volume of loans is generally excellent compared with its deposit market share in the communities where it operates. The volume of loans originated is reflective of the bank’s resources and capacity during the examination period.⁶

Responsiveness to Low- and Moderate-Income Credit Needs

JPMC Bank’s distribution of loans to geographies of different income levels is generally good, while the distribution of loans to borrowers of different income levels is considered generally adequate.⁷

Leadership in Community-Development Loans

During the assessment period 2008-2010, JPMC Bank made over \$9.7 billion in community development loans nationwide. Most (68%) of the bank’s community development loans provided needed affordable housing. Another

19% provided social services that assisted low- and moderate-income individuals, and 13% helped revitalize or stabilize low- or moderate-income geographies or provided economic development. These loans demonstrate a positive commitment to community development efforts throughout the nation.⁸

Investment Test

Investment Test Rating: OUTSTANDING⁹

JPMC Bank’s overall investment performance is excellent. The bank has made a good level of investment in its assessment areas, and an excellent volume of investments in statewide and regional areas. In total, JPMC Bank made over \$7.7 billion in community development investments and grants in the current and prior periods.¹⁰

The bank and its affiliates responded to affordable housing needs primarily through investments in Low-Income Housing Tax Credit (LIHTC) partnerships or funds investments or acting as an equity placement agent for other investors into the LIHTC market. The bank is a consistent, and frequently the top, investor in the LIHTC market in the nation. With these investments, the bank demonstrated excellent responsiveness to the identified community development needs of its communities, through investment vehicles that promote affordable housing for low- and moderate-income individuals.

Notably, the U.S. Department of the Treasury’s Community Development Financial Institutions Fund (CDFI Fund) awarded Chase \$500,000 for serving economically distressed communities across the nation. The bank was recognized in 2011 with the U.S. Department of the Treasury’s Bank Enterprise Award, which supports FDIC-insured financial institutions that are dedicated to financing and supporting community and economic development activities.¹¹

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

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

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

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

¹⁰ Ibid.

¹¹ Ibid.



Service Test

Service Test Rating: HIGH SATISFACTORY¹²

Description of Service-Delivery Systems

JPMC Bank’s branch network provides generally good accessibility to geographies and individuals of different income levels in the bank’s assessment areas. The bank’s record of opening and closing branch offices has improved the accessibility of its delivery systems, particularly in moderate-income geographies.

While branch hours vary by assessment area and within assessment areas, overall they do not vary in a way that inconveniences portions of the assessment areas, particularly low- and moderate-income geographies.¹³

Community Development Services

JPMC Bank’s level of community development services is good. The bank provides financial services education in low- and moderate-income area branches and schools to homebuyers and homeowners trying to preserve their homes. The bank maintains a significant number of ongoing relationships with organizations that work on affordable housing, education initiatives, small business development, and other community development goals.¹⁴

Branch Information

JPMC Bank has no branches in Boston or in Massachusetts. It operates ten free-standing ATM in Logan Airport.

Location	ATM	FSB
Logan Airport Terminal B Boston, MA 02128	✓	
Logan Airport Terminal A Boston, MA 02128	✓	
Logan Airport Terminal A Boston, MA 02128	✓	
Logan Airport Terminal E Boston, MA 02128	✓	
Logan Airport Terminal B Boston, MA 02128	✓	
Logan Airport Terminal C Boston, MA 02128	✓	
Logan Airport Terminal E Boston, MA 02128	✓	
Logan Airport Terminal B Boston, MA 02128	✓	

Logan Airport Terminal A
Boston, MA 02128
Logan Airport Terminal E ✓
Boston, MA 02128

Additional Information

In 2011, federal banking regulators identified certain deficiencies and unsafe and unsound practices in JPMC Bank’s residential mortgage servicing and the handling of foreclosure proceedings from 2008 through 2010. OCC regulators imposed formal criticism, censure, and financial penalties on the bank, and bank management signed a Consent Order in April 2011 agreeing to comply with specific requirements of the document.¹⁵

Also in 2011, the U.S. Department of the Treasury and the U.S. Department of Housing and Urban Development withheld incentive payments from Chase for its service in the Making Home Affordable Program for three consecutive quarters. The February 2012 Housing Scorecard noted “marked progress,” and the Treasury released previously withheld incentive payments.¹⁶

Review by the OCC of the bank’s foreclosure remediation programs (the Homeownership Preservation Office and the Chase Home Ownership Centers) found that these programs were not successful at effectively serving their communities or customers. The OCC found a “record of inadequate mortgage loan service and repetitive consumer complaints.”

The OCC also noted “substantive violations of section 5 of the Federal Trade Commission Act’s prohibitions regarding unfair and deceptive acts and practices.” JPMC Bank was fined \$2 million for these violations, and certain consumers who obtained the bank’s debt cancellation product were reimbursed.¹⁷

Year-Over-Year at a Glance

HMDA And Low-Income Loans

In 2012, JPMorgan Chase Bank originated its first HMDA-reportable loans in the Boston MSA since it established a presence in Massachusetts

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

¹³ Ibid.

¹⁴ Ibid.

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

¹⁶ Ibid.

¹⁷ Ibid.



in 2005.¹⁸ It originated 96 HMDA loans and 3 low-income loans.

	2010	2011	2012
HMDA Applications Received	0	0	144
HMDA Loans Originated	0	0	96
Low-Income Applications Received	0	0	8
Low-Income Loans Originated	0	0	3

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	0.4%	0.1%	0.2%
Moderate	0.3%	0.2%	0.2%
Middle	0.4%	0.3%	0.1%
Upper	0.3%	0.1%	0.1%
Total	0.4%	0.2%	0.2%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	0.3%	0.1%	0.2%
Moderate	0.4%	0.2%	0.2%
Middle	0.3%	0.4%	0.1%
Upper	0.2%	0.1%	0.1%
Total	0.3%	0.2%	0.2%

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for JPMorgan Chase Bank in the year 2012 is also compared to the 2012

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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

¹⁸ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; January 1, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

JPMorgan Chase & Co. Annual Report, 2011 and 2012.

JPMorgan Chase Corporate Responsibility Report, 2011.

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

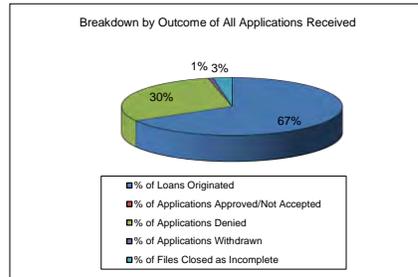
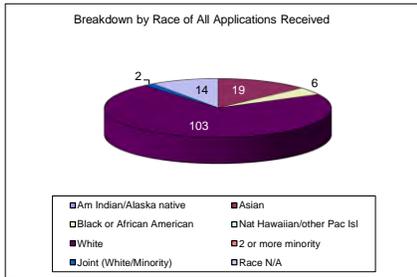
JPMorgan Chase Bank website
<http://www.jpmorganchase.com/>

JPMorgan Chase Bank HMDA Mortgage Information

2012

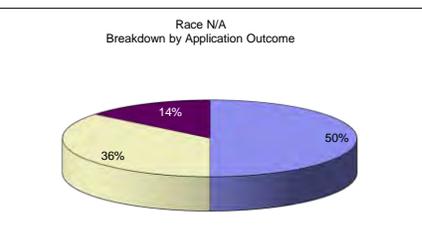
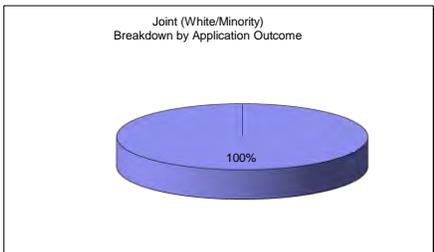
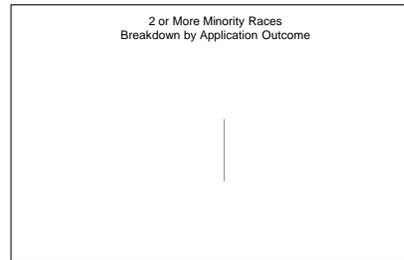
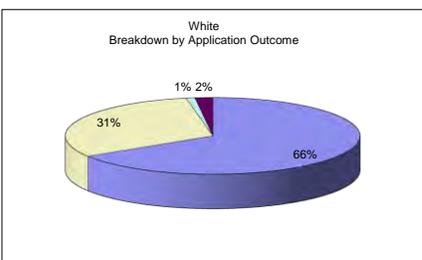
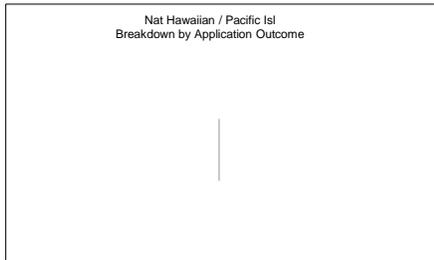
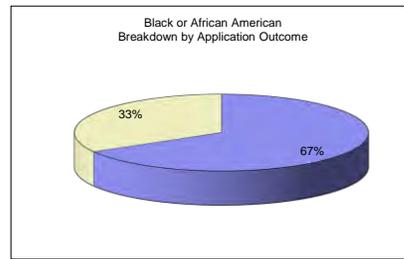
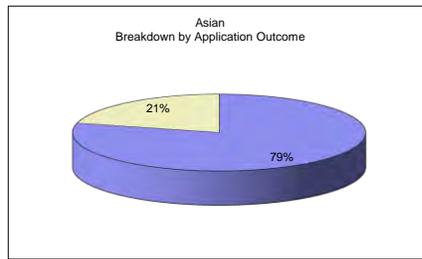
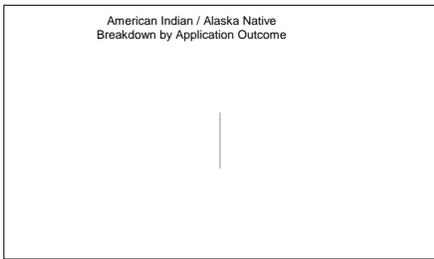
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	19	13%	15	79%	0	0%	4	21%	0	0%	0	0%
Black or African American	6	4%	4	67%	0	0%	2	33%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	103	72%	68	66%	0	0%	32	31%	1	1%	2	2%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	2	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	14	10%	7	50%	0	0%	5	36%	0	0%	2	14%
Total	144	100%	96	67%	0	0%	43	30%	1	1%	4	3%

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



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

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



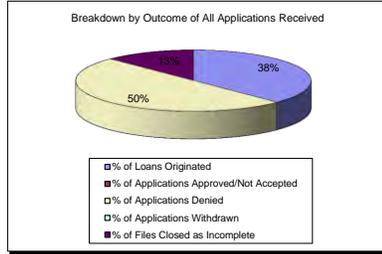
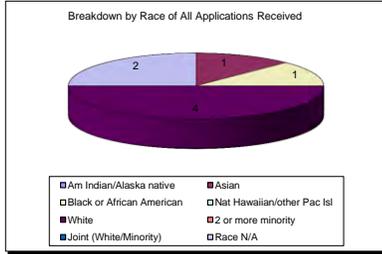
- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

JPMorgan Chase Bank Low-Income Mortgage Information

2012

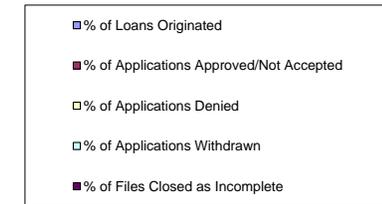
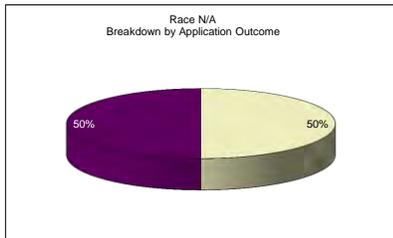
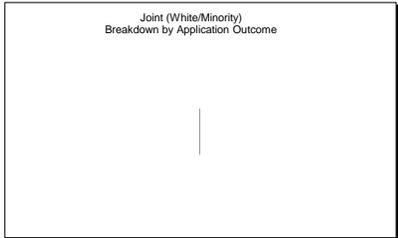
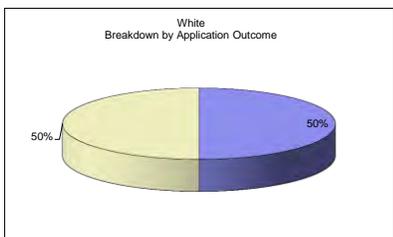
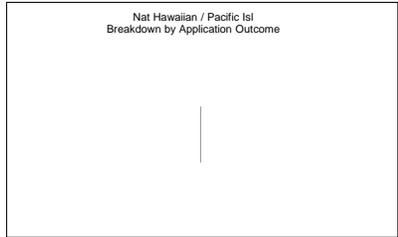
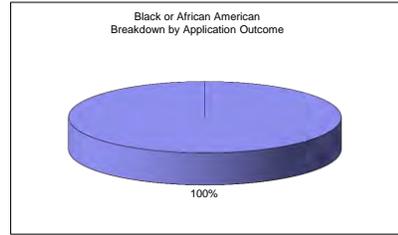
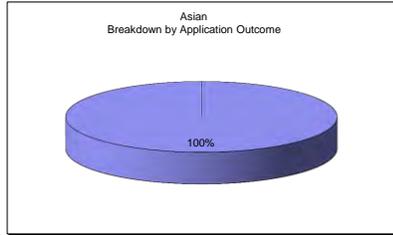
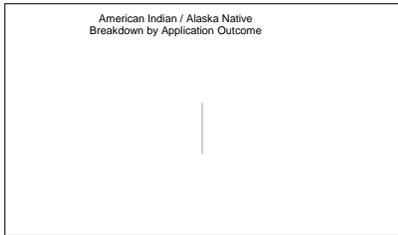
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	1	13%	1	100%	0	0%	0	0%	0	0%	0	0%
Black or African American	1	13%	0	0%	0	0%	1	100%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	4	50%	2	50%	0	0%	2	50%	0	0%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	25%	0	0%	0	0%	1	50%	0	0%	1	50%
Total	8	100%	3	38%	0	0%	4	50%	0	0%	1	13%

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



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

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



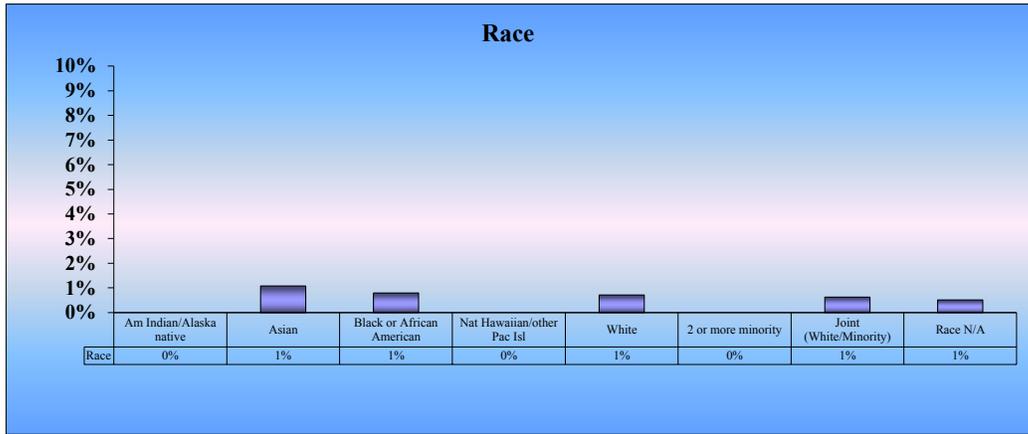
Compared against the MSA Aggregate Total

2012

JPMorgan Chase Bank, NA HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	19	1%	15	1%	0	0%	4	2%	0	0%	0	0%
Black or African American	6	1%	4	1%	0	0%	2	1%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	103	1%	68	1%	0	0%	32	2%	1	0%	2	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	2	1%	2	1%	0	0%	0	0%	0	0%	0	0%
Race N/A	14	1%	7	0%	0	0%	5	2%	0	0%	2	3%
Total	144	1%	96	1%	0	0%	43	2%	1	0%	4	1%

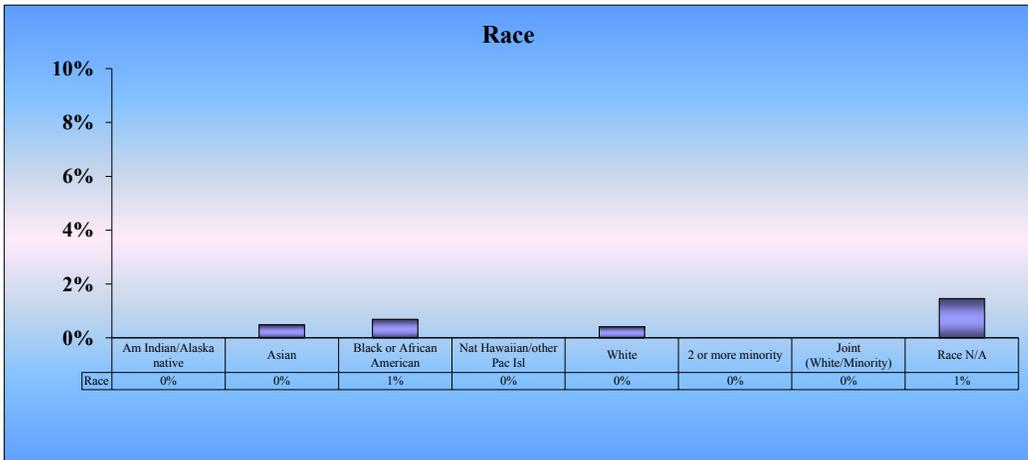
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



JPMorgan Chase Bank, NA Low-Income Mortgage Information

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

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







OneUnited Bank



OneUnited Overview

OneUnited Bank
 100 Franklin Street, Suite 600
 Boston, MA 02110

Description

OneUnited Bank is a minority-owned, commercially-chartered financial institution headquartered in Boston, Massachusetts. Its current asset size is \$601.8 million. OneUnited maintains two branches in Boston, one in Florida, and five in California.

The institution was created as the result of the consolidation of four minority-owned banks: Boston Bank of Commerce in Boston, Massachusetts; Peoples National Bank of Commerce in Miami, Florida; Founders National Bank in Los Angeles, California; and Family Savings Bank in Los Angeles, California.

OUB’s current business focus is primarily the origination of multifamily residential real estate loans (which make up 79 percent of the bank’s loans). The bank’s lending in Massachusetts and Florida has been extremely limited.

Principal Officers

Chairman & CEO

Kevin Cohee
 100 Franklin Street, Suite 600
 Boston, MA 02110
 617-457-4400

President

Teri Williams
 100 Franklin Street, Suite 600
 Boston, MA 02110
 617-457-4400

CFO

John Trotter
 100 Franklin Street, Suite 600
 Boston, MA 02110
 617-457-4400

Chief Lending Officer

Cecilia Isaac
 100 Franklin Street, Suite 600
 Boston, MA 02110
 617-457-4400

Employees

Number of Employees	97 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches – Total	8
Branches Within Boston MSA	2
Number of ATMs	0
Number of Free-Standing ATMs	0

CRA Rating for Massachusetts

Rating Agency	FDIC
Most Recent Rating	2010
Overall Rating	NEEDS TO IMPROVE ²
Lending Test Rating	SUBSTANTIAL NONCOMPLIANCE
Community Development Test Rating	NEEDS TO IMPROVE

¹ FDIC Institution Directory.

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



Discussion

Based on OneUnited Bank’s asset size, its CRA performance was evaluated using the Interagency Intermediate Small Institution Examination Procedures, which consist of a Lending Test and a Community Development Test.

The bank was assessed both on its overall performance, and on its California, Massachusetts, and Florida operations individually. The discussion below focuses on the bank’s Massachusetts ratings. In the bank’s Massachusetts and California assessment areas, it received a rating of “Needs to Improve”; in Florida, it was rated “Substantial Noncompliance.”³

The FDIC also reviewed OneUnited’s compliance with fair lending regulations, and identified multiple violations of the Federal Reserve Board’s Regulation B – Equal Credit Opportunity Act during the period under review.⁴

**Overall rating in Massachusetts:
NEEDS TO IMPROVE⁵**

Lending Test

**Lending Test Rating in Massachusetts:
SUBSTANTIAL NONCOMPLIANCE⁶**

General Responsiveness to Credit Needs

OneUnited’s lending activity in Massachusetts is considered very poor. The bank’s volume of lending was extremely low. No mitigating factors explain or justify the bank’s failure to meet the standards for a “Satisfactory” rating, particularly in Massachusetts, where the bank is headquartered.⁷

The bank originated only five home mortgage loans in Massachusetts during the entire CRA review period, with no loans at all originated in 2009.

In the Boston MSA, the bank has made only one HMDA-reportable home mortgage loan since

2006. The bank bade no HMDA-reportable home mortgage loans in Boston in 2011 or 2012.⁸

This level of lending is well below the standards of satisfactory performance given OneUnited’s asset size, business focus, branch structure, and the lending opportunities in Massachusetts.⁹ The limited resources that OneUnited devoted to loan production had a significant negative impact on the bank’s lending activity.¹⁰

OneUnited’s poor lending performance is considered especially egregious because the bank has been designated as a Community Development Financial Institution (CDFI) since July 1997. The CDFI program is a U.S. government-sponsored initiative created to expand the availability of credit, capital, and financial services in distressed urban and rural communities. The program provides financial assistance to institutions that serve these communities and low-income individuals.¹¹

Responsiveness to Low- and Moderate-Income Credit Needs

OneUnited Bank’s performance in meeting the needs of low- and moderate-income borrowers in Massachusetts was very poor due to the bank’s low volume of lending.¹²

Though the bank hired additional lending staff in 2010, there has been little effect on the Bank’s lending activity in Massachusetts.

In the Boston MSA, OneUnited Bank has made no low-income HMDA loans since 1998.¹³

Community Development Test

**Community Development Test Rating in
Massachusetts: NEEDS TO IMPROVE¹⁴**

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

⁴ Ibid.

⁵ Based on most recent CRA Performance Evaluation by FDIC published 2010.

⁶ Ibid.

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

⁸ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2011.

⁹ Ibid.

¹⁰ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹¹ Ibid.

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

¹³ FFIEC HMDA Aggregate & Disclosure Software Version 2.2, Board of the Governors of the Federal Reserve System; 2011.

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



OneUnited Bank’s overall community development performance demonstrates poor responsiveness to the community development needs of Massachusetts, considering the institution’s capacity and the need and availability of such opportunities in Massachusetts.¹⁵

Lending

OneUnited’s community development lending is considered poor based on the Bank’s size, resources, and the needs of the assessment areas.¹⁶

The only community development loan the bank made in Massachusetts during the review period (2007-2010) was a single \$600,000 community development loan that provided affordable rental housing.

This represents a significant decrease in the number of community development lending since the previous evaluation (2005-2007).

Investments

A review of the Bank’s qualified investments revealed a poor level of charitable contributions in Massachusetts. The bank made only \$15,350 in charitable contributions over the period 2007-2010. There were no additional equity investments or other qualified investments made in Massachusetts.¹⁷

Given the size of the institution and the fact that OneUnited is chartered in Massachusetts, the volume of qualified investments in Massachusetts is considered less than adequate.¹⁸

Service

The overall level of community development services provided by OneUnited is considered marginally adequate.¹⁹

Two of the bank’s full-service branch locations in Boston are in low-income census tracts. Neither offers an ATM.

Individual officers supported two community development organizations in Boston, as well as other national organizations. These individuals served in leadership roles at the organizations, including Board positions, and provided the organizations with their financial expertise and experience.

OneUnited is active in providing and supporting financial literacy initiatives in the area. During the review period, the bank made several presentations in Massachusetts discussing the availability of affordable real estate, financing, and FDIC insurance.

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
648 Warren Street Dorchester, MA 02121		✓
2343 Washington Street Roxbury, MA 02119		✓

FSB: Full Service Branch

The bank’s location at 100 Franklin Street, Boston, does not handle any cash transactions.

OneUnited does not own or operate any ATMs at any of its branches.

Special Note

In October 2008, the FDIC issued a cease-and-desist order to OneUnited Bank. According to the Order, the FDIC and the Massachusetts Division of Banks “determined that it had reason to believe that the Bank had engaged in unsafe or unsound banking practices and violations of law.”²⁰

Among other issues, regulators cited bank for “operating with an inadequate level of capital for the kind and quality of assets held,” “engaging in speculative investment practices,” “operating without an effective loan documentation program,” and “allowing the payment of excessive compensation, fees and benefits to its senior executive officers.”²¹

¹⁵ Ibid.

¹⁶ Based on most recent CRA Performance Evaluation by FDIC published 2010.

¹⁷ Ibid.

¹⁸ Ibid.

¹⁹ Based on most recent CRA Performance Evaluation by FDIC published 2010.

²⁰ Federal Deposit Insurance Corporation & The Commonwealth of Massachusetts Division of Banks to OneUnited Bank – Order To Cease And Desist; FDIC-08-294b; Issued October 27, 2008.

²¹ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

Between 2010 and 2012, OneUnited originated only one HMDA loan in the Boston MSA (in 2010).

OneUnited Bank has not originated any low-income HMDA loans in Boston since 1998.²²

	2010	2011	2012
HMDA Applications Received	3	2	4
HMDA Loans Originated	1	0	0
Low-Income Applications Received	1	2	1
Low-Income Loans Originated	0	0	0

Small Business Loans

No 2012 HMDA-reportable small business loan data was available for OneUnited Bank.²³

Loan Information by Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.

²² FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

²³ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Evaluation, Federal Deposit Insurance Corporation; October 4, 2010.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

Federal Deposit Insurance Corporation & The Commonwealth of Massachusetts Division of Banks to OneUnited Bank – Order To Cease And Desist; FDIC-08-294b; Issued October 27, 2008.

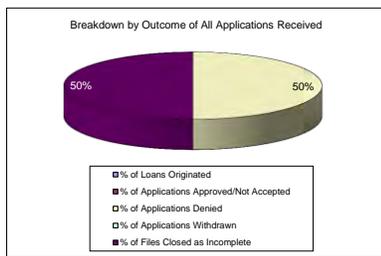
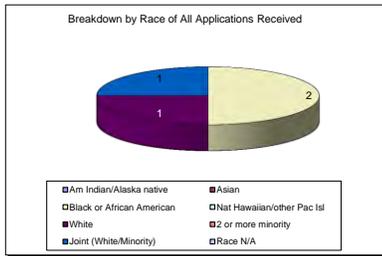
FDIC Information Directory:
<http://www2.fdic.gov/idasp/main.asp>

OneUnited website:
<http://www.oneunited.com/>

OneUnited Bank HMDA Mortgage Lending 2012

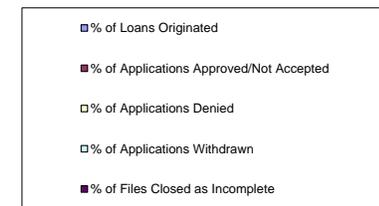
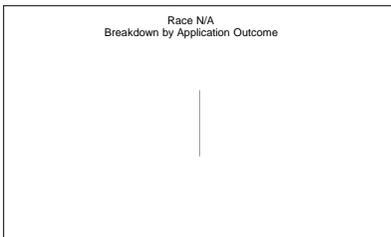
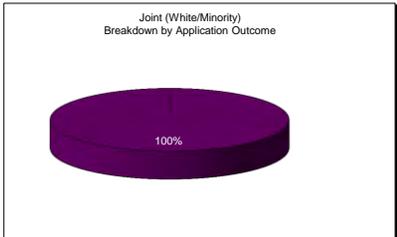
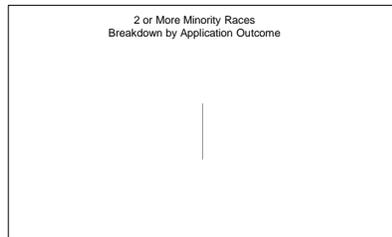
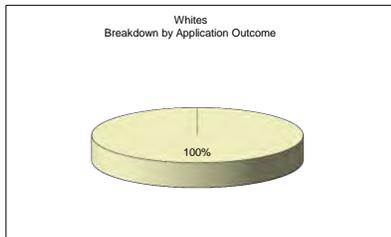
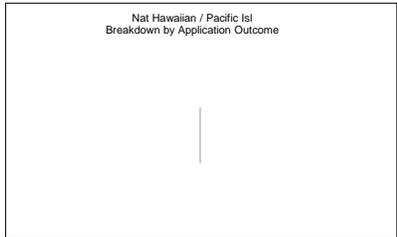
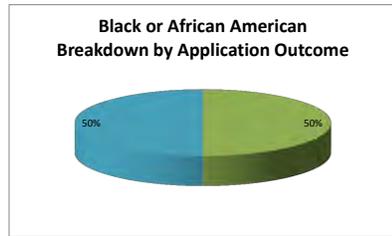
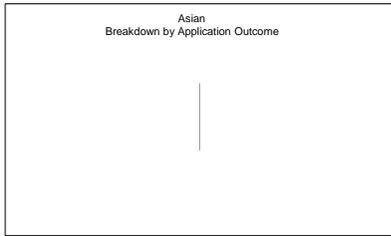
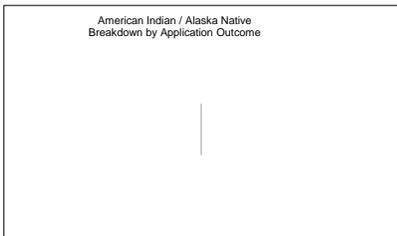
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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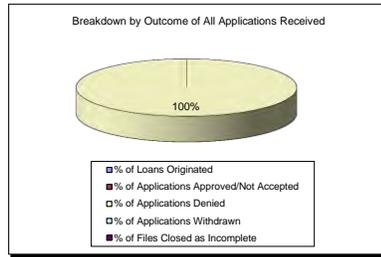
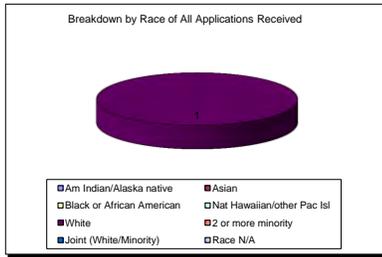
OneUnited Bank Low-Income Mortgage Lending

Note: No Data Reported For "Less Than 50% OF MSA/MD Median"

2012

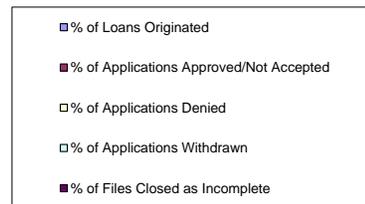
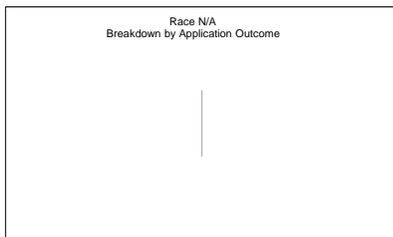
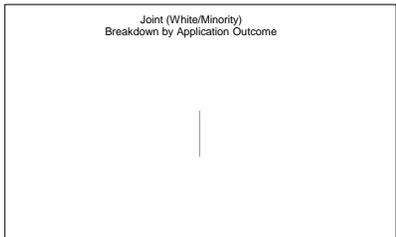
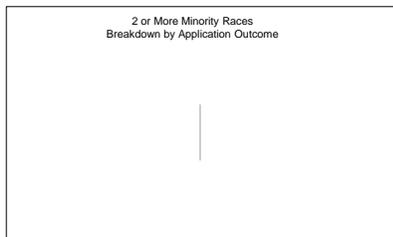
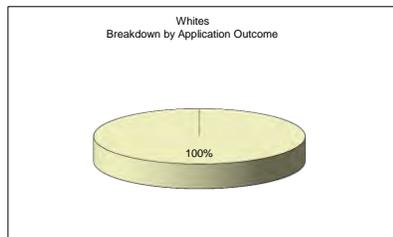
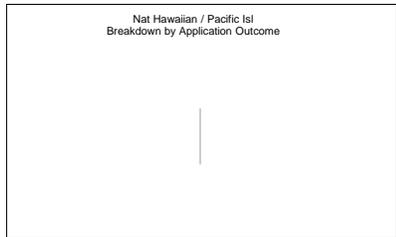
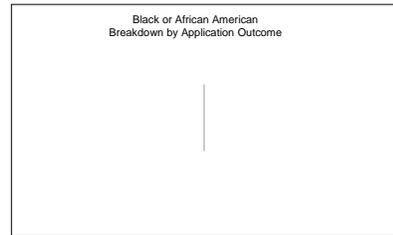
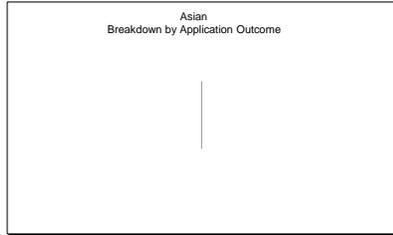
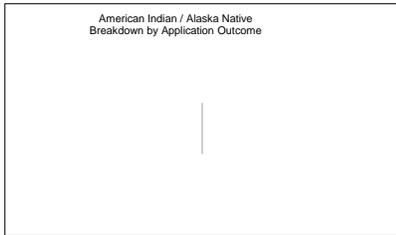
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of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

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



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

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







RBSCitizens Bank



RBS Citizens Bank Overview

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

Description

RBS Citizens Bank is a \$104.8 billion commercial bank headquartered in Providence, RI. It is owned by the Royal Bank of Scotland Group plc.

RBS Citizens is the 12th largest bank in the nation by assets, and the 9th largest by branches. The bank has 1400 branches, 3600 ATMs, and 19,000 employees in 12 states.

In Massachusetts, RBS Citizens Bank has a primary market focus on providing credit, deposit accounts, and services to individuals and small businesses. The bank has 253 branch offices and 744 ATMs in Massachusetts.

Principal Officers

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

CFO, Citizens Financial Group

John Fawcett
One Citizens Plaza
Providence, RI 02903
401-456-7096

President, Citizens Bank of Massachusetts

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

Employees

Number of Employees	15,490 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches in Massachusetts	253
Branches in Boston MSA	32
Number of ATMs in Massachusetts	744
Free-Standing ATMs in Massachusetts	491

CRA Rating

Rating Agency	OCC
Most Recent Rating	2010
Overall Rating for Boston MSA	OUTSTANDING ²
Lending Test Rating for Boston MSA	OUTSTANDING
Investment Test Rating for Boston MSA	HIGH
Service Test Rating for Boston MSA	SATISFACTORY
Service Test Rating for Boston MSA	OUTSTANDING

¹ FDIC Institution Directory.
² Based on most recent CRA Performance Evaluation published by OCC published 2010.



Discussion

**Overall rating for Boston MSA:
OUTSTANDING³**

The OCC evaluated both RBS Citizens Bank’s nationwide activities, and its specific performance in the Boston MSA.

The bank’s overall performance ratings were somewhat lower than its Boston MSA performance. For its nationwide activities, RBS Citizens Bank received a rating of “OUTSTANDING.” Its Lending Test was rated “OUTSTANDING,” while its Investment Test and Service Test were rated “HIGH SATISFACTORY.” **The discussion below focuses on the bank’s Boston MSA CRA ratings.**

Lending Test

**Lending Test Rating for Boston MSA:
OUTSTANDING⁴**

RBS Citizens Bank’s performance under the lending test in the Boston MSA is rated “Outstanding.” Based on full-scope reviews, the bank’s lending performance in Boston is excellent. The bank achieved an excellent distribution of geographic distribution of home loans, and good borrower distribution of home loans, across income levels.⁵

General Responsiveness to Credit Needs

RBS Citizens Bank’s overall level of lending activity in Boston is excellent, considering the strong competition for all types of loans in this marketplace. The bank was especially successful in originating small business loans and home mortgage loans when compared to its local bank competitors.⁶

RBS Citizens has historically been among the top SBA lenders in Massachusetts.⁷

Responsiveness to Low- and Moderate-Income Credit Needs

RBS Citizens Bank demonstrated excellent responsiveness to the credit needs of low- and moderate-income borrowers and geographies in the Boston MSA.

RBS Citizens Bank was ranked 6th in the Boston MSA in home mortgage loans to low-income borrowers, and 5th with respect to moderate-income borrowers. This performance is considered excellent given the bank’s strong competition from national mortgage companies that dominate Boston’s mortgage lending market. Considering only area bank competitors, RBSC ranked third in home mortgage lending to low-income borrowers, and second with respect to moderate-income borrowers.⁸

RBS Citizens Bank’s portion of home purchase loans in low- and moderate-income geographies significantly exceeded both the percentage of owner-occupied units and the bank’s overall market share. This was considered excellent performance.

RBS Citizens Bank’s borrower distribution for home purchase, home improvement, and refinance loans was also excellent. The portion of home purchase loans to low-income borrowers was significantly lower than the percentage of low-income families, but was considered adequate considering the percentage of households living below the poverty level and the high cost of housing in Boston. The portion of home purchase loans to moderate-income borrowers significantly exceeded both the percentage of moderate-income families and the bank’s overall market share.⁹

RBS Citizens Bank also achieved excellent geographic distribution of small loans to businesses in Boston.¹⁰

Leadership in Community Development

Loans

During the evaluation period 2008-2010, RBS Citizens Bank originated 10 qualified community development loans totaling \$20.8 million in the Boston MSA.¹¹

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

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

⁵ Ibid.

⁶ Ibid.

⁷ Small Business Association website.

⁸ Based on most recent CRA Performance Evaluation by OCC published 2010.

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.



Innovative and Flexible Lending Practices

RBS Citizens Bank offered a standard product mix of loans, including FHA loans and FNMA affordable housing loans. In addition, the bank offered several proprietary loan programs targeted to low- and moderate-income borrowers, which showed good product flexibility. These programs include its EZ Home Improvement Loan Program and a Winterization Loan Program in Massachusetts. The bank’s Portfolio FHA product and its Destination Home program offer more flexible underwriting to low- and moderate-income borrowers.¹²

Investment Test

Investment Test Rating for Boston MSA:
OUTSTANDING¹³

RBS Citizens Bank’s performance under the investment test in the Boston MSA is rated “High Satisfactory.” The bank’s performance in Boston is good, with a good level of community development investments, especially considering prior period investments and statewide investments.¹⁴

During the evaluation period 2008-2010, RBS Citizens Bank made five investments totaling \$5.18 million in the Boston assessment area. The bank also made 378 grants totaling \$4.53 million. In addition, 21 prior-period investments totaling \$40.78 million continued to benefit the assessment area.

RBS Citizens Bank exhibited a low level of complexity and was not innovative in its qualified investments. A substantial majority of the investments were associated with affordable housing for low- and moderate-income individuals, which showed excellent responsiveness to the main identified need in the area. Grants were associated with affordable housing, economic development, and community services for low- and moderate-income individuals.¹⁵

Service Test

Service Test Rating for Boston MSA:
OUTSTANDING¹⁶

RBS Citizens Bank’s performance under the service test in the Boston MSA is rated “Outstanding.” The bank’s performance in Boston is considered excellent.

Description of Service-Delivery Systems

RBS Citizens Bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in Boston. The distribution of service delivery systems is considered excellent.

Access to branches within low-income geographies was excellent and access to branches within moderate-income geographies was good as compared to the distribution of the population living in such geographies. In addition, the bank has a substantial number of branches in middle-income or upper-income geographies, but within one mile of a low- or moderate-income geography.

RBS Citizens Bank hours and services offered throughout the Boston AA were good. Services offered and hours are comparable among locations regardless of the income level of the geography. Differences in services are based only on branch type.

RBS Citizens Bank also offered a full range of alternative service delivery systems, including full-service ATMs and online and telephone banking.

Community Development Services

RBS Citizens Bank’s performance in providing CD services in Boston was good and had positive impact on the service test performance. Bank management was involved in community development programs that targeted low- and moderate-income individuals and geographies. Bank employees participate in community development organizations in Boston, and the bank provides training at seminars for either basic banking or home ownership.

¹² Ibid.

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

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶Based on most recent CRA Performance Evaluation by OCC published 2010.



Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1100 Massachusetts Avenue Dorchester, MA 02125-1606	✓	✓
1355 Washington Street Boston, MA 02118	✓	✓
1377 Hyde Park Avenue Hyde Park, MA 02136	✓	✓
1573 Blue Hill Avenue Mattapan, MA 02126	✓	✓
1628 Tremont Street Boston, MA 02120	✓	✓
1999 Centre Street West Roxbury, MA 02132	✓	✓
2000 Beacon Street Brighton, MA 02135	✓	✓
2343 Washington Street Roxbury, MA 02119	✓	✓
26 Central Square East Boston, MA 02128	✓	✓
28 State Street Boston, MA 02109	✓	✓
315 Hanover Street Boston, MA 02113	✓	✓
35 Washington Street Brighton, MA 02146	✓	✓
40 Summer Street Boston, MA 02110	✓	✓
414 Washington Street Brighton, MA 02135	✓	✓
426 Boylston Street Boston, MA 02116	✓	✓
435 Brookline Avenue Boston, MA 02215	✓	✓
441 West Broadway South Boston, MA 02127	✓	✓
5 Austin Street Charlestown, MA 02129	✓	✓
53 State Street Boston, MA 02109	✓	✓
560 Commonwealth Avenue Boston, MA 02215	✓	✓
569-571 Washington Street Dorchester, MA 02124	✓	✓
6 Ave De Lafayette Boston, MA 02111	✓	✓
60 Everett Street Allston, MA 02134	✓	✓
60 Newmarket Square Boston, MA 02118	✓	✓
607 Boylston Street Boston, MA 02116	✓	✓
696 Centre Street Jamaica Plain, MA 02130	✓	✓
73 Tremont Street Boston, MA 02108	✓	✓
77 Franklin Street (lobby) Boston, MA 02110-1519	✓	✓
771 Commonwealth Avenue	✓	✓

Boston, MA 02215		
777 South Street	✓	✓
Roslindale, MA 02131		
950 American Legion Highway	✓	✓
Roslindale, MA 02131		
One Financial Center	✓	✓
Boston, MA 02111		
FSB: Full Service Branch		

Year-Over-Year at a Glance

HMDA And Low-Income Loans

RBS Citizens’ HMDA lending has been consistent year over year for 2010 through 2012. The bank’s ratio of originations to applications has remained consistent, with roughly 64-67% of HMDA applications resulting in an origination.

The bank’s low-income lending has also remained stable over the same time period.¹⁷

	2010	2011	2012
HMDA Applications Received	832	849	750
HMDA Loans Originated	530	545	507
Low-Income Applications Received	132	97	132
Low-Income Loans Originated	72	63	72

¹⁷ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	6.1%	5.2%	4.0%
Moderate	5.7%	5.0%	4.7%
Middle	5.0%	4.3%	3.7%
Upper	4.4%	4.3%	3.9%
Total	5.3%	4.7%	4.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	8.2%	8.8%	4.8%
Moderate	8.9%	9.7%	7.5%
Middle	6.9%	5.5%	3.2%
Upper	8.2%	9.4%	5.5%
Total	8.0%	8.4%	5.4%

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans for details on small business loans. The small business loan activity for RBS Citizens Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract for details on loan information by census tract.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency; April 3, 2010.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

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

Citizens Financial Group Annual Report 2011 and 2012.

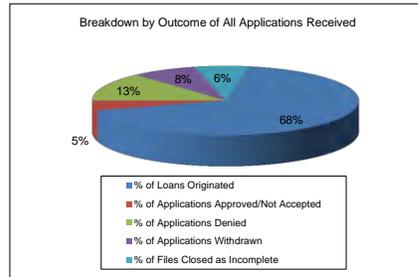
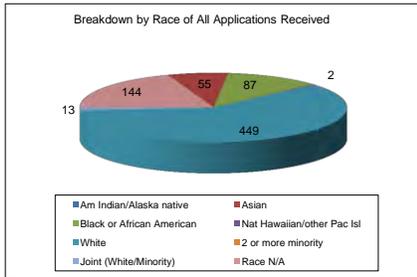
Citizens Bank website:
<http://www.citizensbank.com/>

RBSCitizens Bank HMDA Mortgage Information

2012

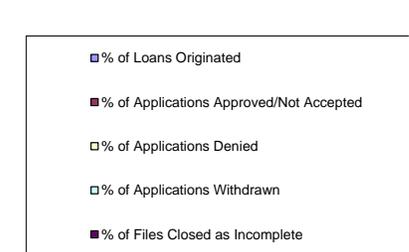
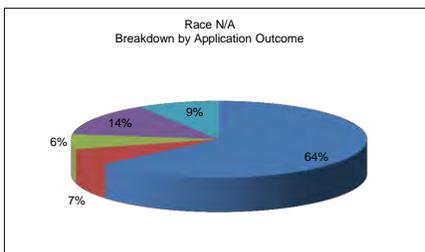
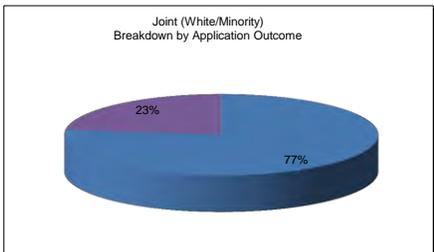
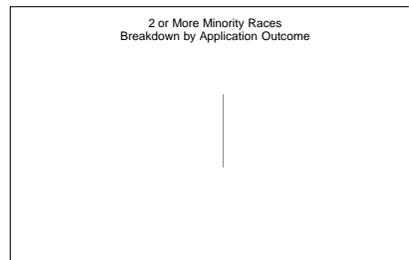
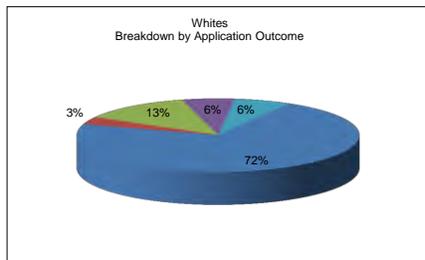
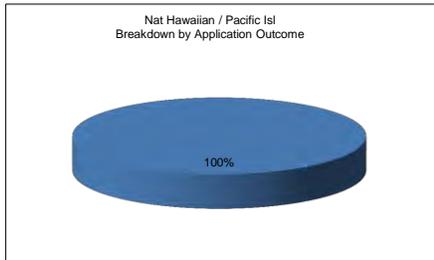
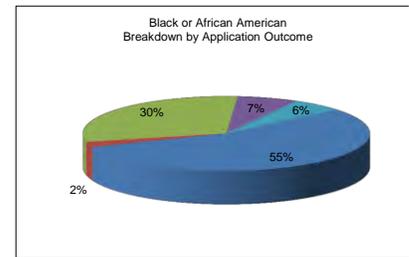
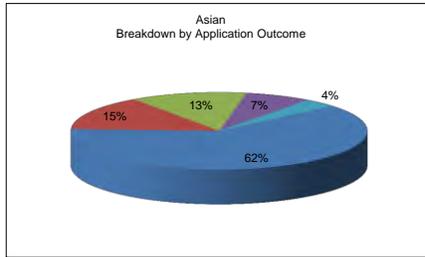
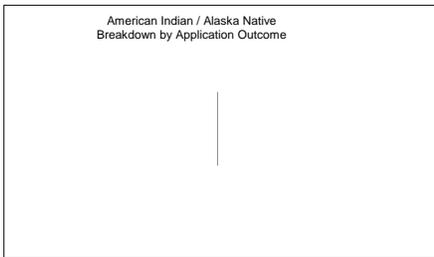
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	55	7%	34	62%	8	15%	7	13%	4	7%	2	4%
Black or African American	87	12%	48	55%	2	2%	26	30%	6	7%	5	6%
Nat Hawaiian/other Pac Isl	2	0%	2	100%	0	0%	0	0%	0	0%	0	0%
White	449	60%	321	71%	15	3%	57	13%	27	6%	29	6%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	13	2%	10	77%	0	0%	0	0%	3	23%	0	0%
Race N/A	144	19%	92	64%	10	7%	9	6%	20	14%	13	9%
Total	750	100%	507	68%	35	5%	99	13%	60	8%	49	7%

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



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

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

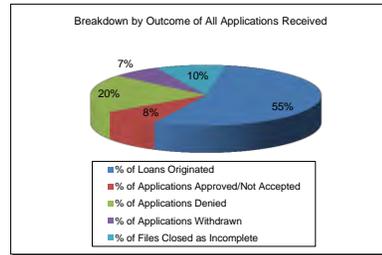
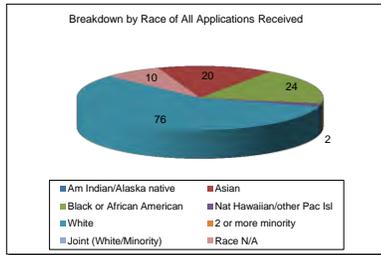


RBS Citizens Bank Low-Income Mortgage Information

2012

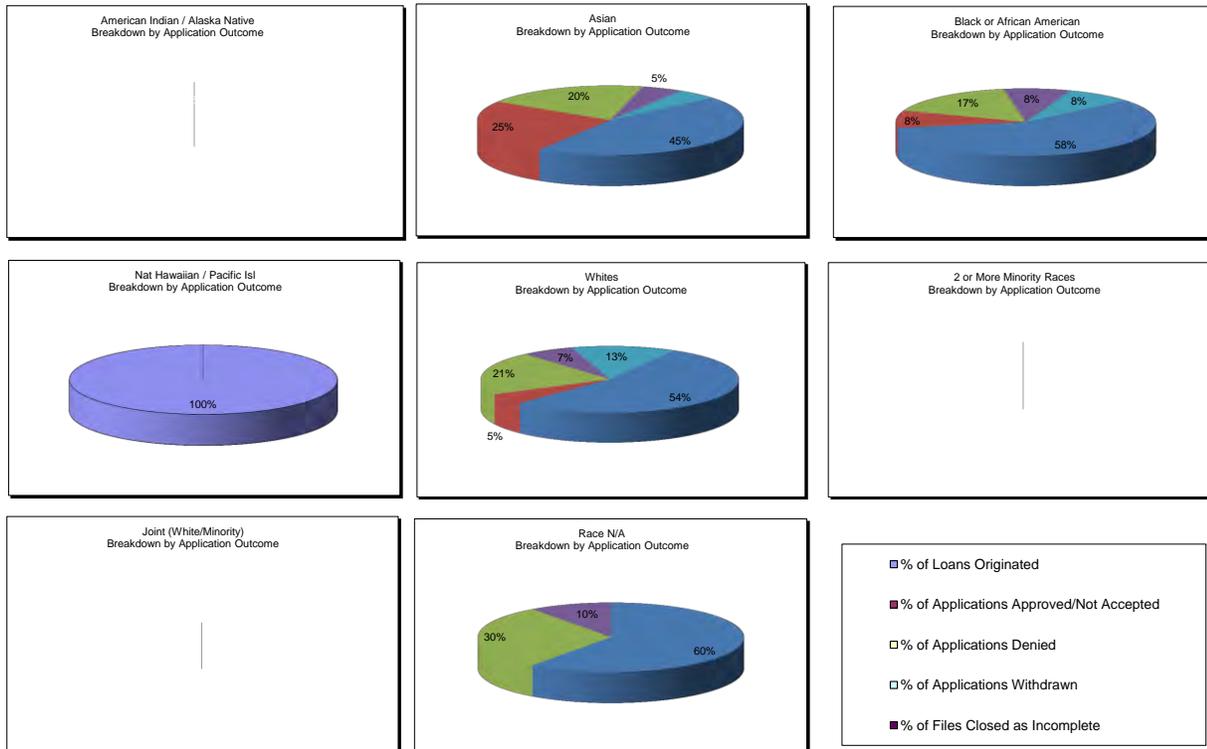
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	20	15%	9	45%	5	25%	4	20%	1	5%	1	5%
Black or African American	24	18%	14	58%	2	8%	4	17%	2	8%	2	8%
Nat Hawaiian/other Pac Isl	2	2%	2	100%	0	0%	0	0%	0	0%	0	0%
White	76	58%	41	54%	4	5%	16	21%	5	7%	10	13%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	10	8%	6	60%	0	0%	3	30%	1	10%	0	0%
Total	132	100%	72	55%	11	8%	27	20%	9	7%	13	10%

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



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

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





Sovereign Bank



Sovereign Bank Overview

Sovereign Bank
824 North Market Street, Suite 100
Wilmington, DE 19801

Description

Sovereign Bank is a \$83.1 billion federally chartered, stock savings bank headquartered in Wilmington, Delaware. Sovereign was acquired by Banco Santander, S.A. in January 2009. Banco Santander is the largest bank in the euro zone and among the largest in the world, with over \$77 billion in assets.

Sovereign Bank is one of the 25 largest banks in the United States, with principal markets in the northeast United States. The bank has 721 branches, 2,268 ATMs, 8,400 employees and 1.7 million customers. Sovereign offers an extensive array of financial products and services to individuals, businesses, government/municipalities and institutional entities. Many of the bank's loan products are designed to improve access to credit for low- and moderate-income borrowers.

Sovereign Bank's principal presence is in Connecticut, Delaware, Massachusetts, Maryland, New Hampshire, New Jersey, New York, Pennsylvania and Rhode Island. In 2011, the bank announced that it intends to move its corporate headquarters to Boston, and change its name to Santander Bank. In 2012, the bank converted from a thrift to a national bank.

Principal Officers

President & CEO, Sovereign Bancorp

Jorge Morán
824 North Market Street, Suite 100
Wilmington, DE 19801
267-256-8601

CFO

Kirk W. Walters
824 North Market Street, Suite 100
Wilmington, DE 19801
267-256-8601

CRA Community Development Managing Director

John V. Killen
824 North Market Street, Suite 100
Wilmington, DE 19801
267-256-8601

Employees

Number of Employees	8,415 ¹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	721
Branches in Boston	33
Number of ATMs	2,668
Number of Free-Standing ATMs	1,947

CRA Rating

Rating Agency	OTS
Most Recent Rating	2010
Overall Rating	OUTSTANDING²
Lending Test Rating	OUTSTANDING
Investment Test Rating	HIGH
Service Test Rating	SATISFACTORY
Service Test Rating	OUTSTANDING

¹ FDIC Institution Directory.

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



Discussion

Overall rating: OUTSTANDING³

Lending Test

Lending Test Rating: OUTSTANDING⁴

General Responsiveness to Credit Needs

Sovereign Bank's Lending Test rating is Outstanding. The bank extended a large volume of HMDA loans in its national footprint. Sovereign was ranked 8th in 2008 and 4th in 2009 in lending market share in the markets where the bank operates. Sovereign also extended a substantial volume of small business loans in its national assessment areas, despite competition from large commercial banks operating in many of the same markets. The bank was named a Massachusetts Small Business Association "preferred lender" in 2012.⁵

The Boston MSA received 40% of the bank's total HMDA lending 2008-2010, and 40% of Sovereign's small business lending over the same period. Sovereign was among the top mortgage originators in the Boston MSA during the period under review.

Responsiveness to Low- and Moderate-Income Credit Needs

Sovereign's overall lending to low- and moderate-income borrowers outperformed the aggregate by a substantial margin during the review period. Sovereign outperformed aggregate HMDA reporters in lending in low- and moderate-income geographies by a small margin in 2009 and 2010.

In small business lending, Sovereign outperformed the aggregate in lending to low- and moderate-income geographies by a substantial margin.⁶

In Boston, Sovereign Bank also showed solid penetration into the low- and moderate-income borrower market. During the review period, Sovereign's Boston MSA lending to both low- and moderate-income borrowers exceeded that of aggregate lenders by a good margin. In 2010, for example, the bank originated 5.5% of loans to low-income borrowers, and 17.2% to moderate-income borrowers.⁷

These positive results are partially attributable to the bank's extensive involvement in affordable mortgage products. Sovereign Bank is involved in most state housing agency programs, federal guaranteed/subsidized programs, and both internal and secondary market affordable mortgage programs.

For example, the bank provides technical assistance to sponsors of affordable housing projects in filing for grants from the Federal Home Loan Bank. In 2011, for example, Sovereign Bank administered 137 Affordable Housing Program projects and submitted three applications for \$750,000.⁸

Leadership in Community Development Loans

Sovereign Bank provides a high level of community development lending across the bank's national footprint. These loans provide or increase access to affordable housing for lower-income residents; services targeted to lower-income individuals and families; financing for small businesses; or economic development of distressed areas. In 2012, the bank provided a total of \$2.1 billion in community loans and investments, of which \$1.2 billion was allocated to affordable housing initiatives.⁹

Sovereign originated 297 community development loans providing over \$669.3 million in credit during the CRA review period, 2008-2010. This level of lending exceeded that of larger similarly situated banks. In Boston over the same period, the bank extended 49

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

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

⁵ Sovereign Bank CSR Report 2012.

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

⁷ Ibid.

⁸ Sovereign Bank Community Reinvestment Plan 2011-2013.

⁹ Sovereign Bank CSR Report 2012.



community development loans totaling \$86.6 million.

Sovereign's commitment to community development lending in Boston is strong. The Boston MSA is responsible for 40 percent of all Sovereign Bank's HMDA reportable lending, 40 percent of its reportable small business lending, and 36 percent of its branches.¹⁰

In 2012, Sovereign provided over \$50 million in commercial community development loans, \$129 million in multi-family lending and \$256 million in MECA (Modification, Extension, Consolidation Agreements) lending in low- and moderate-income census tracts.¹¹

Innovative and Flexible Lending Practices

Sovereign Bank has a solid record of lending under a variety of innovative and flexible lending products that target residents and businesses most in need. The bank developed a number of innovative/flexible products in response to specific needs in various markets.¹²

The bank partners with Massachusetts Housing Partnership's Soft Second program. In 2012, the bank received the Massachusetts Housing Partnership Home Safe Award as the top lender in the Soft Second first-time homebuyers program.

Sovereign participates in a number of other loan programs that primarily serve credit needs other than strictly residential mortgage or small business. In Boston, these programs include the Massachusetts Home Front Loan Program, which provides affordable loans to members of the National Guard and Reserves mobilized for active duty, and the Massachusetts Assistive Technology Loan Program, which provides low-cost loans to people with disabilities to buy assistive technology devices and services.¹⁴

Investment Test

Investment Test Rating:
HIGH SATISFACTORY¹⁵

Sovereign's Investment Test rating is High Satisfactory for its national activities, and Outstanding for its Boston MSA community development investment activities. In Boston, Sovereign Bank originated a high level of community development loans during the review period, and has an exemplary record of lending under various innovative and flexible lending products that target residents and businesses most in need.¹⁶

During the period 2008-2010, Sovereign Bank extended \$65.4 million nation-wide in qualified traditional community-development investments (low income housing tax credits and new markets tax credits). Of this \$65.4 million, \$22.5 million or 35% was directly allocated to the Boston MSA. The dollar level of traditional community-development activity compares favorably to Sovereign's peers, and the nature of the traditional investments reflects a strong commitment to qualified community development investments in Boston.¹⁷

Community Development Grants and Donations

Sovereign Bank extended a substantial level of charitable donations for community development qualified activities. Qualified community-development donations totaled approximately \$7.5 million in 2009-2010.

The bank's level of qualified community development activities in Massachusetts, however, was lower than expected, based on the distribution of overall lending levels and branch presence in the state.¹⁸

Contributions to qualified organizations in the Boston MSA totaled \$2.1 million over 2008-2010, or 15.2 percent of the bank's total national

¹⁰ Ibid.

¹¹ Sovereign bank CSR Report 2012.

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

¹³ Sovereign Bank CSR Rerport 2012.

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

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

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ Based on most recent CRA Performance Evaluation by OTS published 2010.



contributions. This allocation of contributions reflects a reasonable effort in the Boston MSA. The recipients of these donations support a broad range of community development services including affordable housing development, residential facilities for low-income physically-challenged residents, food pantries, homeless services, and homeownership counseling.¹⁹

In Boston, Sovereign’s Community Development Contributions included donations to:

- Massachusetts Affordable Housing Alliance
- Neighborhood of Affordable Housing
- Urban Edge
- Habitat for Humanity
- Allston Brighton CDC
- Fenway CDC
- Massachusetts Housing Partnership

In 2012, the bank provided over \$2 million in charitable grants to organizations nationwide to promote community development, education, and health and human services.²⁰

In 2012, the bank was named one of the top 100 charitable contributors in Massachusetts by the Boston Business Journal.²¹

Service Test

Service Test Rating: OUTSTANDING²²

Sovereign Bank’s Service Test rating is Outstanding.

Retail Services

Sovereign provides a broad range of traditional thrift deposit services and loan products targeted to consumers, businesses, and municipalities throughout its branch delivery system. A full menu of checking, savings, certificates of deposit, and retirement accounts are available throughout the Boston MSA through the bank’s

extensive branch network and alternative access methods.²³

Banking offices feature various customer conveniences, including Saturday hours, speech recognition ATMs, drive-up and walk-up windows, and night depositories. The services offered at each branch are generally consistent and do not vary in a way that would be inconvenient to residents of the assessment area. Alternate service and product delivery systems include online banking, bank-by-mail, and telephone banking.

In 2012, Sovereign upgraded all its ATMs to full compliance with the Americans with Disabilities Act.²⁴

Community Development Services

Sovereign Bank displayed strong performance in providing community development services in the Boston MSA. Sovereign Bank is actively involved with a number of community-development activities. These include assisting organizations involved in providing community services to low- and moderate-income individuals, affordable housing, and economic development of lower-income areas.²⁵

During the review period, the bank displayed its responsiveness to community development needs by providing financial and technical assistance to development organizations in Boston. Sovereign has partnered with local organizations to focus on educational programs to improve financial literacy. The qualified community-development activities in which the bank participated include:

- The Earned Income Tax Credit program, providing tax and budgeting help to lower-income individuals
- Interest on Lawyers’ Trust Accounts program, providing legal assistance to needy individuals
- IDA and FSA accounts, designed to help lower-income individuals meet savings goals

The overall level of commitment shown by the bank in support of community-development

¹⁹ Sovereign Bank CSR Report 2012.

²⁰ Sovereign Bank CSR Report 2012.

²¹ Sovereign Bank CSR Report 2012.

²² Based on most recent CRA Performance Evaluation by OTS published 2010.

²³ Ibid.

²⁴ Sovereign Bank CSR Report 2012.

²⁵ Based on most recent CRA Performance Evaluation by OTS published 2010.



activities by employee and officer involvement is excellent.²⁶ In 2012, Sovereign employees contributed more than 9,000 volunteer hours to community service agencies and organizations.²⁷

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1 Beacon Street Boston, MA 02108	✓	✓
75 State Street Boston, MA 02109	✓	1. ✓
30 Winter Street Boston, MA 02108	✓	✓
75-101 Federal Street Boston, MA 02110	✓	✓
125 Summer Street Boston, MA 02110	✓	✓
100 Oliver Street Boston, MA 02110	✓	✓
287 Hanover Street Boston, MA 02113	✓	✓
61 Harrison Avenue Boston, MA 02111	✓	✓
125 Causeway Street Boston, MA 02114	✓	✓
67 Beacon Street Boston, MA 02108	✓	✓
43 Kneeland Street Boston, MA 02111	✓	✓
61 Arlington Street Boston, MA 02116	✓	✓
575 Boylston Street Boston, MA 02116	✓	✓
200 Seaport Boulevard Boston, MA 02210	✓	✓
521 Tremont Street Boston, MA 02116	✓	✓
800 Boylston Street Boston, MA 02199	✓	✓
2 Meridian Street East Boston, MA 02128	✓	✓
279 Massachusetts Avenue Boston, MA 02115	✓	✓
437 Rutherford Avenue Boston, MA 02129	✓	✓
474 West Broadway South Boston, MA 02127	✓	✓
552 Commonwealth Avenue	✓	✓

Boston, MA 02215	✓	✓
2 Morrissey Boulevard Dorchester, MA 02125	✓	✓
6 Francis Street Boston, MA 02115	✓	✓
585 Columbia Road Dorchester, MA 02125	✓	✓
330 Martin Luther King Blvd., Suite 45 Roxbury, MA 02119	✓	✓
3060 Washington Street Boston, MA 02119	✓	✓
1442 Dorchester Avenue Dorchester, MA 02122	✓	✓
30 Birmingham Parkway Brighton, MA 02135	✓	✓
415 Market Street Brighton, MA 02135	✓	✓
780 Gallivan Boulevard Dorchester, MA 02122	✓	✓
1617 Blue Hill Avenue Mattapan, MA 02126	✓	✓
1850 Centre Street West Roxbury, MA 02132	✓	✓
860 River Street Boston, MA 02136	✓	✓

FSB: Full Service Branch

²⁶ Ibid.

²⁷ Sovereign Bank CSR Report 2012.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

After a significant decline from 2010 to 2011, Sovereign Bank’s HMDA applications and originations both increased to exceed 2010 levels in 2012.

During the reviewed period, the bank’s low-income lending dramatically increased. From 2010 to 2012, the number of low-income applications received more than doubled. The number of low-income loans originated more than tripled.²⁸

	2010	2011	2012
HMDA Applications Received	605	447	736
HMDA Loans Originated	446	330	560
Low-Income Applications Received	53	56	112
Low-Income Loans Originated	26	28	85

Small Business Loans

No 2012 HMDA-reportable small business loan data was available for Sovereign Bank.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

²⁸ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of Thrift Supervision; September 28, 2010.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

Banco Santander Annual Report 2012.

Sovereign Bank Corporate Social Responsibility Report 2012.

Sovereign Bank Community Reinvestment Plan 2011-2013.

FDIC Institution Directory:
<http://www2.fdic.gov/idasp>

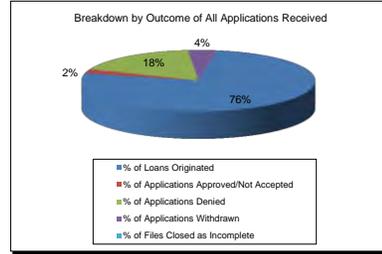
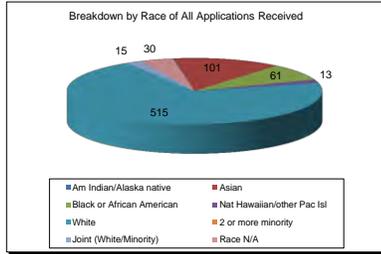
Sovereign Bank website:
<http://www.sovereignbank.com/>

Sovereign Bank HMDA Mortgage Information

2012

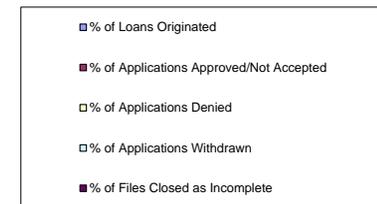
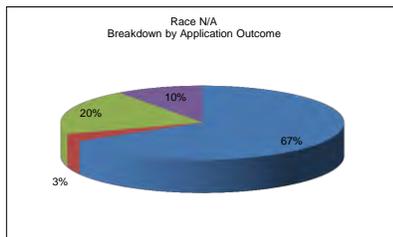
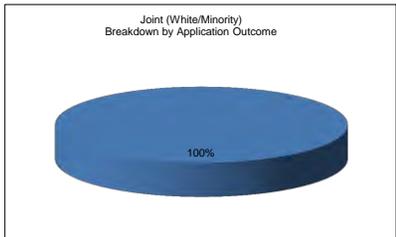
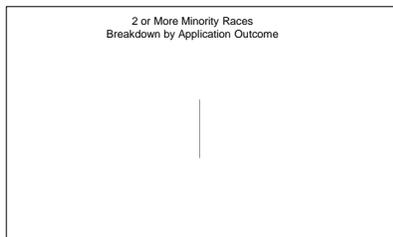
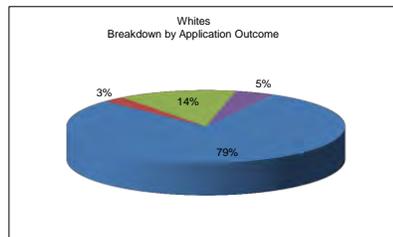
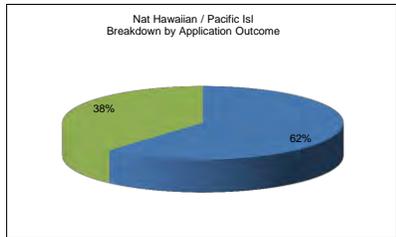
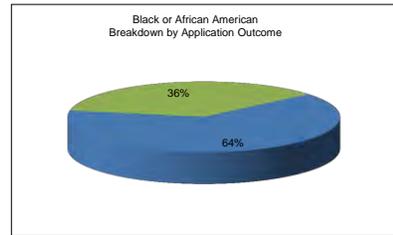
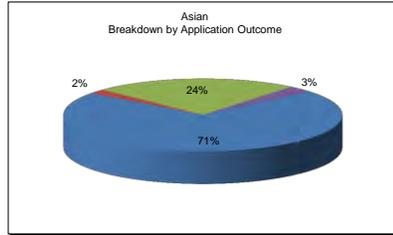
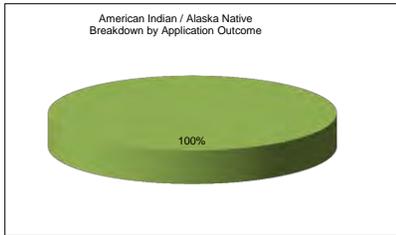
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	1	0%	0	0%	0	0%	1	100%	0	0%	0	0%
Asian	101	14%	72	71%	2	2%	24	24%	3	3%	0	0%
Black or African American	61	8%	39	64%	0	0%	22	36%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	13	2%	8	62%	0	0%	5	38%	0	0%	0	0%
White	515	70%	406	79%	13	3%	71	14%	24	5%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	15	2%	15	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	30	4%	20	67%	1	3%	6	20%	3	10%	0	0%
Total	736	100%	560	76%	16	2%	129	18%	30	4%	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 applications received, those originated are highlighted in blue, those not accepted are in red, etc.

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

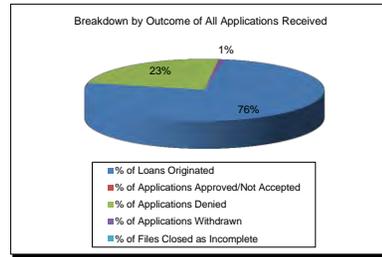
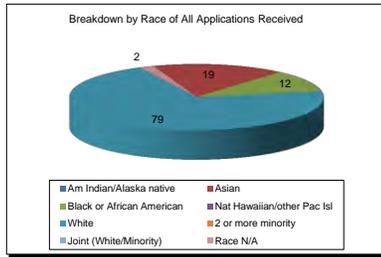


Sovereign Bank Low-Income Mortgage Information

2012

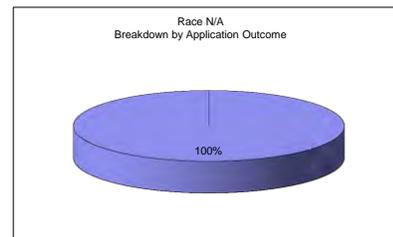
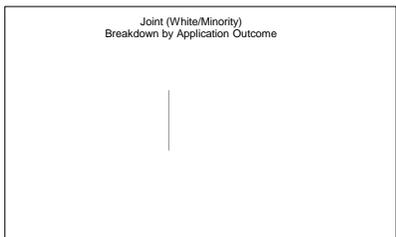
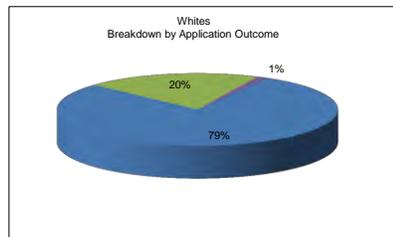
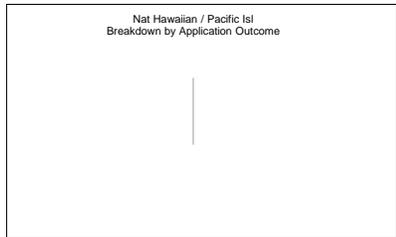
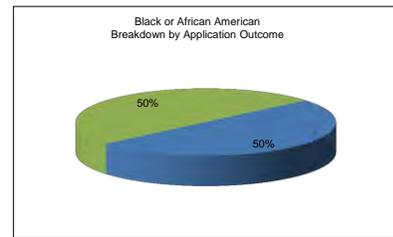
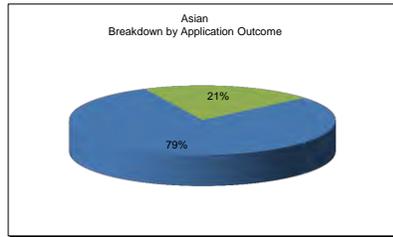
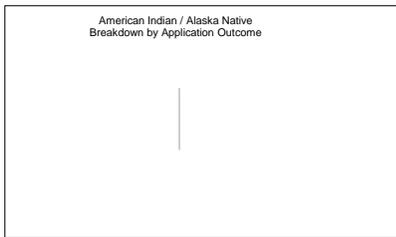
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	19	17%	15	79%	0	0%	4	21%	0	0%	0	0%
Black or African American	12	11%	6	50%	0	0%	6	50%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	79	71%	62	78%	0	0%	16	20%	1	1%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	2%	2	100%	0	0%	0	0%	0	0%	0	0%
Total	112	100%	85	76%	0	0%	26	23%	1	1%	0	0%

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



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

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



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

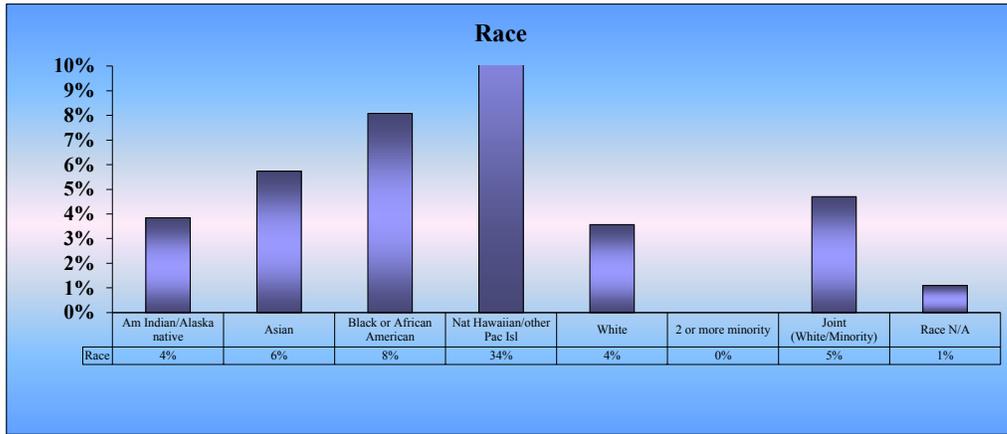
Compared against the MSA Aggregate Total

2012

Sovereign Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	1	4%	0	0%	0	0%	1	20%	0	0%	0	0%
Asian	101	6%	72	6%	2	3%	24	11%	3	2%	0	0%
Black or African American	61	8%	39	9%	0	0%	22	12%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	13	34%	8	32%	0	0%	5	63%	0	0%	0	0%
White	515	4%	406	4%	13	3%	71	5%	24	2%	1	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	15	5%	15	6%	0	0%	0	0%	0	0%	0	0%
Race N/A	30	1%	20	1%	1	1%	6	3%	3	1%	0	0%
Total	736	4%	560	4%	16	2%	129	7%	30	2%	1	0%

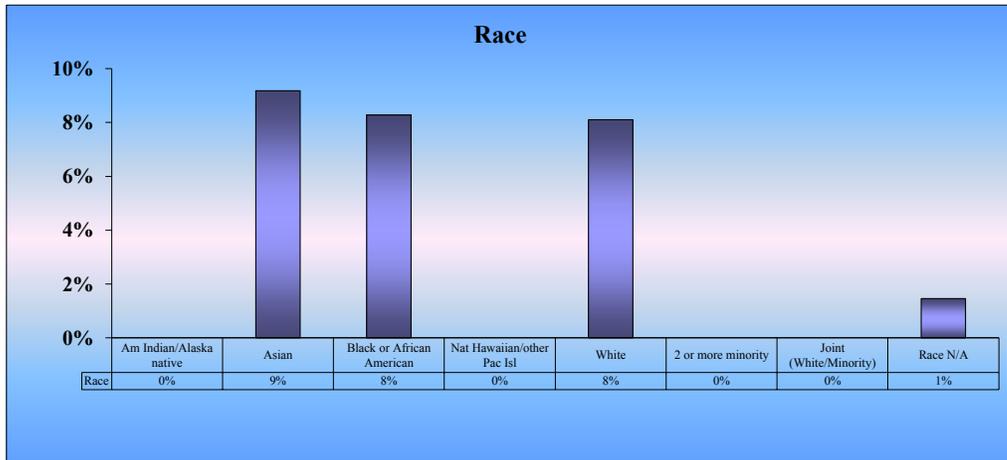
The chart below is the breakdown by race of the applications received at the bank compared against the MSA total. For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.



Sovereign Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	19	9%	15	10%	0	0%	4	12%	0	0%	0	0%
Black or African American	12	8%	6	7%	0	0%	6	14%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	79	8%	62	10%	0	0%	16	8%	1	1%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	1%	2	3%	0	0%	0	0%	0	0%	0	0%
Total	112	8%	85	9%	0	0%	26	8%	1	1%	0	0%

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







TD Bank



Bank

America's Most Convenient Bank®

TD Bank Overview

TD Bank, N.A.
2035 Limestone Road
Wilmington, DE 19808

Description

TD Bank, N.A. is a \$204 billion national bank headquartered in Wilmington, Delaware. The bank is a wholly owned subsidiary of the Toronto-Dominion Bank of Toronto, Canada, which is listed on the New York Stock Exchange and is among the biggest financial services companies in North America.

TD Bank, N.A. is one of the 10 largest banks in the U.S., with more than 27,000 employees and 8 million customers. The bank operates over 1,200 retail branches in 15 states.

TD Bank offers banking services and products to individuals, business and governments including commercial and consumer services. Through its Wealth Management Group division, it provides trust and investment management services. TD Bank also operates divisions in government banking, mortgage banking, private banking, asset-based lending and merchant services.

Principal Officers

President & CEO

Mike Pederson
2035 Limestone Road
Wilmington, DE 19808
416-982-8222

CFO

Colleen Johnston
2035 Limestone Road
Wilmington, DE 19808
416-982-8222

Regional President, Connecticut, Massachusetts, and Rhode Island

Mark Crandall
2035 Limestone Road
Wilmington, DE 19808
416-982-8222

Employees

Number of Employees	25,490 ³²⁴
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	1315
Branches in Boston	8
Number of ATMs in Boston	11
Number of Free-Standing ATMs in Boston	3

CRA Rating

Rating Agency	Office of the Comptroller of the Currency
Most Recent Rating	2011
Overall Rating for Boston MSA	OUTSTANDING ³²⁵
Lending Test Rating for Boston MSA	OUTSTANDING
Investment Test Rating for Boston MSA	OUTSTANDING
Service Test Rating for Boston MSA	HIGH SATISFACTORY

³²⁴ FDIC Institution Directory.

³²⁵ Based on most recent CRA Performance Evaluation by OCC published 2011.



Discussion

**Overall Rating for Boston MSA:
OUTSTANDING³²⁶**

The OCC evaluated both TD Bank’s nationwide activities, and its specific performance in the Boston MSA.

Nationwide, the bank’s rating were identical to its Boston MSA ratings: the bank received a rating of “OUTSTANDING” overall and for its Lending Test and its Investment Test; and “HIGH SATISFACTORY” for its Service Test. The discussion below focuses on the Boston MSA results.

Lending Test

**Lending Test Rating for Boston MSA:
OUTSTANDING³²⁷**

TD Bank’s lending performance is excellent. There bank’s overall level of lending activity is excellent, combined with good borrower distribution and good geographic distribution for all products. The bank’s level of Community Development Lending was considered excellent.³²⁸

General Responsiveness to Credit Needs

TD Bank’s overall lending activity is excellent. Although lending market shares for home purchase and home refinance are below the bank’s deposit share, TD Bank achieved high rankings and excellent loan volume for mortgage products and small business lending.

In Boston, TD Bank ranks in the top 15 in all loan categories, despite a highly competitive lending environment, with nearly 300 lenders for home purchase and nearly 400 lenders for refinance loans in the Boston market. TD Bank ranked first in home improvement lending with over a 10% market share. TD Bank was also the number-four small business lender in Boston.³²⁹

Responsiveness to Low- and Moderate-Income Credit Needs

In Boston, TD Bank achieved a good distribution of all loan products to borrowers with different income levels. Its distribution of loans across census tracts of various income levels was also good, and the bank’s geographic distribution of home purchase and home improvement loans in low- and moderate-income geographies was excellent.

The bank’s success in these areas takes place against the backdrop of the high cost of housing in the Boston MSA and the low level of owner-occupied housing in low-income geographies in the city.³³⁰

Leadership in Community Development

Loans

TD Bank’s high level of community development lending significantly impacted its overall lending test rating in Boston. The bank’s community development lending focuses on supporting affordable housing developments, with secondary focus on community services and economic development.³³¹

Innovative or Flexible Lending Practices

TD Bank makes significant use of flexible loan products, which make credit more accessible or more affordable to low- and moderate-income borrowers. During the evaluation period, the bank originated 27 FHA loans totaling \$4.7 million and 16 Right Step loans totaling \$3.1 million in the Boston MSA.³³²

Investment Test

**Investment Test Rating for Boston MSA:
OUTSTANDING³³³**

TD Bank’s overall investment performance is excellent. The bank’s performance was consistently excellent throughout its assessment areas based on volume of investments and on meeting the needs of the community. TD Bank

³²⁶ Based on most recent CRA Performance Evaluation by OCC published 2011.

³²⁷ Based on most recent CRA Performance Evaluation by OCC published 2011.

³²⁸ Ibid.

³²⁹ Ibid.

³³⁰ Ibid.

³³¹ Ibid.

³³² Ibid.

³³³ Based on most recent CRA Performance Evaluation by OCC published 2011.



remained an active investor in low-income housing tax credits during the evaluation period.

In Boston, TD Bank’s volume of qualified investments was excellent. During the evaluation period, the bank made 93 investments in the Boston MSA totaling \$20.2 million. Of qualified investments made prior to the current evaluation period, five remained outstanding as of year-end 2011 and had balances totaling \$2.6 million. These prior-period investments add support for the bank’s outstanding rating.³³⁴

Service Test

Service Test Rating for Boston MSA: HIGH SATISFACTORY³³⁵

TD Bank’s service test was rated High Satisfactory. The bank has excellent distribution of branches across geographies of different income levels, and a good level of community development services.

Description of Service-Delivery Systems

TD Bank’s branches are accessible to geographies and individuals of different income levels. The percentage of the bank’s branches located in low- and moderate-income geographies is close to the respective percentages of low- and moderate-income population in the assessment area.³³⁶

Community Development Services

TD Bank provided a good level of community development services in the Boston MSA. The bank’s community development services met a broad range of identified needs in Boston, including housing education and social services for low- and moderate-income families. Employees served on committees or boards for economic development, affordable housing, and community service organizations.³³⁷

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
1 Union Street Boston, MA 02108	✓	✓
24 Winter Street Boston, MA 02108	✓	✓
250 Cambridge Street Boston, MA 02114	✓	✓
185 Franklin Street Boston, MA 02110	✓	✓
535 Boylston Street Boston, MA 02116	✓	✓
1228-1230 Commonwealth Avenue Allston, MA 02134		
391 Market Street Brighton, MA 02135	✓	✓
1833 Centre Street West Roxbury, MA 02132	✓	✓
One Merrimac Street Boston, MA 02114	✓	
100 Legends Way TD Garden Boston, MA 02114	✓	
200 Terminal Road Boston, MA 02128	✓	

FSB: Full Service Branch

³³⁴ Ibid.

³³⁵ Based on most recent CRA Performance Evaluation by OCC published 2011.

³³⁶ Ibid.

³³⁷ Ibid.



Year-Over-Year at a Glance

HMDA And Low-Income Loans

TD Bank originated a high volume of HMDA-reportable mortgage loans in 2010 through 2012. Applications received and loans originated increased significantly year-over-year from 2011 to 2012.

The bank's low-income HMDA lending levels also increased year over year from 2011 to 2012. From 2011 to 2012, the percentage of applications resulting in an origination increased, and the number of originations tripled.³³⁸

	2010	2011	2012
HMDA Applications Received	199	189	305
HMDA Loans Originated	115	110	176
Low-Income Applications Received	11	11	15
Low-Income Loans Originated	3	3	9

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	1.2%	1.3%	0.7%
Moderate	1.3%	1.0%	1.0%
Middle	0.5%	0.8%	0.7%
Upper	0.9%	1.0%	0.9%
Total	1.0%	1.0%	0.8%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	2.9%	3.4%	1.0%
Moderate	3.1%	2.0%	4.1%
Middle	0.8%	4.0%	4.8%
Upper	1.3%	2.3%	1.9%
Total	2.0%	2.9%	2.6%

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for TD Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

³³⁸ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency, December 31, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

TD Bank Annual Reports, 2011 and 2012.

TD Bank 2012 United States Corporate Responsibility Report.

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

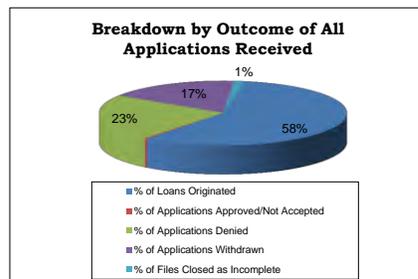
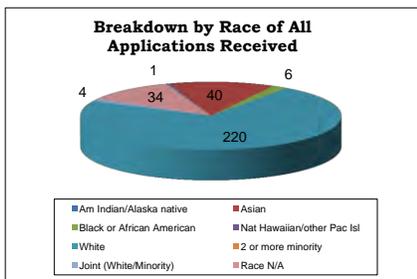
TD Bank website:
<http://www.td.com/>

TD Bank HMDA Mortgage Lending

2012

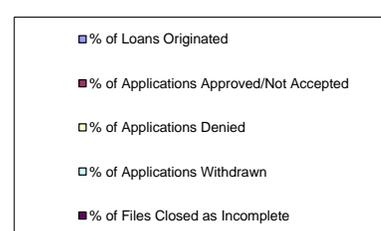
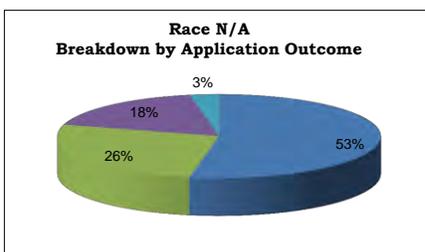
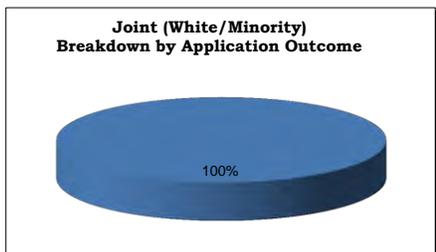
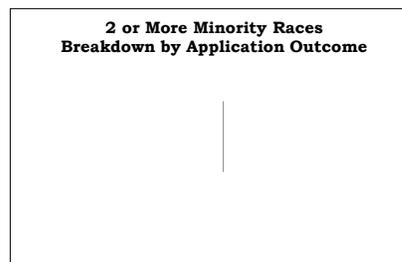
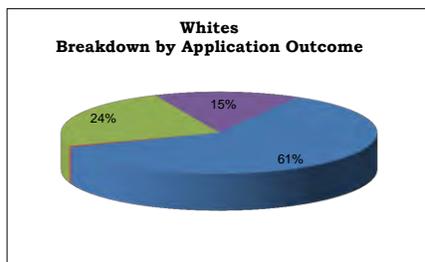
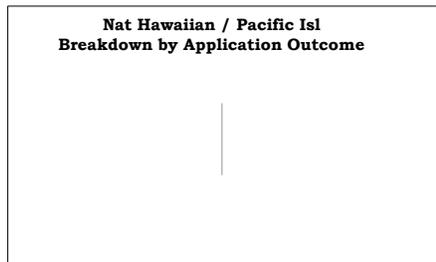
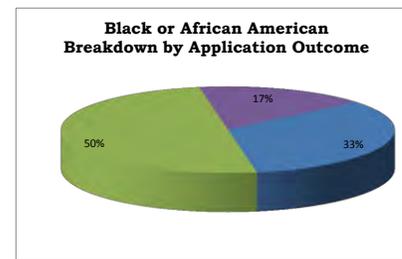
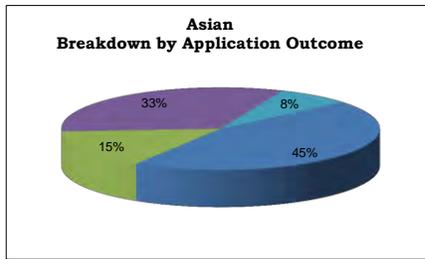
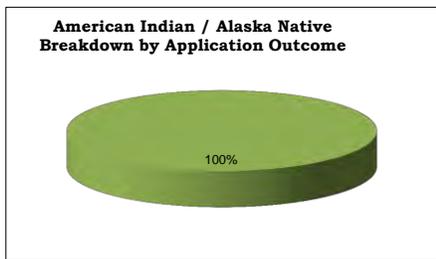
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	1	0%	0	0%	0	0%	1	100%	0	0%	0	0%
Asian	40	13%	18	45%	0	0%	6	15%	13	33%	3	8%
Black or African American	6	2%	2	33%	0	0%	3	50%	1	17%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	220	72%	134	61%	1	0%	52	24%	33	15%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	1%	4	100%	0	0%	0	0%	0	0%	0	0%
Race N/A	34	11%	18	53%	0	0%	9	26%	6	18%	1	3%
Total	305	100%	176	58%	1	0%	71	23%	53	17%	4	1%

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



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

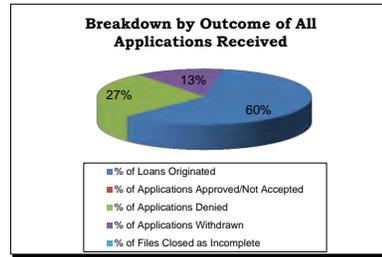
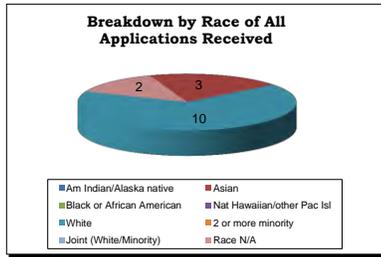
The following charts represent the percentage breakdown by outcome of applications received by race. For example: of all applications received, those originated are highlighted in blue, those not accepted are in red, etc.



TD Bank Low-Income Mortgage Lending 2012

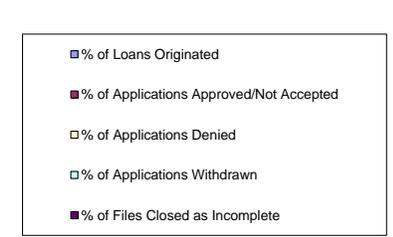
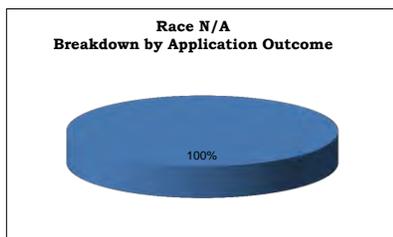
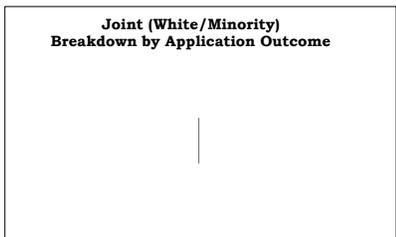
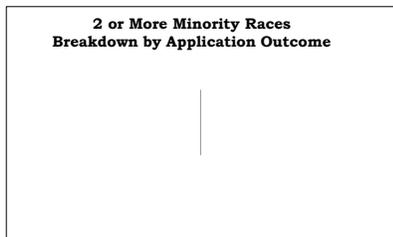
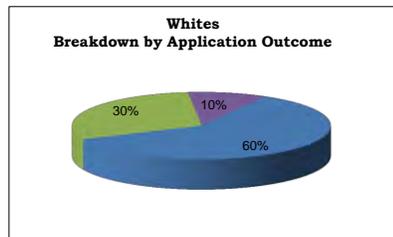
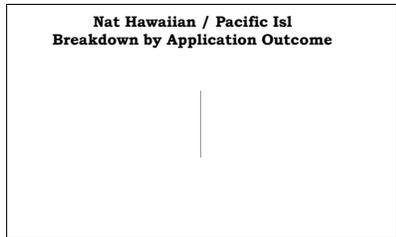
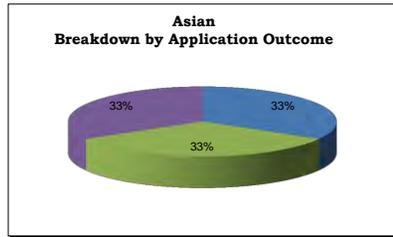
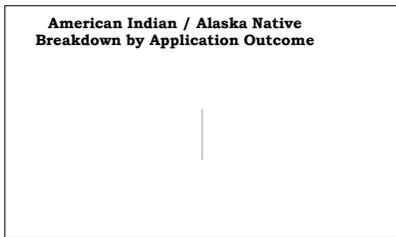
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	3	20%	1	33%	0	0%	1	33%	1	33%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	10	67%	6	60%	0	0%	3	30%	1	10%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	13%	2	100%	0	0%	0	0%	0	0%	0	0%
Total	15	100%	9	60%	0	0%	4	27%	2	13%	0	0%

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



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

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



Compared against the MSA Aggregate Total

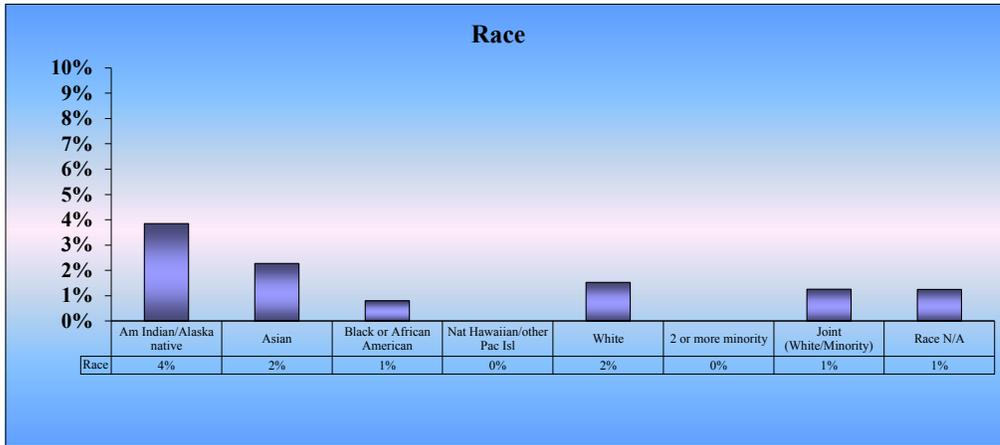
2012

TD Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	1	4%	0	0%	0	0%	1	20%	0	0%	0	0%
Asian	40	2%	18	1%	0	0%	6	3%	13	8%	3	7%
Black or African American	6	1%	2	0%	0	0%	3	2%	1	2%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	220	2%	134	1%	1	0%	52	4%	33	3%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	4	1%	4	2%	0	0%	0	0%	0	0%	0	0%
Race N/A	34	1%	18	1%	0	0%	9	4%	6	2%	1	1%
Total	305	2%	176	1%	1	0%	71	4%	53	3%	4	1%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.

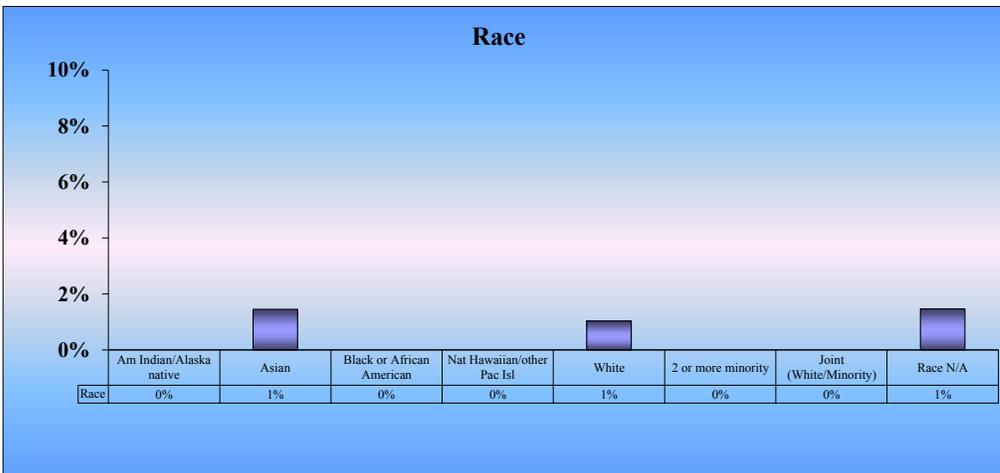


TD Bank Low-Income Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	3	1%	1	1%	0	0%	1	3%	1	7%	0	0%
Black or African American	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	10	1%	6	1%	0	0%	3	1%	1	1%	0	0%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	2	1%	2	3%	0	0%	0	0%	0	0%	0	0%
Total	15	1%	9	1%	0	0%	4	1%	2	2%	0	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.







Webster Bank



Webster Bank Overview

Webster Bank, N.A.
 Webster Plaza
 Waterbury, CT 06702

Description

Webster Bank, N.A., is a nationally chartered, \$20.1 billion bank headquartered in Waterbury, Connecticut. The bank is the principal subsidiary of Webster Financial Corporation, Inc., a bank holding company organized under the laws of Delaware.

Webster operates 169 branches and 478 ATMs in Connecticut, Rhode Island, Massachusetts, and New York. The vast majority (84%) of the bank’s deposits are from the bank’s Connecticut offices. About two percent of Webster Bank’s total deposits are from its Massachusetts offices.

Webster Bank’s business strategy is focused on retail lending, with half the bank’s loan portfolio secured by 1-4 family residential loans. The bank emphasizes comprehensive full-service relationships and quality of service. The bank’s customer base is primarily comprised of individual depositors and borrowers.

Principal Officers

Chairman and CEO

James C. Smith
 Webster Plaza
 Waterbury, CT 06702
 800-325-2424

CFO

Glenn I. MacInnes
 Webster Plaza
 Waterbury, CT 06702
 800-325-2424

Regional President, Massachusetts and Rhode Island

Bob Twomey
 Webster Plaza
 Waterbury, CT 06702
 800-325-2424

Employees

Number of Employees	2,823 ³³⁹
Number of Employees in Massachusetts	NA
Percentage of Women Employees	NA
Percentage of Minority Employees	NA

Branches

Number of Branches - Total	169
Branches in Boston	1
Number of ATMs - Total	478
Free-Standing ATMs	309

CRA Rating

Rating Agency	OCC
Most Recent Rating	2011
Overall Rating for Massachusetts	OUTSTANDING ³⁴⁰
Lending Test	HIGH
Rating for Massachusetts	SATISFACTORY
Investment Test	OUTSTANDING
Rating for Massachusetts	
Service Test Rating for Massachusetts	OUTSTANDING

³³⁹ FDIC Institution Directory.

³⁴⁰ Based on most recent CRA Performance Evaluation by OCC published 2011.



Discussion

**Overall rating for Massachusetts:
OUTSTANDING³⁴¹**

The OCC evaluated both Webster Bank’s nationwide activities, and its specific performance in Massachusetts.

The bank’s Massachusetts performance ratings were higher than its overall performance ratings. Overall, Webster Bank received a rating of “SATISFACTORY.” Its Lending Test, Investment Test, and Service Test were all rated “HIGH SATISFACTORY.” The discussion below focuses on the bank’s Massachusetts CRA ratings.

Lending Test

**Lending Test Rating for Massachusetts: HIGH
SATISFACTORY³⁴²**

Webster Bank’s performance under the Lending Test in Massachusetts is rated “High Satisfactory.” The bank’s Boston-area lending performance is considered good.

General Responsiveness to Credit Needs

Webster Bank’s lending levels reflect adequate responsiveness to the credit needs of its Massachusetts assessment areas. In Boston, Webster Bank’s overall lending activity is considered adequate for both home mortgages and small business lending.³⁴³

Webster Bank’s Massachusetts market share and rank (0.7% of deposits, or 30th in Massachusetts) is much higher than its share and rank of home mortgage lending (0.2% percent, or 93rd). However, this is considered adequate given the intense competition and high cost of housing in Massachusetts.

Webster Bank is committed to assisting qualified borrowers who have a verified financial hardship. The bank’s “Loss Mitigation Program” helps borrowers in the early stages of

delinquency to identify sustainable alternatives to foreclosure. Webster Bank’s mortgage assistance programs were designed with input from community and housing organizations, and focus on creating affordable, sustainable payment plans.³⁴⁴

Responsiveness to Low- and Moderate-Income Credit Needs

Webster Bank achieved excellent distribution of home mortgage loans and small business loans in low- and moderate-income geographies.³⁴⁵ In Boston, the percentage of home purchase loans that Webster Bank made in low- and moderate-income geographies significantly exceeds the percentage of owner occupied units.

The bank also achieved a good distribution of home mortgage loans among low- and moderate-income borrowers. The percentage of home purchase loans Webster Bank made to low-income individuals in Boston is significantly lower than the percentage of low-income families, but is considered adequate based on Boston’s mortgage lending environment. The percentage of home purchase loans made to moderate-income individuals exceeds the percentage of such families.³⁴⁶

Webster Bank also has an excellent record of lending to small businesses in Boston’s low- and moderate-income geographies.

Leadership in Community Development Loans

Webster did not originate any community development loans in Massachusetts during this CRA evaluation period (2007-2010).

Innovative or Flexible Lending Practices

Webster offers several flexible HMDA loan programs to low- and moderate-income borrowers.

The *30 HOPE* loan program and the *My Community Mortgage* program are flexible based upon bank-specific terms and conditions. In the Boston assessment area, Webster originated 12

³⁴¹ Based on most recent CRA Performance Evaluation by OCC published 2011.

³⁴² Ibid.

³⁴³ Ibid.

³⁴⁴ Ibid.

³⁴⁵ Ibid.

³⁴⁶ Ibid.



loans, totaling \$2.6 million, under these programs.

Webster participates in other HMDA loan programs that are flexible based upon national or state-designed underwriting criteria. In Boston, the bank made 21 loans totaling \$5.1 million under such programs, demonstrating its dedication to meeting the needs of low- and moderate-income borrowers.³⁴⁷

Investment Test

Investment Test Rating for Massachusetts:
OUTSTANDING³⁴⁸

The bank's performance under the investment test in the State of Massachusetts is rated Outstanding. Webster Bank's level of qualified investments reflects excellent responsiveness to the state's credit and community development needs.³⁴⁹

In Boston, Webster Bank has an excellent level of qualified investments. Total investments consist primarily of one mortgage-backed security for \$2,430,855 consisting of loans made to low- and moderate-income borrowers residing in Boston. Investments of this nature help meet community needs by providing liquidity to lenders so that more loans to lower-income borrowers can be originated.³⁵⁰

The remaining investments consist of \$42,600 in grants and donations. These grants and donations support the needs of low- and moderate-income residents of Boston, including affordable housing, community services, economic development, and neighborhood revitalization/stabilization.

Service Test

Service Test Rating for Massachusetts:
OUTSTANDING³⁵¹

Webster Bank's performance under the Service Test in the State of Massachusetts is rated "Outstanding." The bank's performance in Boston is also considered excellent.

Description of Service-Delivery Systems

Webster Bank's service delivery systems are readily accessible to geographies and individuals of different income levels. The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems.

Webster Bank's branches offer adequate hours and services throughout the assessment area. However, the average opening hours of the bank's branches in low- to moderate-income geographies are lower than average middle/upper income branch location hours.³⁵²

Bank employees speak 32 different languages, and the bank has implemented a company-wide plan to have bilingual (Spanish and other languages) employees at every branch location to serve the local demographic.

Community Development Services

Webster Bank's performance in providing community development services in Boston is good.³⁵³

Webster Bank employees conducted five financial literacy seminars during the evaluation period, which reached 39 attendees in the Boston area. In addition, the bank provided funding and staff to support foreclosure prevention programs that served low- and moderate-income geographies. These efforts helped stabilize those geographies.

Webster's Opportunity Checking Account product was introduced in 2008 to provide access to regular banking services to un-banked consumers who are ineligible to open regular checking accounts. The percentage of Opportunity Checking customers in Boston-area lower-income geographies very significantly exceeds the percentage of the population residing in these geographies, demonstrating the positive impact of this product to customers residing in

³⁴⁷ Ibid.

³⁴⁸ Based on most recent CRA Performance Evaluation by OCC published 2011.

³⁴⁹ Ibid.

³⁵⁰ Ibid.

³⁵¹ Ibid.

³⁵² Ibid.

³⁵³ Ibid.



low- and moderate-income geographies.³⁵⁴

To help meet the needs of lower-income families, Webster began waiving ATM access fees for state assistance Electronic Benefits Transfer (EBT) cards at Webster-owned ATMs in 2010. Service fees are waived regardless of whether the cardholder is a Webster Bank customer. In 2010, Webster waived \$63,127 in fees for 21,399 EBT cardholders in the Massachusetts.³⁵⁵

Branch Information

Branch locations in the Boston MSA:

Location	ATM	FSB
100 Franklin Street Boston, MA 02110 FSB: Full Service Branch	✓	✓

Year-Over-Year at a Glance

HMDA And Low-Income Loans

Webster Bank’s HMDA lending increased fourfold from 2010 to 2012, from 15 loans to 60 loans. The bank’s level of low-income HMDA lending remained low.³⁵⁶

	2010	2011	2012
HMDA Applications Received	26	52	88
HMDA Loans Originated	15	37	60
Low-Income Applications Received	3	2	6
Low-Income Loans Originated	1	1	3

Small Business Loans

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

Bank Compared to MSA Aggregate			
Distribution of the Number of Small Business Loans			
	2010	2011	2012
Low	0.1%	0.1%	0.1%
Moderate	0.0%	0.0%	0.0%
Middle	0.0%	0.0%	0.0%
Upper	0.1%	0.2%	0.1%
Total	0.0%	0.1%	0.0%

Bank Compared to MSA Aggregate			
Distribution of the Dollar Amount of Small Business Loans			
	2010	2011	2012
Low	1.1%	0.8%	1.4%
Moderate	0.0%	0.0%	0.0%
Middle	0.0%	0.0%	0.0%
Upper	0.5%	0.9%	0.8%
Total	0.4%	0.5%	0.6%

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Small Business Loans](#) for details on small business loans. The small business loan activity for Webster Bank in the year 2012 is also compared to the 2012 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 2012 and the dollar amount of the loans provided. A discussion of the data follows each chart.

Loan Information by Census Tract

Please refer to the addendum [City of Boston 2012 Linked Deposit Banking Report to the Mayor Addendum: Loan Information by Census Tract](#) for details on loan information by census tract.

³⁵⁴ Ibid.

³⁵⁵ Ibid.

³⁵⁶ FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.



Source Documents

Community Reinvestment Act Performance Evaluation, Office of the Comptroller of the Currency, February 7, 2011.

FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

City of Boston 2011 Linked Deposit Banking Report to the Mayor, BankIQ; March 2013.

Webster Bank Annual Report 2011.

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

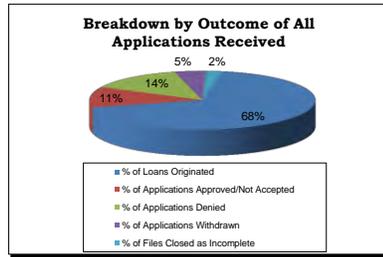
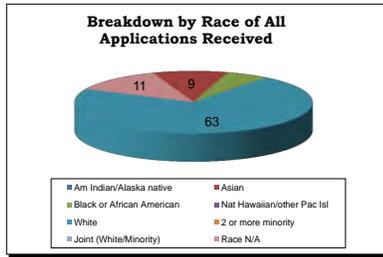
Webster Bank website:
<http://www.websterbank.com/>

Webster Bank HMDA Mortgage Lending

2012

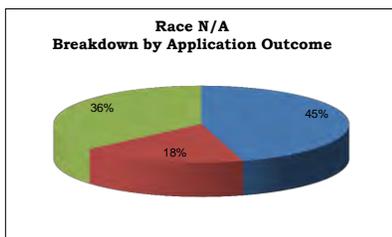
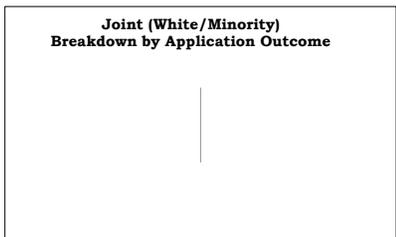
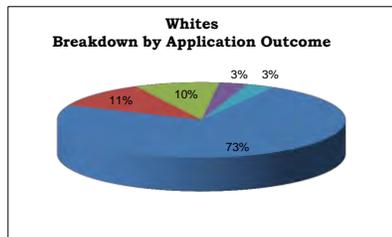
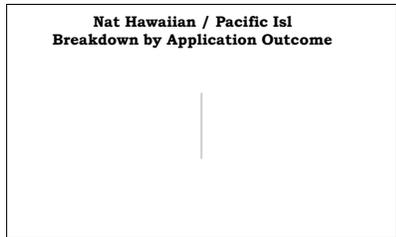
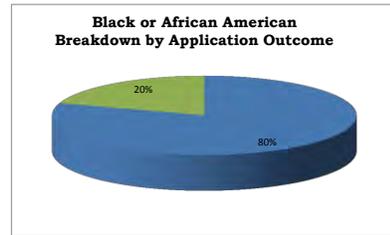
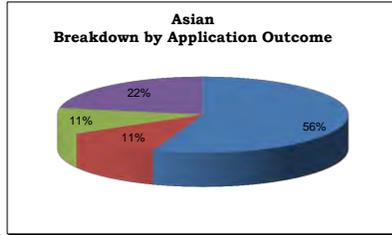
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	9	10%	5	56%	1	11%	1	11%	2	22%	0	0%
Black or African American	5	6%	4	80%	0	0%	1	20%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	63	72%	46	73%	7	11%	6	10%	2	3%	2	3%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	11	13%	5	45%	2	18%	4	36%	0	0%	0	0%
Total	88	100%	60	68%	10	11%	12	14%	4	5%	2	2%

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



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

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



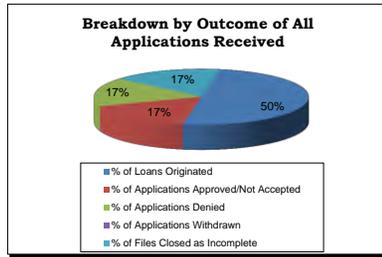
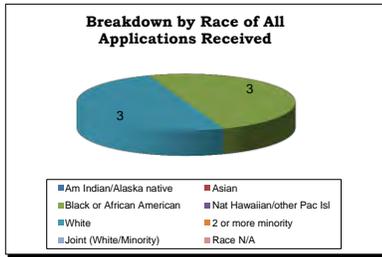
- % of Loans Originated
- % of Applications Approved/Not Accepted
- % of Applications Denied
- % of Applications Withdrawn
- % of Files Closed as Incomplete

Webster Low-Income Mortgage Lending

2012

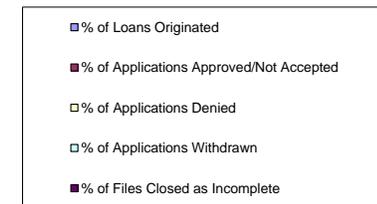
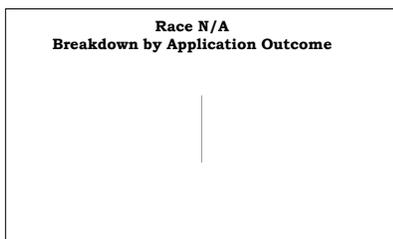
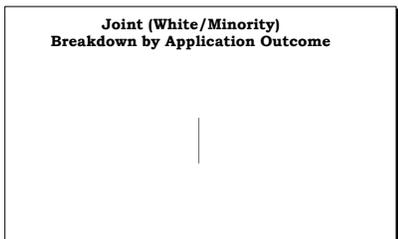
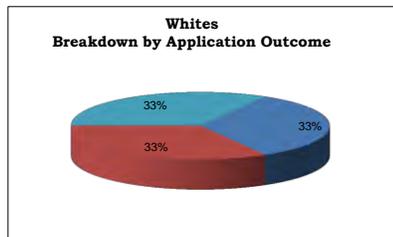
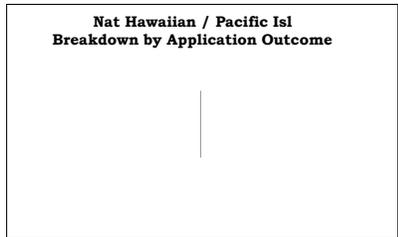
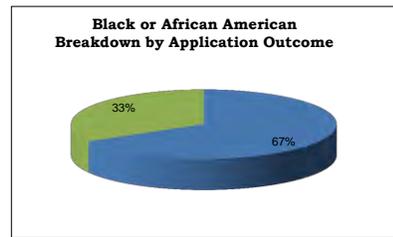
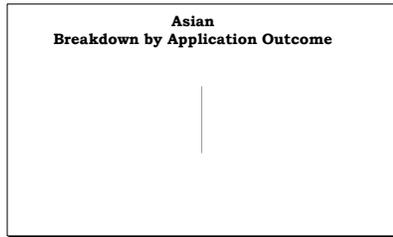
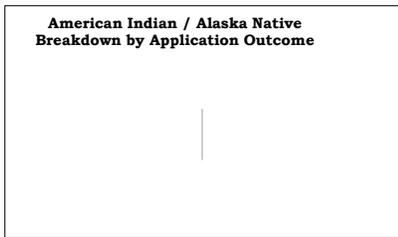
Race	Applications Received	% of Total Applications Received	Loans Originated	% of Loans Originated	Applications Approved/Not Accepted	% of Applications Approved/Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	% of Applications Withdrawn	Files Closed as Incomplete	% of Files Closed as Incomplete
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Black or African American	3	50%	2	67%	0	0%	1	33%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	3	50%	1	33%	1	33%	0	0%	0	0%	1	33%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Total	6	100%	3	50%	1	17%	1	17%	0	0%	1	17%

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



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

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



Compared against the MSA Aggregate Total

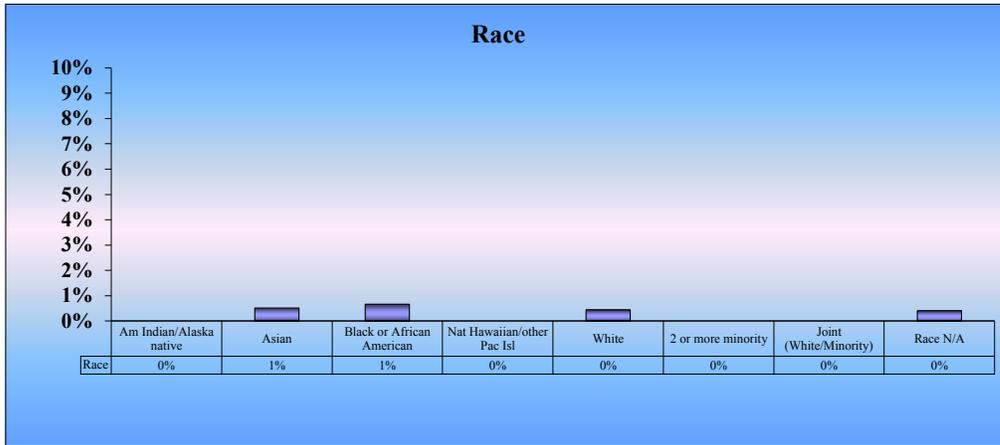
2012

Webster Bank HMDA Mortgage Information

Race	Applications Received by bank	% of Applications Received in MSA	Loans Originated by bank	% of Loans Originated in MSA	Applications Approved/Not Accepted by bank	% of Applications Approved/Not Accepted in MSA	Applications Denied by bank	% of Applications Denied in MSA	Applications Withdrawn by bank	% of Applications Withdrawn in MSA	Files Closed as Incomplete by bank	% of Files Closed as Incomplete in MSA
Am Indian/Alaska native	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Asian	9	1%	5	0%	1	1%	1	0%	2	1%	0	0%
Black or African American	5	1%	4	1%	0	0%	1	1%	0	0%	0	0%
Nat Hawaiian/other Pac Isl	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
White	63	0%	46	0%	7	2%	6	0%	2	0%	2	1%
2 or more minority	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Race N/A	11	0%	5	0%	2	2%	4	2%	0	0%	0	0%
Total	88	0%	60	0%	10	1%	12	1%	4	0%	2	0%

The chart below is the breakdown by race of the applications received at the bank compared against the MSA total.

For example: the percentage of Asian applications is the percentage of Asian applications this bank processed compared to the total number of Asian applications processed in the MSA.

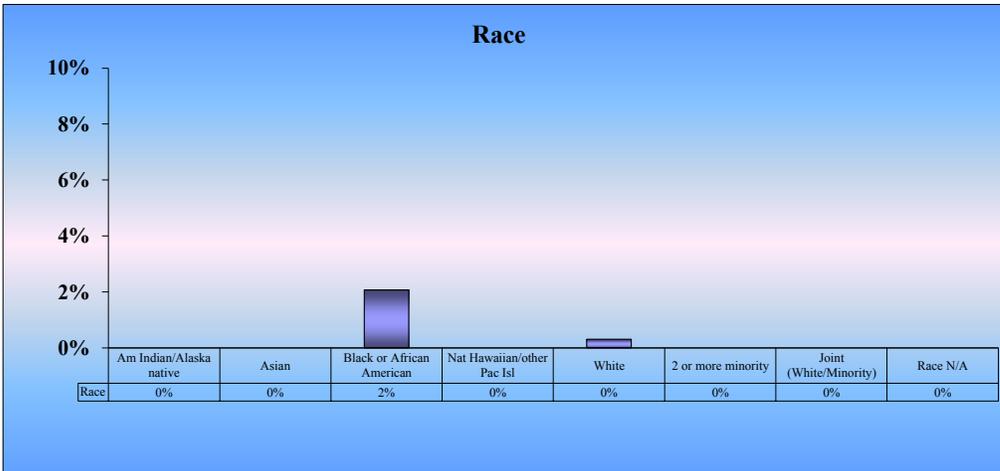


Webster Bank Low-Income Mortgage Information

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

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.







Appendix A



Appendix A

List of Source Documents

Bank of America

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

Bank of America Annual Report, 2011 and 2012.

Bank of America 2012 Corporate Social Responsibility Report.

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

Cathay Bank website:

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Century Bank & Trust

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FFIEC online HMDA reports, Board of the Governors of the Federal Reserve System; 2012.

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Century Bank website:

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

Commonwealth Cooperative Bank

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

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www.masshousing.com

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Meridian Interstate Bancorp, Inc., 2012 Annual Report.

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Eastern Bank Charitable Foundation Annual Report, 2012.

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Federal Deposit Insurance Corporation & The Commonwealth of Massachusetts Division of Banks to OneUnited Bank – Order To Cease And Desist; FDIC-08-294b; Issued October 27, 2008.

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FDIC Information Directory:

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Citizens Financial Group Annual Report 2011 and 2012.

Citizens Bank website:

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

Sovereign Bank

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Sovereign Bank website:

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TD Bank 2012 United States Corporate Responsibility Report.

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TD Bank website:

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Webster Bank

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Webster Bank Annual Report 2011.

FDIC Institution Directory

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

Webster Bank website:

<http://www.websterbank.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:

2. Ascertainment of community needs.
3. Marketing and types of credit offered and extended.
4. Geographic distribution and record of opening and closing offices.
5. Discrimination and other illegal practices.
6. 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 affected the accessibility of its delivery systems, particularly in low and moderate-income geographies and to low and moderate-income individuals. Its services (including, where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low and moderate-income geographies and low and moderate-income individuals. It provides a relatively high level of community development services.

Low satisfactory

Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its assessment area(s). Its record of opening and closing branches has generally not adversely effected the accessibility of its delivery systems, particularly in low and moderate-income geographies and to low and moderate-income individuals. Its services (including where appropriate, business hours) do not vary in a way that inconveniences its assessment area(s), particularly low and moderate-income geographies and low and moderate-income individuals. It provides an adequate level of community development services.

Needs to improve

Its service delivery services are unreasonably inaccessible to portions of its assessment area(s), particularly to low or moderate-income geographies or to low or moderate-income individuals. Its record of opening and closing branches has adversely affected the accessibility of its delivery systems, particularly low or moderate-income geographies, or to low or moderate-income individuals. Its services (including, where appropriate, business hours)



vary in a way that inconveniences its assessment area(s), particularly low or moderate-income geographies, or low or moderate-income individuals. It provides a limited level of community development services.

Substantial noncompliance

Its services delivery systems are unreasonably inaccessible to significant portions of its assessment area(s) particularly to low or moderate-income geographies or to low or moderate-income individuals. Its record of opening and closing branches has a significant, adverse effect on the accessibility of its delivery systems, particularly in low or moderate-income geographies, or to low or moderate-income individuals. Its services (including, where appropriate, business hours) vary in a way that significantly inconveniences its assessment area(s), particularly low or moderate-income geographies or low or moderate-income individuals. It provides few, if any, community development services.



Appendix D



Appendix D

Definitions

Income Levels

Low Income

Median income less than 50% of the Primary Metropolitan Statistical Area's Median Family Income (MFHI).

Moderate Income

Median income level 50% to less than 80% of the MFHI.

Middle Income

Median income 80% to less than 120% of the MFHI.

Upper Income

Median income equal to or greater than 120% of MFHI.

Regulations and Regulatory Agencies

FDIC

The Federal Deposit Insurance Corporation (FDIC) is the independent deposit insurance agency created by Congress to maintain stability and public confidence in the nation's banking system. In its unique role as deposit insurer of banks and savings associations, and in cooperation with the other federal and state regulatory agencies, the FDIC promotes the safety and soundness of insured depository institutions and the U.S. financial system, by identifying, monitoring and addressing risks to the deposit insurance funds. In addition, the FDIC gathers data about individual financial institutions and the banking industry. FDIC publications contain information the agency has gathered about the banking industry, including statistical reports and studies that examine current and historical issues in banking and economic trends. There are various data applications that profile the banking industry, analyze national and regional trends, share original research on issues related to banking and deposit insurance, and report on such important issues as emerging risk and underwriting practices. They also compile financial data concerning FDIC-insured institutions. There are historical studies of deposit insurance from its beginnings in the 1930s.

FFIEC

The Federal Financial Institutions Examination Council (FFIEC) was established March 10, 1979. The Council is a formal interagency body, empowered to prescribe uniform principles,

standards, and report forms, for federal examination of financial institutions by the Board of Governors of the Federal Reserve System (FRB). The Federal Deposit Insurance Corporation (FDIC), the National Credit Union Administration (NCUA), the Office of the Comptroller of the Currency (OCC) and the Office of Thrift Supervision (OTS). FFIEC makes recommendations to promote uniformity in the supervision of financial institutions. The Council was given additional statutory responsibilities by section 340 of the Housing and Community Development Act of 1980 to facilitate public access to data that depository institutions must disclose under the Home Mortgage Disclosure Act of 1975 (HMDA) and the aggregation of annual HMDA data, by census tract, for each metropolitan statistical area (MSA). The Council has established, in accordance with the requirement of the statute, and advisory State Liaison Committee composed of five representatives of the state supervisory agencies.

HMDA

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Bank's 'Regulation C'. This regulation provides the public loan data that can be used to assist in the following: to determine whether financial institutions are serving the housing needs of their communities; to assist public officials in distributing public-sector investments, so as to attract private investments to areas where it is needed; and in identifying possible discriminatory lending patterns. The regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Using the loan data submitted by these financial institutions, the Federal Financial Institutions Examination Council (FFIEC) creates aggregate and disclosure reports for each metropolitan statistical area (MSA) that are available to the public at central data depositories located in each MSA.

OCC

The Office of the Comptroller of the Currency (OCC) charters, regulates, and supervises all national banks. It also supervises the federal branches and agencies of foreign banks. The OCC was established in 1863 as a bureau of the



U.S. Department of the Treasury. The Office's principal function is the supervision of the national banking system. A staff of over 1,800 bank examiners performs the statutorily required, regular examinations of more than 2,500 banks subject to the Comptroller's supervision. The CRA's implementing regulation requires the OCC to access a national bank's record of helping to meet the credit needs of its entire community, including low and moderate-income neighborhoods, consistent with safe and sound operations. It also mandates that the agency consider that record, in its evaluation of a bank's application for new branches, relocation of an existing branch, bank mergers and consolidations, and other corporate activities. In general, the OCC conducts a CRA examination of a bank every 24 months.

OTS

The Office of Thrift Supervision (OTS) is the primary regulator of all federal and many state-chartered thrift institutions, which include savings banks and savings and loan associations. The OTS was established as an office of the Department of the Treasury on August 9, 1989. The OTS has five regional offices, located in: Jersey City, Atlanta, Chicago, Dallas, and San Francisco. The Community Reinvestment Act requires the OTS to assess a savings association's record of helping meet the credit needs of its entire community, including low and moderate-income neighborhoods, consistent with safe and sound operations. It also mandates that the agency consider that record, in its evaluation of savings association's application for new branches, relocation of an existing branch, mergers and consolidations, and other corporate activities. In general, the OTS conducts a CRA examination of savings associations every 24 months. A written evaluation of the savings association's CRA activities, including a CRA rating, is prepared at the end of each CRA examination. Pursuant to the CRA, savings associations are assigned one of four statutory ratings: Outstanding, Satisfactory, Needs to Improve, Substantial Noncompliance





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BankIQ prepared this document for the City of Boston.

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

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